Process Objectivity and Risk-Based Regulation

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Benefits = Mitigation of Risk
Budgetary Cost of Federal Regulation, Adjusted for Inflation
What's Wrong?

- Uncertainty Characterization?
- Sensitivity Analysis?
- Retro-Review?
- Causality?
- Peer-Review?
- Weight of Evidence?
Lack of Competition!
My RA says: regulate.

Mine says I’ll go outa business!
SAFETY FIRST
Science is objective when its “products— theories, laws, experimental results and observations—constitute an accurate representations of the external world.”
Science is objective “to the extent that, the processes and methods that characterize it neither depend on contingent social and ethical values, nor on the individual bias of a scientist.”
APPLY THE SCIENTIFIC METHOD!

- Regulatory RAs are Process Objective
- NRC, OIRA
- Redo Regulatory RAs
Conc.

Regulatory RAs are either consistent with guidelines and recommendations or not.
Consistent adherence to a process that is designed to produce objectivity will yield objective results.
To Test Process Objectivity

Step 1: Identify What to Follow

Step 2: Ensure Consistent Application
Step 1: Identify What to Follow
Step 1 – NRC Recommendations
Step 1 – Federal Guidelines

- OMB’s 1995 Principles
- OMB’s 2007 Principles
- OMB’s Final Information Quality Bulletin for Peer Review (Peer Review Bulletin)
- OMB’s Information Quality Guidelines
- The Safe Drinking Water Act
ANALYSIS

CATEGORIES OF AN OBJECTIVE RISK ASSESSMENT

REVIEW OF AN RIGOR OPENNESS
Step 2: Ensure Consistent Application
I wrote it!

I’ll review it!
My RA says: regular
NoLine says: Outa Business!
“For a successful technology, regulation, reality must take precedence over public relations, for nature cannot be fooled.”

-- Richard Feynman (Rephrased)