Air Products

CONFIDENTIAL

Date 22 February 1984

INTEROFFICE MEMORANDUM

Subject American Industrial Health Council Membership

To P. L. T. Brian — Executive (Location, Organization, or Department)

From A. J. Diglio — Corporate Environmental Activities (Location, Organization, or Department)

Edward Donley serves as a Director of the American Industrial Health Council (AIHC). Since his term expires in October 1984, he has asked that I review with you the following:

Whether APCI should continue to participate; and

In the event APCI does continue, who, other than himself, should he suggest as APCI's representative to AIHC's Board?

To facilitate the transition, the decisions on the above should be made in sufficient time so that APCI's proposed representative has an opportunity to attend the next board meeting on May 17, 1984.

Please find attached a Background Summary, an Updated Board Membership List, and an AIHC report to the board membership.

Please let me know when it is convenient for you to discuss the above.

A. J. Diglio

AJD:csb

Attachments: Background Summary
AIHC Board of Directors
AIHC Report to the Board Membership

(320)

Background Summary

AIHC was organized in 1977. Its role is institutionalizing "the use of sound science in the development of national chronic health hazard policies". It has an operating budget of about $1.5 million/annually contributed by approximately 70 member companies. AIHC is incorporated as a tax exempt 501(c)6 organization. It has no permanent staff of its own or offices, but utilizes SOCMA's resources.

AIHC functions by utilizing task forces and committees composed of member company experts. The Board members propose and set policy for AIHC. Their is an Executive Committee of 5 board members including the Chairman. Indications are the organization is effective in delivering its message to the administration and certain legislators.

APCI was one of the organizers of AIHC. Dick Flemming was a Charter Director, 1977 to 1980. APCI's contribution for 1984 was $25,000. In 1985, it will increase to $30,000.

Edward Donley is currently a board member whose term expires October 1984, who chooses not to continue as a Director. A director's term is for three years. However, he may choose to be re-elected.

The Board of Directors meet four times a year--February, May, August, and November usually in Washington, D.C. In 1984 the remaining dates are May 17, August 30, and November 29.

AIHC's Executive Committee meets about seven times a year--February, March, May, July, August, October, November. The nominating committee selects new board members and proposes them to the November Board. However, new candidates for existing directors may be proposed prior to this time. AIHC desires that new candidates attend a few board meetings prior to their election.

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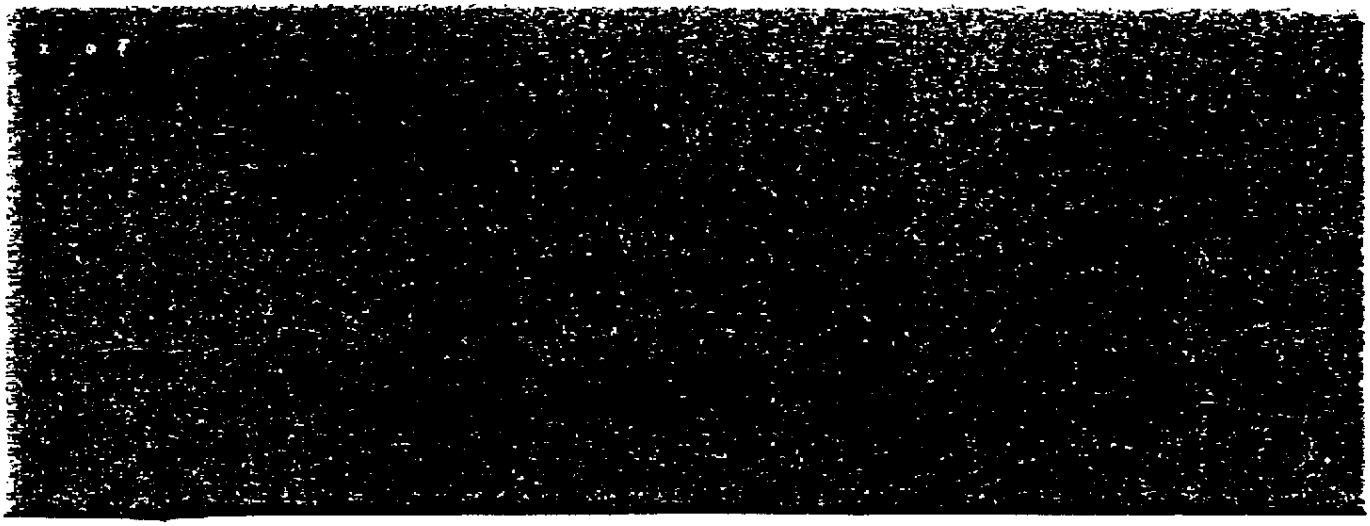
REPORT TO THE MEMBERSHIP 1983

