

August 15, 1995

EPA-SAB-EC-COM-95-004

Ms. Carol Browner  
Administrator  
U.S. Environmental Protection Agency  
401 M Street SW  
Washington, DC 20460

RE: Commentary on SAB Completing Peer Reviews

Dear Ms. Browner:

The Science Advisory Board (SAB) is pleased to serve you as a peer reviewer of technical Agency workproducts that are associated with some of the more contentious issues facing EPA. Recent examples of such reviews include the risk assessments for dioxin, environmental tobacco smoke, and electromagnetic fields. In addition, the SAB applauds your articulation of a Peer Review Policy that was issued in June, 1994.

We are writing to clarify our understanding of the application of the Peer Review Policy to reviews conducted by the SAB. Specifically, some people have read the Peer Review Policy as indicating that, once the SAB has reviewed an Agency document, the Board should not "take a second look" at the document following alterations made by the Agency at the suggestion of the SAB.

We believe that such an interpretation is incorrect and that, in many instances, the SAB's being able to assure you that the Agency position on an issue rests on "sound science" demands that the Board have the opportunity to examine how its advice was taken, interpreted, and used in the final document.

There are several reasons for our feeling so strongly about this point:


- a) The SAB is simply completing its job by seeing whether its advice has been appropriately understood. The Board acknowledges that perhaps not all of its advice will be taken. However, in such cases, it expects that the Agency will articulate the reason for not taking that advice.

- b) There is precedent for the re-review in that peer reviewers of journal articles are sometimes--but not always--asked by editors to review the re-drafted article to see if their original concerns have been addressed.
- c) There is also ample precedent in the operation of the SAB over the past 15 years.
- d) To proceed to a second, non-SAB panel for the subsequent review is to invite, at best, an endless loop of new changes--generally of second order importance--and, at worst, subjecting the document to double jeopardy, often at the hands of reviewers who are less well-versed in the some aspects of the subject than the first panel of experts.
- e) Strict exclusion of the primary reviewers is to guarantee a loss of historical perspective.
- f) By going to a non-SAB panel, the Agency would be subject to a charge of "shopping around" to find a panel of a particular bent.

As the record shows, more often than not, the SAB does not have the luxury of taking a second look. In part, this situation is connected with limitations on resources of our members and resources of the Agency to carry through reviews to that level of precision. However, for those particularly contentious issues, a final verification by the SAB is good for the Board, good for the Agency, good for the environment, and good for the public whom we all serve.

I appreciate your attention to this matter and your response to the concerns we have raised. We look forward to continuing the productive working relationship between EPA and the SAB in the future.

Sincerely,



Dr. Genevieve Matanoski, Chair  
Science Advisory Board