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STATEMENT FROM THE PERCHLORATE INFORMATION BUREAU (PIB)

RE: OEHHA's Peer Review Reports on Draft Perchlorate Public Health Goal

According to [comments submitted by the Perchlorate Study Group \(PSG\) and the Partnership for Sound Science in Environmental Policy \(PSSEP\) on Dec. 23](#), the California Office of Environmental Health Hazard Assessment (OEHHA) has engaged in processes and procedures in conflict with state law governing scientific peer reviews.

As the parties requesting the peer reviews on OEHHA's draft perchlorate Public Health Goal (PHG), PSG and PSSEP, along with the people of California, should have every reason to expect that OEHHA's peer-review process be conducted according to the law. Unfortunately, the agency has not lived up to this expectation. Specific concerns include:

- The lack of depth and precision of the charge questions asked of the peer review panel appear intentionally designed to elicit only information which could be used to support the draft Public Health Goal (PHG), directly disregarding the purpose and requirements of [California Health & Safety Code Section 57004](#). Specifically, OEHHA failed to charge peer reviewers with examining the foundational science upon which the PHG is based, which calls the entire purpose of the peer review into question.
- The professional biographies of the three external peer reviewers clearly evince that the peer review panel did not include experienced practitioners in the fields of epidemiology, risk assessment or toxicology, despite what the law requires. [Health & Safety Code section 116365\(c\)\(1\)](#) states that the PHG risk assessment must be based on principles and practices used by experienced practitioners in these fields.

Importantly, none of the peer reviews disputed what has been widely accepted in the scientific community: perchlorate at environmental levels (below 245 parts per billion) has no measurable effect on human health.

The PSG's comments build on to [comments filed in February 2011](#), which stressed that the agency's rationale for a new PHG falls far short of OEHHA's directive to use the best science in setting public health goals.

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