

Championing Balanced and Rigorous Peer Review and Stakeholder Engagement Processes

The chemical industry supports use of gold standard science to help America be stronger and more affordable. One way to do this is through federal assessments of chemicals. The public, businesses and regulators look to these assessments as a reliable source of information. These assessments focus on understanding the inherent properties of substances and potential exposures to determine the likelihood of harm – something we can all agree needs to be based on the best available science.

BALANCE EXPERTISE AND PERSPECTIVES: Peer review panels should be assembled in accordance with appropriate policies to achieve the required technical expertise, balance perspectives and geographic representation, and rigorously and fairly evaluate potential conflicts of interest.

- All peer reviewers should be:
 - fully independent from the program office issuing the assessment, including receipt of grant funding that could impact decisions.
 - free of conflicts of interest, both financial and non-financial, that could impact the outcome of the review.
 - nominated and selected after charge questions are finalized to ensure the panel has appropriate expertise based on the topics to be discussed.
- The peer review panel should:
 - have an appropriate and diverse balance of geographic representation and depth of disciplinary expertise needed to adequately evaluate the assessment under review.
 - be publicly announced at least 2 weeks in advance of the peer review panel meeting to ensure stakeholders are informed of the panel's composition.
 - include no more than 2 members who have participated on a previous peer review panel (if previously peer reviewed). Additionally, no panel members who have served on the previous review panel should act as chair of the current peer review panel.

PROMOTE TRANSPARENCY AND AVAILABILITY OF INFORMATION: Allowing adequate time for panelists to review public comments in advance of the peer review meeting lets the panel thoughtfully consider stakeholder input, enhancing the transparency, relevance, and credibility of the review process.

- All submitted written public comments should be provided to the peer review panelists at least 2 weeks prior to the peer review meeting.
- Draft assessment documents and charge questions that will be considered during the peer review should be provided to the public and the peer review panel at least 45 days prior to the peer review meeting.

ENSURE ROBUST STAKEHOLDER ENGAGEMENT: Providing adequate time for public comments during the peer review meeting is important to allow stakeholder insights and concerns to be heard and considered in real time, helping to inform and strengthen the panel's evaluation and recommendations.

- At the beginning of each peer review meeting, all public commenters should be afforded a minimum of 5 minutes each to provide their views and feedback.
- Prior to the conclusion of the peer review meeting, all public commenters should be allotted a minimum of 5 minutes to provide clarifications or additional feedback based on the peer review meeting discussion.
- The public comment period during the peer review meeting should allow time for comments on each relevant topic under review by the peer review committee, and public commenters should not be limited to a single comment opportunity when seeking to provide feedback on several different topic areas.

MAINTAIN THE INTEGRITY AND SCOPE OF THE REVIEW: It is important for a peer review panel to stay on task and within scope to ensure productive and efficient meetings that achieve the goals and objectives of the review.

- Before peer review begins, panelists should be informed on the scientific standards and procedures applicable to the review process for assessment being evaluated by the panel.
- At the beginning of each peer review panel meeting, the goals and scope of the review should be stated for the panelists.
- If during the peer review meeting, a panelist gets off task or scope, the assigned designated federal officer or the peer review chair should have responsibility for reiterating the task and scope to the panelists.
- Any use of assistive or generative artificial intelligence (AI) by the Agency or the peer review panelists should be transparently documented.

IMPROVE ACCOUNTABILITY AND RESPONSIVENESS: Processes need to be in place to ensure that public comments and peer review findings and recommendations are completely addressed and that legitimate scientific concerns are not disregarded.

- An independent accountability procedure should be implemented to verify that revised assessments are accurate and fully responsive to stakeholder comments and peer review recommendations.
- A 'response to comments' document should accompany the final version of the assessment which clearly delineates how public and peer review comments received on the draft assessment were addressed in the final version.

For more information on the Peer Review Process and Stakeholder Engagement, please visit www.AmericanChemistry.com