

WSPA and API Comments on ISO Peer Reviewer Qualifications  
February 15, 2011

The Western States Petroleum Association (WSPA) and the American Petroleum Institute (API) offer the following comments on the document posted by Cal Recycle entitled: "ISO Peer Reviewer Qualifications" (undated):

- We assume these constraints are to be applied to the selection of the chair of the peer review panel and not applied to all members. The UOTF believes it is essential that the peer review panel can draw on relevant experience – and in this case the ability to draw on relevant industrial or process-related expertise is as or more important than experience in producing LCA.
- As per comments made at the stakeholder meetings in January, LCA is a tool that can be readily and relatively simply applied to comparisons between two equivalent products or parts of a production life-cycle. It is much more complicated and involved to produce genuinely helpful and comprehensive assessments of complex systems (such as the management of all used oil in the state of California) and where waste management is to be considered. There are added complexities in setting up the appropriate boundaries, developing suitable functional units and understanding all the interactions and offsets in all the affected systems.

Therefore, we reiterate our assertion that the peer review should explicitly seek expertise in complex, waste-related life cycle studies in at least one member of the panel, preferably the chair.

- We do not completely understand where Cal Recycle intends to draw the line on potential conflicts of interest. We strongly endorse an explicit requirement that there are no conflicts of interest for the peer review contractor and peer review panel, but believe these should not be defined as "no conflicts of interest with any of the parties involved in this project". The wording is not clear. There should be no conflicts of interest that impact carrying out the role of independent peer review of the life-cycle analysis.

WSPA and API note that similar requirements with regard to experience of complex waste management LCA studies and absence of conflicts would also apply to the practitioner or practitioners in the studies.