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Subject: Proposed OMB peer review guideline comments

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From: Dortehea Zadig
To: OMB_peer_review@omb.eop.gov
Date: 10/28/03 3:35PM
Subject: Proposed OMB peer review guideline comments

The following comments reference the Office of Management and Budget's (OMB) Proposed OMB Bulletin and Supplemental Information Quality Guidelines as these related to major regulatory actions taken by the USDA's Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ).

In recent years various risk assessments and other scientific support documents developed by APHIS-PPQ in support of proposed regulatory changes have been challenged, sometimes formally in a court of law, as to their scientific credibility. A peer review process, appropriate to the particular situation, could serve to improve stakeholder confidence in the quality of science used to support APHIS regulatory actions since, by design, its intent is to validate any scientific studies or analyses conducted. The credibility of science reviewed is thereby enhanced as it conveys to other scientists, stakeholders, and the general public the knowledge that the work conducted has met accepted standards of rigor and accountability.

For these reasons, when significant and/or controversial regulatory changes are contemplated APHIS would likely only benefit from a peer review of the science used to support its proposed actions. Indeed, incorporation of a means to conduct external, peer review into the rulemaking process has at times been requested by APHIS's stakeholders. But to truly achieve these benefits, the peer review undertaken must be conducted independent of APHIS by the those entities or organizations with expertise in the particular scientific disciplines used and it must be an external review.

Whereas for transparency purposes it is reasonable that APHIS identify the reviewing organizations chosen, the actual reviewers should be anonymous. Without this protection neither APHIS nor OMB will not meet its objectives to make regulatory science more competent and credible. Unless the review can be conducted with genuine independence and objectivity the review is vulnerable to the appearance of a conflict of interest.

We hope these comments are helpful. Thank you for providing the opportunity to comment.

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