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To: Mabel E. Echols OMB\_Peer\_Review/OMB/EOP@EOP

cc:

Subject: Guidelines for peer review of regulatory science



OMB\_peer\_review\_of\_reg\_sci.

December 8, 2003

To Whom It May Concern:

I have serious objections concerning the Proposed guidelines for Peer Review of Regulatory Science from OMB.

Although the first part of the notice has many appropriate comments regarding the importance of peer review for such studies, and the appropriateness of identifying peer reviewers without conflict of interest, I believe that the proposed guidelines will seriously undermine a rigorous peer review by qualified experts. There are two parts of the proposed guidelines to which I strongly object:

- 1) inclusion of reviewers with "contrary bias"
- 2) consideration by the peer reviewers of comments from the public.

As Executive Order 12866 states, agencies should base decisions on "the best reasonably obtainable scientific, technical, economic or other information..." If this happens, studies will be evaluated for soundness of experimental design and the degree of certainty associated with conclusions. There should be no possible bias from the peer reviewers who would be expected to approach the review of factual matter with an open mind. Such a review is not a matter for opinion--either from the public or due to "bias" from reviewers. By interjecting public opinion or reviewers with "contrary bias" there will be an unfortunate and inappropriate mixture of opinions originating from non-factual sources such as religious or political beliefs. While such beliefs are appropriate and protected in our free country, they are inappropriate in the context of evaluating factual material. They interject pre-conceived ideas that are not based on facts or experimental design and negate the usefulness of any scientific review process.

I strongly oppose these new regulations. These comments are also attached as an independent file.

Sincerely yours,

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