

**The Wildlife Society • American Fisheries Society • Society for Conservation Biology
Society of Wetland Scientists**

The Honorable Ken Salazar
Secretary
U.S. Department of Interior
1849 C St NW
Washington, DC 20240

1 June 2010

Dear Secretary Salazar:

The undersigned organizations, representing over 31,000 scientists and natural resource professionals, are writing to you regarding the recent report issued by the Inspector General (IG) and concerning the lack of a scientific integrity policy at the Department of the Interior (DOI).

Science, as you know, is the foundation upon which natural resources management must stand to responsibly manage and sustain this nation's limited resources, including fish and wildlife populations. Science must guide natural resource management and conservation decisions, other input factors must be added and evaluated, all options identified, potential consequences fully understood, and the final decision justifiable and legally defensible. The science that informs these decisions must be clear, transparent, and subject to independent peer review. The public then deserves to be fully informed about these resource decisions, particularly those that may run counter to best available science, and to understand the role science plays in the decision-making process.

The IG report, released on the 28 April 2010, said that the DOI never has had, and continues to operate without, a scientific integrity policy. This is despite the fact that DOI's mission is to protect and preserve the nation's natural resources. Accurate and reliable scientific programs are part of that mission. The strategic mission additionally states that "integrity must remain the foundation of all Department of the Interior science: impartiality, honesty in all aspects of scientific enterprise, and a commitment to making that information available to the public as a whole." Indeed even you yourself, when instated as Secretary of the Interior in 2009, vowed to lead DOI with respect for scientific integrity. The report notes that DOI has already found itself in situations in which there has been a need for a scientific integrity policy, but because it lacked such a policy, was unable to handle these situations properly and consequently garnered media and congressional scrutiny.

Without a transparent and ethical process for dealing with scientific research and scientific conduct, the science that is performed at DOI may continue to be called into question. This will not only harm the reputation of DOI, but will threaten the conservation of the nation's treasured natural resources. Therefore, to ensure that the science is being used properly to implement natural resource decisions, science that contradicts these decisions should not be suppressed, scientific misconduct should be punished, and scientists who report suppression or other scientific misconduct should be afforded whistleblower protections.

We agree with the recommendations provided in the IG report. First, while we applaud USGS for having a scientific integrity policy, we agree that individual bureau-by-bureau integrity policies are not sufficient, and a DOI-wide scientific integrity policy that addresses elements of the Office of Science and Technology Policy (OSTP) scientific research misconduct policy must be developed. Such a policy would apply to all research coming out of the agencies within DOI and will provide credibility to all science being performed at DOI, not just that of a few individual agencies. Second, a responsible official must be delegated to guide the implementation, development, and application of such a policy across the agency. Such actions will make the science more transparent, protect DOI scientists, and will improve the objectivity and reliability of the DOI scientific enterprise as a whole. Additionally, we would also recommend that an agency-wide policy be in place which specifically addresses peer review; while the USGS has a peer review policy, there must be a way to ensure that all science that is performed at DOI is reliable and of the highest caliber, and it is important that all scientific findings be subjected to an independent, external peer review process. And finally we recommend that DOI use a transparent process to inform the public when there are disagreements between science and preferred natural resource policies so that the public and congress are informed of the risks to natural resources that they care about.

Overall, we recommend that the Secretary initiate a process that addresses, but is not limited to the recommendations in the IG report. We suggest that a science integrity policy be developed with the participation of DOI science advisors, ethics officers, scientists, and the general counsel within DOI. Such a team should consult with policymakers within the OSTP, the Council on Environmental Quality, and Office of Government Ethics to create a draft within the next several months that will be available for public comment.

Thank you for your attention to this matter. We will submit further specific recommendations in the future as the process continues. In the meantime, we look forward to the development of a comprehensive scientific integrity policy for the Department of the Interior, and hope to be able to play an active role in the development of such a policy.

Sincerely,

The Wildlife Society

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