American Industrial Health Council

Ensuring Sound Science in the Development of National Chronic Health Hazards Policy



The American Industrial Health Council is a coalition of industrial firms and trade associations concerned with ensuring that the best available science is used as a basis for the regulation of substances which pose significant chronic health risks to people or the environment. We believe that reliance upon sound science throughout the regulatory process results in effective and reasonable regulation, when regulation is warranted.

MARCH 1, 1983: "We recommend that regulatory agencies take steps to establish and maintain a clear conceptual distinction between assessment of risks and consideration of risk management alternatives; that is, the scientific findings and policy judgments embodied in risk assessments should be explicitly distinguished from the political, economic, and technical considerations that influence the design and choice of regulatory strategies."

from a report by the National Academy of Sciences/National Research Council — Risk Assessment in the Federal Government: Managing the Process

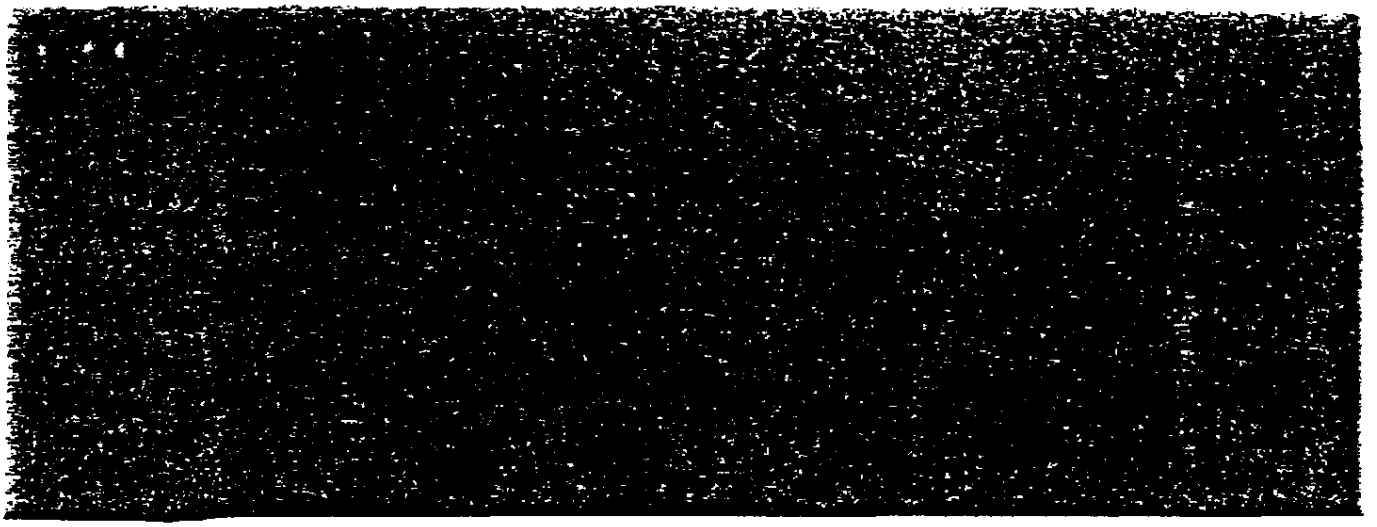
JUNE 22, 1983: "It is my strong belief that where EPA or OSHA or any of the social regulatory agencies is charged with protecting public health, safety or the environment, we should be given, to the extent possible, a common statutory formula for accomplishing our tasks."

