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The So-Called "OSHA Generic Standard on Carcinogens"

This editorial is entitled as it is because the complete title of OSHA's proposed regulation is so complex that everyone looked around for a meaningful, yet brief, substitute which would be universally understood.

On May 16, a prolonged series of hearings on this proposed standard was begun in the Labor Department Auditorium on Constitution Avenue in Washington, D.C. The hearings were scheduled to terminate on Tuesday, July 25. Since several hundred people requested to testify, and so many expressed an interest in questioning those who did testify, special rules for questioning and a specific order of six separate groups of questioners were established. From this it is evident that OSHA's generic standard on carcinogens has evoked a great deal of interest. That there will be divergences of viewpoints goes without saying. It can only be hoped that such divergences will be accepted without acrimony, and with full understanding that a subject as complicated as carcinogenesis is bound to bring forth such divergences.

By coincidence, the May 12, 1978, issue of the *Journal of the American Medical Association* (JAMA 239:2004-2011, May 12, 1978) contained a most interesting article by William M. Wardell, M.D., Ph.D., of the Department of Pharmacology and Toxicology of the University of Rochester School of Medicine and Dentistry. Although not dealing with carcinogens, Dr. Wardell's article did discuss the tactics used by the Washington bureaucrats in order to obtain their way. The three principal tactics outlined by Dr. Wardell were obfuscation, smear tactics, and straw men.

From what I know of reading OSHA's proposed standard, and from what little I have been able to read of the hearings held so far, these same tactics are being applied to anyone who opposes OSHA's proposal. The obfuscation arises in the preamble to the proposal, where OSHA implies that there is a great epidemic of cancer developing among our people and this is due principally to exposure to industrial chemicals. Thoughtful students of cancer such as Higginson, Wynder, Weisburger, and others have spoken out on this subject on numerous occasions. Their only conclusion is that such brash statements only obfuscate the real problems of carcinogenic mechanisms, thereby diverting our attention from potential areas where real progress in cancer prevention can be anticipated. Smoking, the consumption of alcohol, the "affluent" diet (too much fat and too little fiber) and bizarre sexual behavior (too early intercourse with too many partners in the case of females) have all been associated with excesses of site specific cancers far greater in magnitude than some admittedly occupationally-caused cancers. It has always seemed to the thoughtful student that putting major effort in the solution of major problems is a far more rational approach than putting major effort into solving minor problems. This is not to say that minor problems should receive no attention whatsoever.

Smear tactics are well-known also, and freely used by those supporters of OSHA's position, if not by OSHA personnel themselves. Anyone who endorses a position differing from that of OSHA must be the paid prostitute of industry whose only concern is to accumulate its profits by walking over the dead bodies of its employees. Such smear tactics ignore our lack of knowledge, both present and past, and blame management for deliberately producing cancer with reckless abandon among its employees. Unfortunately, it must be confessed that there is a small group of managers who may hold such viewpoints, just as there are unprofessional physicians, unethical lawyers, and unthinking academicians. But does this mean that all people who hold different viewpoints than your own are unethical or beholden to those persons who pay their salaries? For 30 years I worked for a large corporation (now retired, but on a lump sum payment so that I am now beholden to them in no way at all) and not once did anyone tell me what to say or think. Have those who are so quick to smear others examined their own past experiences to assure themselves they were not influenced in their thinking or actions by a superior, be he dean, department head, chancellor, university president, or even the President of the United States?

The straw man tactic assumes that anyone who opposes OSHA's proposal is either out to destroy OSHA completely, or to so hinder its activities that it becomes ineffective in accomplishing its objective, in this case preventing occupational cancer. In reviewing the counterproposals that have been put forward, and I believe I have read almost every significant one, not one has suggested that OSHA be dismantled. Not only that, but everyone has been sympathetic to, and endorsed the objective of OSHA. All they have proposed is that there is a different way to get there than the way OSHA has proposed. They all endorse the concept of minimizing the occupational cancer risk, although they all acknowledge that there can be no guarantee that the risk can be totally eliminated, short of banning the manufacture and use of any and all carcinogens, a patently impossible course which even OSHA and OSHA's staunchest supporters acknowledge.

It was a long time from May 16 to July 25. Many millions of words were written and spoken. Even after July 25, another 15 days were permitted for the submission of additional comments and then another 35 days for participants to submit written comments, summations or briefs. One can only hope that the unfortunate person who has to sift through all this voluminous material will be able to sift out the obfuscation, smear tactics, and straw men and be able to come to a decision based on facts which will do the most good for the working man. After all, he is the one this is all about.

Robert E. Eckardt, M.D., Ph.D.
Editor