

January 9, 2004

Joshua B. Bolten, Director
Office of Management and Budget
725 17th Street, N.W.
NEOB Room 10201
Washington, DC 20503
OMB_peer_review@omb.eop.gov

Re: Proposed Bulletin on Peer Review and Information Quality

Dear Mr. Bolten:

As former regulators, we are writing to express concern about the recently published “Proposed Bulletin on Peer Review and Information Quality,” which, in its current form, could damage the federal system for protecting public health and the environment. We call on the Office of Management and Budget (OMB) to withdraw the proposal and engage in a thorough, open discussion about the role of peer review in the regulatory context with the scientific, public health, environmental and consumer communities.

On November 18, 2003, the Science, Technology, and Law Panel of the National Academy of Sciences held a workshop on the Office of Management and Budget’s proposal entitled “Peer Review and Information Quality.” The NAS invited a diverse group of scientists to comment on the proposal. Speaker after speaker warned that implementation of this proposal would lead to increased costs and delays in disseminating information to the public and in promulgating health, safety, environmental and other regulations, while potentially damaging the existing system of peer review. Many of the speakers noted that OMB had failed to identify a single report or piece of regulation that would have been improved had the proposed peer review system been in place.

Peer review is an important process. It’s too important to be addressed in a poorly conceived proposal.

The National Academies have examined this issue for the federal government in the past. In order to preserve the functioning of the systems through which the federal government protects the public’s health and environment, we strongly urge you to withdraw the proposed Bulletin and, instead, enlist the assistance of the National Academies in considering the appropriate systems of peer review of new scientific information.

Sincerely,
See attached signature page

Carol M Browner, JD
EPA Administrator
(1993-2001)

Robert B Reich, MA, JD
Secretary of Labor
(1993-1997)

Russell Train, JD
EPA Administrator
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Former Assistant Secretary for
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Former Assistant Secretary
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