"I further believe we should make uniform the way which we manage risk across the Federal regulatory agencies. The public interest is not served by two Federal agencies taking diametrically opposed positions on the given health risks of a given toxic substance and then arguing about it in the press."

EPA Administrator William D. Ruckelshaus

SEPTEMBER 26, 1983: "The public must have confidence in the adequacy and independence of the scientific basis of Federal regulatory actions. Moreover, public credibility of regulatory decisions will be enhanced if those regulatory decisions are based upon the latest and best science available."

Congressman James G. Martin



1983 LEADERSHIP AND STAFF

BOARD OF DIRECTORS

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Richard H. Lee
AIHC Vice-Chairman
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Standard Oil Co. (Indiana)

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E.I. duPont de Nemours & Co., Inc.

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Hunter W. Henry
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Lydia Calvello
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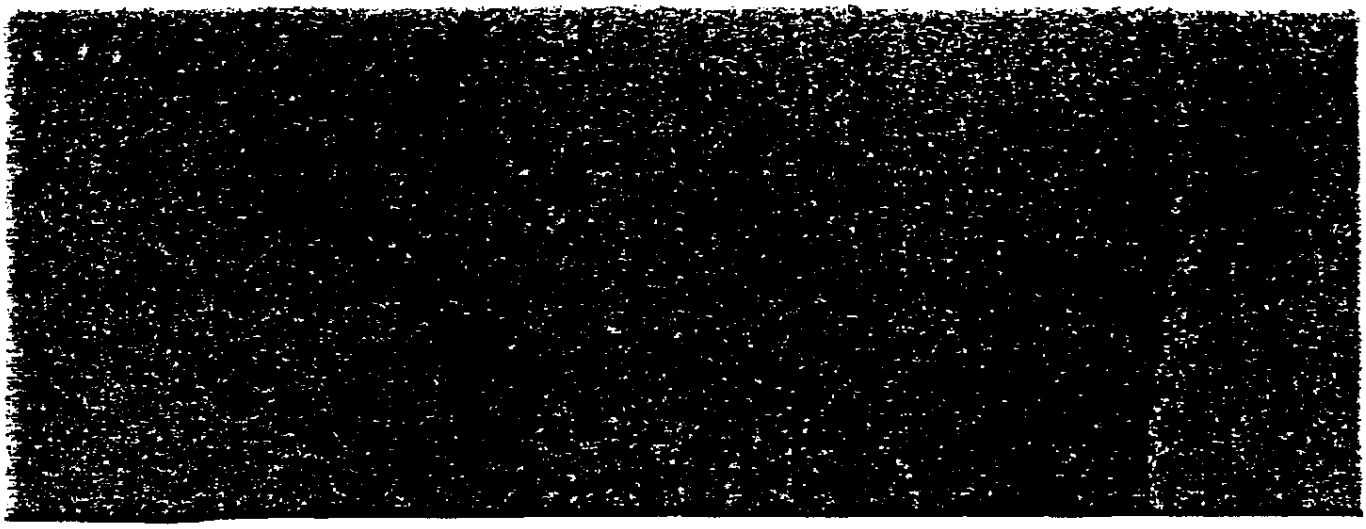
*Executive Committee Member
Chairman, AIHC Executive Committee

CHAIRMAN'S REPORT: AIHC PROGRESS AND RESULTS

"1983 was a banner year for AIHC — a year that saw the 'good science' message make substantial inroads into all three branches of government. It was also a year that brought into reality a number of concepts that AIHC has promoted since its founding six years ago."

George J. Sella, Jr.



FOCUS ON RISK ASSESSMENT – One of the first major events of the year was the release of the National Academy of Sciences report on risk assessment. After more than one year of study, the NAS came out in strong support of the need for a sound scientific base in regulatory decision-making. The report called for a clear distinction between the quantitative assessment of risks and the evaluation of risk management options. Although there are areas where we differ with the NAS report, it is basically consistent with AIHC's overall philosophy.

