

Three CRE Principals for Engaging Outside Regulatory Support

Background

- CRE is routinely asked to delineate its recommendations for the principals which should guide corporate sponsorship of CRE activities or any other entity which could assist in the accomplishment of regulatory goals.
- The following principles have been developed over the past thirty years.

Principal I: Criticize Science Not Individuals

It is politically acceptable to criticize science; dangerous to criticize individuals. CRE has incorporated this principal into the operations of its Interactive Public Dockets¹ when it states: “Posts are time delayed, meaning they only go live after they are monitored to ensure the absence of profanity and no personal attacks on civil servants.”

Principal II: Pay for Third-Party Validation Not Third- Party Advocacy

Third-party validation consists of having an nationally recognized entity who has been engaged in a specified activity for a number of years to give credence to the positions taken by a corporate sponsor; in essence a regulatory Good Housekeeping Seal of Approval.

Third-party advocacy consists of asking any third-person however qualified, however recognized to promote the positions of a corporate sponsor.

Third-party validation is often exercised by watchdog organizations, NGO’s, academic centers of excellence and credentialed experts² who routinely offer opinions on a particular subject matter—not for hire personnel who seldom opine in a national forum without any continuity or without any transparency.

Principal III: Judge Agency Actions by Established Metrics-- Not Internal Views of Sound Science and Perform All Such Determinations in a Public Manner

CRE was the initial proponent of the Data Quality Act³ (DQA) in part to ensure that it never got bogged down in an “our science versus their science” controversy. Instead the DQA provides a statutory metric to judge an agency action in lieu of internally generated measures of sound science. Other measures include agency generated quality control measures. All actions should be made in a public manner and provide for public comment⁴.

¹ http://www.thecre.com/oira/?page_id=8

² http://www.thecre.com/quality/2006/20060914_quality.html

³ http://www.thecre.com/pdf/20120301_NavalLawReview.pdf

⁴ <http://www.thecre.com/forum13/>