Echols, Mabel E.

From: n behalf of Stella Beckman
Sent: Tuesday, March 31, 2009 3:58 PM
To: FN-OMB-OIRA-Submission
Subject: comments

To Whom it May Concern:

I applaud the current administration and President Obama for the increased focus on transparency in regulatory decision-making, as well as the promise made in in the President's inaugural address that the position of science in policymaking will be restored to its rightful place.

In response to the request for comments on the OMB recommendations for a new Executive Order on Federal Regulatory Review, I have several recommendations that relate to environmental and health regulation:

- Provision of a method for ensuring that scienfic evidence is the primary consideration in regulatory issues relating to health and the environment (e.g family planning, HIV, climate change). If other factors, such as religious belief or economic concern are to enter the process, they must be considered secondary to scientific evidence.

- Increased attention to downstream effects of health and environmental regulations, particularly toxic substances regulation. For example, if a product or chemical is to be banned, what is the evidence for the safety of proposed replacements? While some downstream effects are analyzed in the present process, a more complete consideration is necessary.

- Consideration of regulations in the global context. It must be taken into consideration whether or not a regulation will shift health/environmental risks to another nation or area before regulations are made. It is not appropriate to encourage the shifting of risk to developing countries or underserved areas by creating regulatory or economic incentives for businesses to do so.

- Clarity and public availability of evidence considered in regulatory process. The decision-making process should be clearly documented in a format that is available to the general public, and the evidence that is used to support the decisions should be described and made available at the same time. While separate documents targeted towards an expert audience are important, other media should be utilized to convey the rationale for regulatory decisions to a lay audience.

Sincerely,

Stella Beckman, MPH (expected May 2009)