SCIENCE PANEL BILL INTRODUCED – The NAS report led to a second significant event — introduction of legislation to create a central science panel along the lines of what AIHC has proposed. This important bill focuses on sound science as a base for regulatory decisions. The bill goes an important step further than the NAS report, which recommended that such a panel only develop guidelines for risk assessment. Congressman James Martin, the *bill's author, calls for the creation of a central science* panel – one of AIHC's primary objectives for us, the proposed law is the culmination of extensive efforts by AIHC to promote this concept. Since its introduction in September, the proposed legislation has been reinforced with Congressman Don Ritter's bill on risk assessment demonstration projects and currently enjoys strong bipartisan support.

SOUND SCIENCE IN THE COURTS – A third event of importance to AIHC members was the decision of a federal court to overturn the Consumer Product Safety Commission's ban on urea-formaldehyde foam insulation. Many times the decision as significant in that for the first time a judge examined the underlying science and declared it imprecise and inadequate. The conclusions used by the agency, the court said, did not provide substantial evidence to support a finding of unreasonable cancer risk. Since CPSC risk assessment models the same as one used by EPA and OSHA, the court's decision may have far-reaching consequences.

I believe that we can take a great deal of pride in these developments. It is because of our aggressive promotion of the sound science message and a central science panel that these concepts have gained the kind of recognition they have.

AGENCY SCIENCE PANELS – We must continue to take the initiative. In 1983, we submitted our proposals to Congress to establish science advisory panels, located within EPA, to review risk assessment procedures under the Resource Conservation and Recovery Act, the Clean Water Act and the Safe Drinking Water Act. The panels would provide EPA with unbiased, independent scientific evaluations as it develops regulations and standards on chronic health hazards.

STATE ISSUES – We continued to offer our services and expertise to organizations which are addressing chronic health hazard issues at the state level. To date, we have been active in California, Louisiana and Maine by providing advice on scientific and legal issues and media relations.

...we are the only trade organization that represents a broad spectrum of industry support for the concept of sound science.

AIHC PROGRESS AND RESULTS – It's been through dedicated hard work over the past six years that AIHC has gained the respect of government scientists and regulators, and I believe we have made significant progress.

- Our scientific and legal advice was instrumental in OSHA's decision to reconsider its generic cancer policy.
- We have supplied scientific expertise to assist other federal agencies in their efforts to develop guidelines for a national cancer policy.
- We played a major role in assisting Government in its assessment of the state of the art of the science for cytogenetic screening and surveillance in the workplace.

In all of these public policy debates, we are the only trade organization that represents a broad spectrum of industry support for the concept of sound science. It is gratifying to see the importance of that philosophy gaining momentum.

But there is still much work that lies ahead. One of the toughest issues facing us over the next several years is the push to compensate those living near toxic waste sites. The application of good science will be critical in evaluating the potential or actual dangers of those sites. And unless we are successful in securing a sound scientific basis for establishing causation, industry will find itself burdened with a tax that is based on public fear and misunderstanding rather than on sound science.

