because it overwhelms its audience with information, but because it challenges the reader to think in novel directions – in this case to question previous assumptions about the mission and functions of parks in our society.

***Risk Regulation at Risk: Restoring a Pragmatic Approach* by S.A. Shapiro and R. L. Glicksman. Stanford, CA: Stanford University Press, (2003), xii + 265pp.**

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This work offers a defense of risk regulation in the U.S. against a rising chorus of critiques from neo-realists who tout cost-benefit approaches as the best way to balance the wide array of interests and stakeholders in regulation of risk industries and polluters. While the focus is nearly entirely on legal aspects of risk regulation, the authors do attempt to ground their approach in pragmatic principles. Pragmatic critique is used as both a partial foundational philosophy for risk regulation and a methodological basis for a series of reforms of risk regulation. The approach of the book is to counter claims that have been brought against risk regulation by some economists and conservative think tanks of its being 'irrational,' in that such regulations often impose solutions to risks that end up being quite costly.The main arguments of the book are set out in recursive fashion, beginning in Chapter 2 with a brief overview of pragmatism and how it relates to risk regulation.

Chapter 3 outlines some of the key terms of current risk regulation (e.g. statutory standards and risk thresholds) and how they work in practice, arguing that the U.S. Congress has rightly rejected cost-benefit approaches. Chapter 4 outlines the link between pragmatism and the current approaches, showing how pragmatism is more attuned to the multidisciplinary nature of risk and decision-making involving risk. Chapter 5 introduces some of the key critics of risk regulation and their arguments and flaws while Chapter 6 analyzes the different valuation methods that are used, undermining some of the critics' claims about risk as being limited by various factors that extend beyond simple utilitarian reduction of risks to costs and benefits. Chapter 7 focuses on regulatory impact analysis arguing for qualitative data to be included along with quantitative. Chapter 8 proposes incremental decision-making to overcome the problems of over-regulation and the excessive time that it takes to implement a complete and comprehensive regulatory scheme, while Chapter 9 addresses the different functions of the executive, judiciary, and legislative branches of government and how to make them act in concert and not against the "relative competence of … agency decision-makers" (p.206).While the amount of material covered is quite impressive, the argument setting out the pragmatic basis for risk regulation I found to be somewhat thin.

The bulk of this discussion is laid out in Chapter 2, but is occasionally referenced in later chapters. While John Dewey is cited several times, this is done entirely on the basis on secondary sources. It becomes clear that the point of the chapter is to briefly lay out a framework which will allow the authors to argue that, in the context of American political discourse, the pragmatic tradition, taking into account 'bounded rationality,' is the most suitable for reaching optimal results. Further, such pragmatic-based policies can always be adjusted, "on the back end" as they put it, in light of new data or evidence that shows that there is either too much or too little regulation. Nevertheless, the authors want to argue that idealism is not abandoned by such an approach, in that "pragmatism's commitment to being open-minded [does not] require one to abandon passionate beliefs" (p. 29).Much of the remaining chapters of the book outline the methods by which risk regulation has worked in the U.S. since its inception in the 1960s and 70s, and counters the claims of utilitarian critics who want to reduce the costs and burdens of current regulatory controls. In general, the authors are skeptical of reduction of risk to economic models, because this "gives the upper hand to economic analysts and discourages non-economic input" (p.60).

Quantification becomes the only measure to solve risk disputes, whereas, in contrast, the authors place a high value on the benefits of arguments across a range of disciplines. I would add that their view is also somewhat blinkered by the reliance on pragmatism, but this doesn't detract from the more than a few important insights that they make regarding economic analyses.The first point is that there are many benefits of regulation that cannot be easily quantified. A second point is that assessing the cost of any given risk regulation can be done in different ways, as exemplified by problems with a 'willingness to pay' model that is often employed to determine the objective value of risk protection. In many cases, such a willingness to pay is dependent on the wealth of an individual. Workers in high risk professions are often paid low wages and thus have little margin to pay for additional protection (p. 99-100) and as a result willingness to pay will be quite low. Third, the standard economic practice of 'discounting' depends on certain assumptions about what expectations people have about the future. The rate of discounting, which can vary anywhere from 2 to 12 per cent, can make the difference in many cost benefit analyses between reasonable and unreasonable costs. Not surprisingly, the authors favor a smaller rate of discounting than the critics.The last three chapters of the book move the discussion into the realm of how regulation actually transpires and is impeded or facilitated. Here, they argue that many 'regulatory impact analysis requirements' have exceeded their utility.

In recent years, Congress has underfunded the regulatory agencies and regulation is slowed and weakened. As a measure of getting around these problems, they advocate 'incremental' decision-making and 'back-end adjustment,' a process by which periodic review can be undertaken.While the approach outlined here is comprehensive and the material fairly easy to digest, one has to wonder how much the lay public is really going to be able to get involved in what are very technical types of debates and processes. Shapiro and Glicksman seem to be addressing themselves to similarly minded researchers and policy professionals who are eager to maintain and improve the regulatory administration that has been fashioned over the past 35 years or so but which is increasingly under attack by economistic and utilitarian analyses encouraged by the current U.S. administration's favorable view of big business. They make nods to public participation but they have little to say on how this would work; there is no real description of a public in this book.

On the other hand, the focus is clearly on the machinery of government and thus it is very timely in providing a guide to what is useful about risk regulation and what is flawed in many of the risk regulation critics' books and articles. One could also question whether their argument is too pragmatic in that it seems to evade a political dimension.Another kind of critique of technical risk analysis that has been made over at least the past decade is that it can never achieve the level of objectivity that it frequently aspires to provide. While Shapiro and Glicksman have grounded this work in a pragmatic philosophy, one that is unfortunately hardly expanded on in the conclusion, they also fail to acknowledge any of the recent and growing body of work in sociology of risk such as Ulrich Beck (1992) or Strydom (2002), just to name two works, one very well-known and one very recent. They might argue that their book is focused on regulation and law, but it seems a little surprising to this reader that there is not even a reference to such work, critical as it has been of the separation of technical and social domains.

As a reader who is interested in these issues, both in my country of residence (Japan) and in the U.S., I would have liked at least a little mention of the role of the U.S. in the world in regard to risk regulation. Are these trends towards chipping away at and weakening risk regulation unique to the U.S. or in some way mirrored in other parts of the world? It would certainly take another or different book to answer this question, but the authors don't address the 'bounded' aspect of their focus on risk regulation in the U.S., which is somewhat peculiar in that risk, as Beck has argued, escapes its 'natural' borders. One further point that I found annoying was the authors' use of Professor for some of their citations. I didn't do a count of these titular references but it appeared that Professor was more likely to be used when they were quoting approvingly.

In conclusion, I would recommend this book to those who wish to know more about risk regulation and the debates that are taking place over how to reform such policy institutions. Such information is likely to be important for greater numbers of citizens if they are to continue to value risk regulation in the face of counter pressures to commodify and turn risk into little more than a cost benefit zero sum game.References Cited:Beck, U. (1992). Risk Society. London: SageStrydom, P. (2002). Risk, Environment and Society. Buckingham: Open University Press.