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To: Mabel E. Echols OMB_Peer_Review/OMB/EOP@EOP
cc:
Subject: Peer Review Bulletin

Joshua B. Bolten,
Director, Office of Management and Budget

RE OMB Bulletin on Peer Review

Dear Mr. Bolten,

Following are my comments on OMB's draft Bulletin on PEER Review. I believe that the Bulletin is much too broad in its application, requiring many hundreds of reviews annually, and can only serve the purposes of delay in needed regulatory reforms and cost escalation that will erode agencies' abilities to fulfill their missions. The Bulletin further installs exemptions in areas that critically need much more rigorous peer review than is presently accorded adjudications and permits in areas vital to public health.

As a research scientist working in a non-regulatory agency for 35 years, I have much experience in dealing with peer review of my own work, serving as a reviewer for major science publications, and efforts on my own time to promote regulatory changes based on my work, I am particularly sensitive to and interested in issues of the role of science and science-review in regulatory agencies. I am further familiar with, and have published articles on, difficulties of disseminating scientific information obtained by government scientists.

My specific comments are:

The Bulletin makes no attempt to examine the many decades of experience in peer review of the many agencies that practice it in some form, and appears rather to be manipulating a process that by and large works well.

It is not clear where the OMB expects to find truly independent and competent reviewers for the many hundreds of documents that come under OMB's aegis--as laid out by the Bulletin, review will be required of virtually every USFWS and NMFS Biological Opinion, much research funded by the NSF, all National Research Council reports, most Nuclear Regulatory Commission reports, most USGS water reports and many geological reports, and many others.

The approach of inserting "public" review into the peer review process appears basically to invite massive input by business/industry sources to beat down peer reviewers with proprietary information that can't be scientifically assessed. Peer review is technical review of the scientific integrity of reports, not a shooting match with vested interests.

The conflict of interest proposals do not constitute transparency,

but rather provides avenues to pressure agencies to do the will of industry. Academic scientists whose work is supported by federal funding are excluded as reviewers, whereas industry scientists working for regulated parties have a green light to participate.

Blanket exemption for national defense issues is much too broad, and unnecessarily exempts matters that are of critical concern to the public, such as waste cleanup at DoD and DoE sites. Such matters can be treated on a case-by-case basis to assess security issues.

The OMB appears to be a very poor choice as a place to centralize regulatory scientific peer review. It has neither the staff nor the reputation to be an honest broker in the important task of securing real peer review of regulatory documents and judgements.

It is my recommendation that the draft Bulletin be scrapped, and a more in-depth look be taken at where peer review is working and where it isn't before attempting to change the structure of the process.

Sincerely,

Dr. Howard Wilshire
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