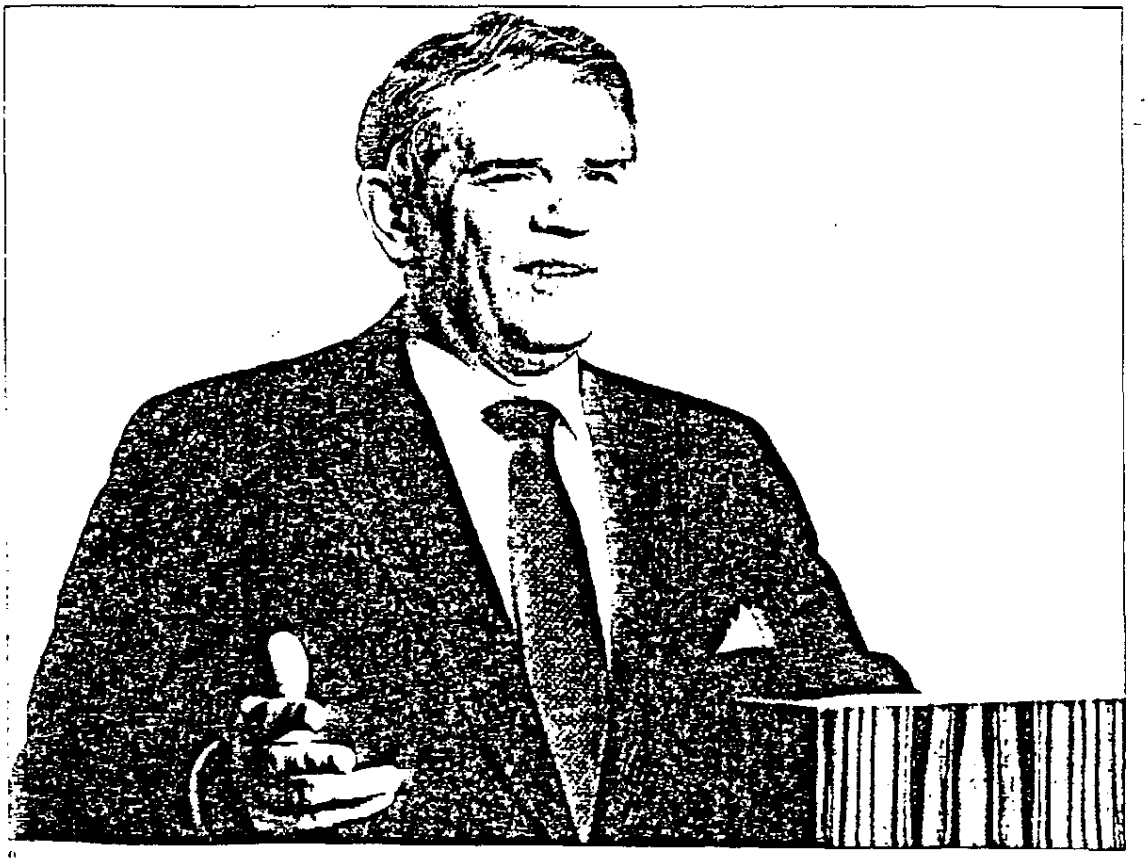
It is only through a sustained commitment that we will be able to keep the gains we have already made and continue to build on them. The mission of AIHC is as important today as it was when we first began our work, and I urge you to continue to lend your full support.

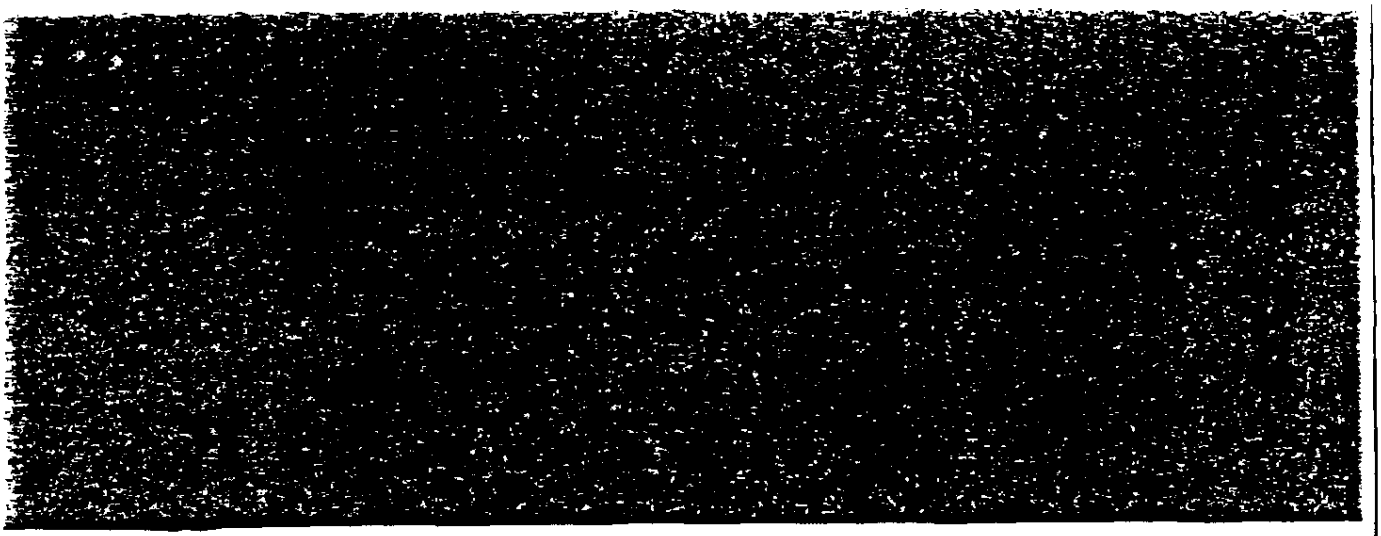
George L. Sella Jr.
AIHC Chairman
American Cyanamid Company

