

benefit from **cooperation between** federal, academic, and private scientists and researchers in producing the report” and explains in some detail the “benefit” of the report to public and private organizations (emphasis added). It then states

The production of the document will be best served by an exchange of resources and substantial involvement between USDA, other federal agencies, and a cooperator (including activities such as drafting, providing reviews, financial assistance, and technical input). Based on these considerations, USDA decided to pursue the production of this report through a cooperative agreement.

Development of SAP 4.3 will require an interdisciplinary group of lead and supporting authors with expertise and experience directly related to the subject matter. The cooperator, in coordination with USDA, will select a convening lead author and lead authors for each chapter of the report, consistent with the . . . required expertise. The public may submit nominations for consideration.

USDA will publish the biographical information for the convening lead author and lead authors in a Federal Register notice. The convening lead author and lead authors for each chapter of the report—organized by the cooperator, will draft answers to the five key questions addressed in the product. (Emphasis added.)

While we do not question that there could be significant benefits to a wide variety of organizations, both public and private and including business and industry, from this SAP 4.3 report, it does not follow that those “considerations” justify or support a decision by the USDA -- which from the context the draft has apparently already been made -- “to pursue the production of the report through a cooperative agreement.” In addition, while we could agree that the “production of the document” could be well-served “by an exchange of resources and substantial involvement” of USDA and other “Federal agencies,” it does not necessarily follow that such “production” is also “best served” by a “cooperator.” To our knowledge, the several other CCSP SAPs have not engaged private contractors for the development of reports.

Moreover, the draft fails to either explain the criteria for engaging a “cooperator” by cooperative agreement or indicate when and how that person or entity was or

could be selected.

Clearly, such a person or entity should not be involved in any way with drafting, "providing reviews" or providing "technical input." As to the reference to "financial assistance," we do not understand what financial assistance could be provided by such cooperator or why it is needed. In short, the use of a cooperator is not sound and should be abandoned."

Response: Several other SAPs have engaged outside expertise. The range of involvement of outside expertise has varied from experts that participate on Federal Advisory Committees to contractors that are responsible for all aspects of product preparation. For example, SAP 2.2, The North American Carbon Budget and Implications for the Global Carbon Cycle, will be prepared under contract. The final prospectus for SAP 2.2. states that "the funding award for SAP 2.2 has been set up such that the U.S. Government will not exert management or control over the activities of the contractor nor will U.S. Government officials play a role in selecting authors, holding meetings, setting the agenda, or drafting the final report".

The Guidelines for Producing CCSP Synthesis and Assessment Products (SAP Guidelines) states that:

To ensure that the products incorporate as much expertise as possible, the lead agency(ies) will be open to the participation of other individuals or entities with relevant expertise and information. The entities can include other government units (Federal or non-Federal), Interagency Working Groups of the CCSP or other Federal programs, international organizations and government units, non-governmental organizations (NGOs), and other groups.

A variety of mechanisms are being employed to produce the 21 SAPs to ensure that the products incorporate expertise found outside of the government. USDA's decision to pursue a cooperative agreement was, in part, due to the broad scope of the material to be addressed in SAP 4.3 and the benefits from engaging outside expertise in cooperation with Federal experts.

According to the SAP Guidelines,

"the lead agency will be responsible for developing an open and transparent process for soliciting user input, author nomination and selection, expert peer review and public comment, and production/release of the products, as described in these guidelines."

