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10/28/2003 05:28:23 PM

Record Type: Record

To: Mabel E. Echols OMB_Peer_Review/OMB/EOP

cc: "Watts, Harry" <wattsh@kfb.org>, "McPherson, Janet" <mcphersonj@kfb.org>

Subject: CORRECTED VERSION - Proposed Bulletin Under Executive Order 12866 and supplemental information
quality guidelines

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- peerreview.doc



Kansas Farm Bureau

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October 28, 2003

Dr. Margo Schwab
Attn: OMB_peer_review@omb.eop.gov
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th St., NW
New Executive Office Building, Room 10201
Washington, D.C. 20503

Re: Proposed Bulletin under Executive Order 12866 and supplemental information quality guidelines

Dear Dr. Schwab:

I write to you today on behalf of more than 41,000 farmer and rancher members of Kansas Farm Bureau in support of the newly proposed guidelines which will require all scientific documents used in significant rulemaking to undergo independent peer review. Independent peer review will offer greater consistency on the quality of science used in agency decisions.

We support a genuinely independent and objective peer review process comprised of qualified members from outside the agency for which the regulatory policies are written, thus avoiding any conflict of interest. We support rotational term memberships of the peer review board to consistently assure that fresh perspectives are being added. Members of the peer review board must not profit financially in any way from the agency being reviewed in order to assure the genuine independence of the review process.

We support a transparent peer review process, with reviewers being provided sufficient information so as not to narrow the review to a specific study, but to review the work product as a whole. We support publication of the peer reviewers' analyses and conclusions for public comment.

Our policy asks for sound science to be used when new regulations are imposed. We believe the peer review process would offer greater confidence in the scientific basis for new regulations. Thank you for the opportunity to comment on this issue.

Respectfully,

Janet McPherson, National Director
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