FROM THE VICE CHAIRMAN: LOOKING AHEAD TO 1984

"All of these (AIHC) activities will deal with some or all aspects of the cancer problem: how to identify the hazard, how to determine the risk, how to manage or regulate the risk."

Richard H. Lee





CONTINUITY IN SCOPE AND OBJECTIVES – Since its inception in 1977, the AIHC has been a leader in addressing chronic health effects issues – issues involving science in the regulatory process. As I see it, there are two parts to this concept: first, developing sound science and ensuring the quality of the science base; and second, the application of sound science to current and evolving laws and regulations. The first step, scientific evaluation, is a function of the toxicologists and other scientists, and is essential for the second step, where the regulator must base societal decisions on scientific data and evaluations. The thrust of AIHC's activity in promoting sound science has been in five directions: 1) support to the Administration in setting science policy, as for example, with the Office and Science and Technology Policy federal cancer policy currently under development; 2) support for legislation within Congress for statutory recognition of good science, such as bills recently introduced to establish a central science board to review science risk assessments; 3) recommendations to the regulatory agencies on means to implement good science in regulatory decision-making, such as science advisory panels and other means to distinguish between risk assessment and risk management; 4) support for strengthening the government's science data base, such as comments and recommendations on the National Toxicology Program review; and 5) development of systems to provide information to the public on chronic health effects issues.

These were the major areas of AIHC activity in the past year; these same areas will be the focus of AIHC activity in the coming year.

DEVELOPMENTS TO WATCH – Cancer is still the number one chronic health issue. The Office of Science and Technology Policy is expected to issue a cancer policy soon. OSHA will also be releasing a revised cancer policy. AIHC has recently convened a panel of experts to develop up-to-date scientific criteria for assessing evidence of carcinogenicity, building on 1977 National Cancer Advisory Board principles.

The NTP carcinogenesis bioassay program is currently under review. All of these activities will deal with some or all aspects of the cancer problem: how to identify the hazard; how to determine the risk; and how to manage, or regulate, the risk. AIHC will be following each of these closely and will promote uniformity in guiding principles: sound science in the risk assessment process; and separation of risk assessment and risk management.

...AIHC will continue to be responsive to change and will retain its ability to adjust its priorities and methods.

1984 ACTION PLAN – AIHC intends to spearhead efforts to ensure distinction between the risk assessment and risk management processes within the regulatory agencies. It is critical that we scrutinize our work to ensure that regulations are based upon the best available science and scientific judgement. In addition to peer review and a central panel of scientific experts, AIHC will support improved quality assurance and protocol review programs.

In the same direction, AIHC will be working to support the development of science advisory panels within the regulatory agencies. These panels should consist of appropriate outside scientific experts to advise the agencies on scientific evaluations and risk assessment. AIHC will seek to accomplish this by amendment of the statutes as they come up for re-authorization, or possibly through administrative mechanisms within the appropriate agencies. The concept has already been introduced to Congressional leaders and agency heads.

