



Dave Batker <dbatker@seanet.com>

05/14/2004 02:27:57 PM

Please respond to dbatker@seanet.com

Record Type: Record

To: OMB_peer_review@omb.eop.gov

cc:

Subject: APEX Comments



APEX Comments on
Revised OMB B...



1305 Fourth Avenue, Suite 606
Seattle, Washington 98101
Tel (206) 957-0408 www.a-p-e.com

1305 Fourth Ave., Seattle, WA 98010
Tel: 253-539-4801

APEX Comments on Office of Management and Budget Draft Information Quality Bulletin Peer Review

The Asia Pacific Environmental Exchange (APEX) is a 501C3 non-profit environmental group based in the US with an American staff. We work on Northwest US, National and international environmental issues.

Improving the Information Quality Bulletin for Peer Review process is critical and we are proud of the OMB for engaging in this process. However, there are several areas where the draft is still deficient and must be improved. These changes will serve the public good, benefit OMB and all participating Federal institutions. It is part of further strengthening our democracy.

In Section III(4) the requirement for public review of draft scientific assessments with agency peer review should be reconsidered. It is important that scientific reviews be conducted in as objective an atmosphere as possible. Public review of scientific assessments would likely provide greater access to private special interests, who can afford to intervene in the process at this level providing an opportunity to unduly influence such studies. It would also substantially increase the cost and period of completion of these reviews, because public reviews will certainly take longer and be more difficult than peer reviews. It could also introduce the possibility of court action based on public review processes errors to delay the completion of studies that might have great potential public benefit. Policy proposals based on these reviews must be subject to a public review and discussion process, but not the actual scientific studies. Consider the difficulties if scientists in any setting academic or private were subjected to these same requirements.

In Section V the requirement that agencies post peer review agendas on their websites and develop peer review plans requires greater resources within agencies which seem not to be available. As a public interest group we would like to see a focus on policy

information on the websites and not have resources used on materials we do not find crucial to public discussion.

Section VI. In many areas a statement of adherence, for example for our non-profit to the non-discrimination legal requirements is sufficient. This should also be the case for Agencies with regard to adherence to the revised Bulletin. There is a great deal of important scientific work being conducted by agencies and there is a cost to slowing that work with greater work and reporting burdens. We suggest a simple statement of adherence is sufficient.

In Section III(1)(i) there is a discussion of scientific assessments that could be highly influential and have an impact on the private sector of over \$500 million in a single year. The same stipulation about impacts on the public sector and public goods should be added or the entire section about impact on the private sector should be deleted.

As part of the public goods impacts, non-market losses of ecological services should be expressly included. For example, in the Northwest we are spending billions of dollars on salmon recovery, storm water movement, and flood protection because the non-market economic benefits of ecosystems were not measured and were lost. Now we have to pay indefinitely for benefits that were free and provided in perpetuity with healthy ecosystems. In addition, APEX is working with several local land conservancies, 35 local municipalities, Pierce and King Counties and Mound Rainier National Park to examine these highly valuable ecological services and see how greater economic efficiency and public benefits, as well as protection of private property (flooding etc.) can be accomplished by recognizing and measuring these public benefits. In particular, land acquisition for retaining critical habitat and lands that provide vast amounts of value as ecological services should be measured.

If there is consideration of the impact of amounts over \$500 million in a year on the private sector, then the impact on the public in gain or loss of public benefits, including ecosystem services must be included in Section III(1)i as well.

In Section VIII, parts 6 and 7 the economic analyses absolutely should not be exempted from peer review. Particularly if this economic analysis determines if a scientific assessment is highly influential. No economic assessment that has policy implications should be exempt. Unlike scientific assessments, most economic analyses are clearly policy oriented. Economic analyses on fiscal, monetary, employment, natural resources and land-use are virtually all policy oriented and very often have greater than \$500 million per year impacts on private industry and the public. Economic analyses should not be exempted.

In Section IX, OIRA with OSTP are noted as responsible for implementing the revised Bulletin. This is unacceptable to APEX and many public interest groups. Scientific peer review must be conducted within the executing agency. This would only entangle OIRA with all Federal agencies conducting scientific work. This would be economically inefficient and cause a great deal of meddling between agencies for no clear public

benefit. Why not delegate oversight to a scientific institution competent in these issues such as the American Association for the Advancement of Science or simply leave it as it is?

The goals served by this revised Bulletin must be in the public interest. We are concerned that FOIA access has been restricted in recent years and that there is an overemphasis on access to government processes and decisions by private vested interests and concern for their gains or losses in new regulations without real concern for the American public and future generations. The inclusion of public goods and services in Section III(1)i and removing the exemptions on economic analyses would at least give these revises changes greater balance for the public good.

Thank you for the opportunity to comment. Please call me at: 253-539-4801 if you have further questions for us.

Cheers,

David Batker
Director