



March 12, 2009

Mr. Peter Orszag, Director
Office of Management and Budget
725 17th St NW
Washington, DC 20503

Re: Request for comments regarding Federal Regulatory Review (74 FR 8819)

Dear Mr. Orszag,

Thank you for the opportunity to provide comments on the proposed Presidential Executive Order on the Federal Regulatory Review process within the Office of Information and Regulatory Affairs (OIRA).

The American Institute of Biological Sciences (AIBS) is a nonprofit scientific association dedicated to advancing biological research and education for the welfare of society. Founded in 1947 as a part of the National Academy of Sciences, AIBS became an independent, member-governed organization in the 1950s. AIBS is sustained by a membership of some 5,000 biologists and nearly 200 professional societies and scientific organizations representing the breadth of the biological sciences. The combined individual membership of the latter exceeds 250,000.

Scientific integrity must be preserved during Federal Regulatory Review. Changes made to government regulations during the review process by OIRA should not change or contradict the science upon which the regulation is based. Changes of intent or interpretation to the underlying science made by OIRA for political reasons establish a dangerous precedent and force all stakeholders to question the integrity of the regulatory and rulemaking process.

The President should include provisions in the Executive Order to preserve scientific integrity during the Federal Regulatory Review process. More specifically, the Executive Order should:

- identify the preservation of scientific integrity as a fundamental principle of Federal Regulatory Review;
- ensure transparency of the process to make certain that the conclusions drawn by federal agency scientists have not been changed for political reasons; and,
- specify that any substantial changes made to regulations that contradict the underlying science are subject to review by an independent party.

Thank you for your consideration of our comments. If AIBS may provide further assistance to you on this or other matters, please contact AIBS Director of Public Policy Dr. Robert Gropp at

Sincerely,

A handwritten signature in black ink, appearing to read "R. O'Grady".

Richard T. O'Grady, Ph.D.
Executive Director

RTO: jpc