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10/10/2003 12:33:47 PM

Record Type: Record

To: Mabel E. Echols OMB_Peer_Review/OMB/EOP
cc: Adrienne Froelich <afroelich@aslo.org>, cssp@acs.org
Subject: OMB Peer Review Proposal

Thank you for the opportunity to comment on the [Federal Register: September 15, 2003 (Volume 68, Number 178)] [Notices] [Page 54023-54029] [From the Federal Register Online via GPO Access [wais.access.gpo.gov] [DOCID:fr15se03-131].

Although my comments are my own, I speak from the experience of six years as Editor in Chief, supervising the peer review of the world's pre-eminent aquatic sciences journal (Limnology and Oceanography). I am also the current President of the American Society of Limnology and Oceanography and a member of the Board of the Council of Scientific Society Presidents.

Peer review has two functions. One is evaluative. That function is well discussed in your background information and the specific guidance in the wording of the proposed legislation. The other function is improvement of the document being reviewed. The best peer reviews state explicitly where and how the document could be improved. Emphasizing the latter function helps to serve both functions because it points out those features that CAN be improved: Constructive criticism is the most useful to all parties. Emphasizing that function would remove some of the contentious tone of your background material and the legislation itself.

One technical detail is the guidance that "Where reviewers are expected to identify scientific uncertainties, they should generally be asked to suggest ways to reduce or eliminate those uncertainties." The scientific method is a means to localize and quantify uncertainties and not in general to eliminate them. Many uncertainties are inherent in natural variability and cannot be eliminated. Lawyers "prove" things (to the satisfaction of a dozen peers), but scientists acknowledge that proof or disproof is impossible in science. A better wording would be "Where reviewers are expected to identify scientific uncertainties, they should generally be asked to comment on the quantification of those uncertainties."

In terms of finding competent reviewers, my society (the American Society of Limnology and Oceanography) maintains a directory of qualified scientists who are interested in policy, and we would be happy to work with agencies seeking qualified reviewers on particular aquatic sciences subjects. Many of our sister societies do the same.

Have you visited <<http://www.aslo.org/>> lately?

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