PUBLIC INFORMATION – Continuing programs will be developed for the news media and the public *on chronic health effects issues*. Credible independent scientists will speak out on scientific issues and AIHC views will be articulated and promoted by AIHC spokesmen. AIHC will sponsor a seminar for journalists on scientific principles and reporting on health issues. AIHC expects that sponsorship of future seminars will then be undertaken through educational institutions. Transfer of successful developed and operating programs to more appropriately funded and organized institutions will be considered for other AIHC programs.

EMERGING ISSUES – Several new areas of regulatory action may be proposed in the coming year. Legislative action on the issue of public compensation for chronic health effects from toxic waste dumps is being considered. This is a major concern for industry, and AIHC has already developed a scientific paper on causation for future use. Legislative proposals to amend present food safety laws have already been introduced and Congressional hearings may be held in 1984. AIHC will develop comments as appropriate again, supporting the concept of sound science as a basis for regulatory decision-making.

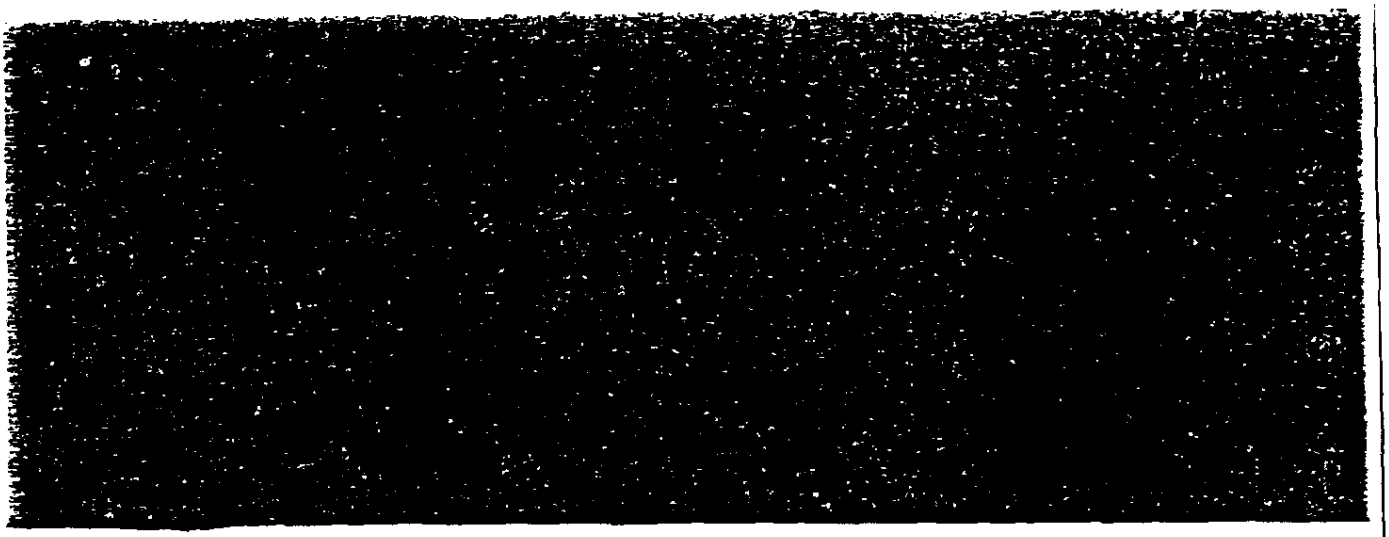
As we saw in 1983, new developments of concern to AIHC can surface with little warning. AIHC has developed into a cohesive organization capable of addressing emerging issues quickly and effectively. However, AIHC will continue to be responsive to change and will retain its ability to adjust its priorities and methods in a timely and appropriate manner.

Richard H. Leet
AIHC Vice Chairman
Standard Oil Company (Indiana)

SCIENCE POLICY TASK FORCE

"...the scientific community has progressed in understanding chemical carcinogenesis; in 1983 hope is high that we will see some resolution by the end of this decade."

