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VISTA

September 16, 1991

Ken Conover, CIH
Supervisor, Industrial Hygiene
Owens-Corning Fiberglass
Fiberglass Tower OLEC/2
Toledo, Ohio 43659

Dear Ken:

Below is my attempt to summarize my concerns with the Code of Ethics and it's application to the practitioners of industrial hygiene.

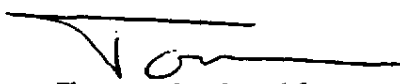
1. Content of Code - The code elements may not accurately reflect the diversity of activities of our profession as it has evolved since the Code was written. In particular the public service (read-consultants) part of the profession has greatly increased. This may necessitate some Code wording changes. This is probably the easiest concern to address.
2. Multiple IH Professional Groups - This problem, our IH alphabet soup, greatly complicates the application, enforcement, and educational issues associated with the current, and any revised Code. The enforcement issues are clearly outlined in your 8/15 letter to the Ad-Hoc (I hope) Committee. The application and educational issues involve communicating to multiple and diverse groups in a timely and efficient manner.
3. Significance of Ethics Actions - I am concerned that even if we resolve the enforcement issues the impact of actions taken will be insignificant, except for perhaps consultants. If we believe people don't understand what an IH is or does, how will anyone outside the profession, or a direct employer, understand the significance of an IH ethics action?
4. Ethics Enforcement Body - Even when the mechanics of enforcement are ironed out, who will do it. Having served on the AIHA ethics committee I must say it is an undesirable function and becoming a fearful one in our litigious society. These concerns would only increase if ethics activities increase.
5. Member Education - A concerted outreach or education effort would be needed for all memberships to gain understanding of ethics obligations, principles, and enforcement procedures.

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I also have a general concern that we need to do a thorough job of understanding how the other professions (doctors, layers, etc.) run their ethics programs before we "reinvent the wheel".

Sincerely,



Thomas G. Grumbles, C.I.H.
Manager Environmental Affairs

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