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To: OMB_peer_review@omb.eop.gov

cc:

Subject: Office of Management and Budget Revised Information Quality Bulletin on Peer Review

To Whom It May Concern:

Attached for your consideration are comments from the U.S. Apple Association regarding the Office of Management and Budget's revised Information quality bulletin on peer review.

Please contact me by telephone at (703) 442-8850 or via e-mail at jcranney@usapple.org should you have any questions or require additional information.

Sincerely,
Jim Cranney

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May 14, 2004

Dr. Margo Schwab
Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget
725 – 17th Street, N. W., Room 10201
Washington, D. C. 20503

Re: Office of Management and Budget Revised Information Quality Bulletin on Peer Review

The U.S. Apple Association (USApple) is the national trade association representing all segments of the apple industry. Members include 36 state and regional apple associations representing the 7,500 apple growers throughout the country, as well as more than 400 individual firms involved in the apple business. USApple appreciates this opportunity to comment on the importance of incorporating nongovernmental expertise in regulatory decisions through the use of peer review.

USApple strongly supports the use of independent peer reviews in the scientific review of regulatory decisions. While federal agencies may have considerable scientific expertise, USApple believes the federal government can strengthen its scientific reviews by consulting nongovernmental scientists who have significant relevant experience with the science in question. Additionally, nongovernmental scientists may contribute significantly to the scientific evaluation at hand because of their unique understanding of the regulated industry and familiarity with industry practices.

USApple recommends federal agencies use science review panels, and that the panels be permitted to address an appropriately broad scope of issues to ensure that important aspects of the decision are considered. This scope should include an opportunity for scientists with significant relevant experience to comment on uncertainty and risk including risk management issues. Finally, USApple urges the greatest amount of transparency in regulatory decisions. Peer review reports should be published and the public should be permitted the opportunity to comment on peer review reports prior to the initiation of the rulemaking process and final regulatory decisions.

USApple appreciates this opportunity to comment on this important issue. Please contact me by telephone at (703) 442-8850 or via e-mail at jcranney@usapple.org should you have any questions or require additional information.

Sincerely yours,

James R. Cranney, Jr.
Vice President

cc: USApple Board of Trustees
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