Monte C Throdahl



From a scientific view point, AIHC member companies have not been effective in assuring their "publics" that their plants are safe places in which to work, or that their operations do not harm their workers or the environment, or that the public's apprehension over chemicals has decreased.

Much of the above represents the raison d'etre of AIHC, and these points are really driven by what could be called the force of the "mights"

For example:

> We don't know with absolute certainty that Chemical "X" won't cause cancer in man at "Y" ppb continuous exposure for "Z" years. So, we face continual downward revision of acceptable exposure because it "might" do so. And the levels become successively lower as analytical sensitivities for finding stray molecules keep improving.
>
> Until the industries making or using chemicals can convince the scientific community that we can reliably predict effects, we lack a strong defense for our actions.

Appearances and activist pronouncements notwithstanding, the scientific community has progressed in understanding chemical carcinogenesis. In 1983 hope might that we will see some resolution by the end of the decade. Specific emphasis of the Science Policy Task Force is to bring credibility to the concept of industrial support for good science in the change to risk hazards field, involving both academic and government.

THE ISSUES – For some time, the most important environmental science policy issues for chemicals have been to assess validity of concern and test the evidence for:

- alleged reproductive hazard
- toxicological testing of single substances in simple systems
- genetic testing

Select committees within AIHC have reported separately on these issues, their results are coordinated by the Science Policy Task Force and applied. Fundamental study of each of these issues will lead to better understanding of the underlying biological mechanisms and their relevance to regulatory decision-making.

Consistent with AIHC dedication to the policy of advocating and supporting sound science for regulatory purposes, the Science Policy Task Force has pursued goals that are limited to this viewpoint. We believe this policy and effort to be unique among trade associations.

...the cause-effect relationship between exposure and disease will predominate regardless of the subject.

During 1983, the following results were made to happen:

1. *Chronic Disease Committee* – AIHC presented numerous testimonies and organized considerable scientific support to emphasize scientific considerations in causality as a fundamental building block on which any regulatory decision should be made. The Science Policy Task Force formed a subcommittee to *enunciate the scientific principles underlying the cause/effect* relationship between exposure to a substance and disease. An institutional means to ensure a timely scientific review of the facts of what association "might" be expected between exposure and effect was developed. This process was provided to the industry effort to ensure a sound scientific basis for solutions to the public compensation issue.

2. *Science Panel Strategy* – AIHC created and implemented a strategy to support *Representative Marilyn Lloyd's Science Panel Legislation, which now* has strong bipartisan support as H.R. 4192. It was based on concepts in a National Academy of Sciences National Research Council report, *Risk Assessment in the Federal Government: Managing The Process*, the purpose of which is to ensure sound scientific bases for environmental regulation.

3. *NTP Testing Protocols* – AIHC developed a position paper on the design and execution of bioassays for the National Toxicology Program.

4. *NTP Bioassay Quality Assurance* – AIHC developed an industry-wide approach to working cooperatively with the National Toxicology Program on their emerging bioassay reviews. A Steering Committee under the direction of the Science Policy Task Force was organized to deal with the performance and audit matters of NTP contract laboratories. More importantly, AIHC has offered to participate in and provide the input to adoption of new quality assurance and audit procedures used by NTP.

5. *Cancer Policy and Principles* – AIHC developed positions on the proposed cancer policy of the Office of Science and Technology Policy. A new federal effort under the President's Office of Science and Technology Policy was charged with developing a coordinated government cancer policy. We provided industry scientific input and formed an independent panel of internationally renowned experts to recommend an approach to developing cancer principles.

FOR THE FUTURE – At this writing, the crucial two-part goal is to help gather total support from industry, academe, public interest groups and government agencies for generation of appropriate science to assist regulatory decision-making, and, at the same time, help keep the generation of scientific programs separated from regulatory decision-making within the same governmental organizations. In undertaking these tasks, the cause-effect relationship between exposure and disease will predominate regardless of the subject.

These goals and subordinate supporting programs will be reviewed as scientific research produces new information. The hope is that AIHC, through its committees and task forces, can achieve understanding from those within the Government who are responsible for knowing the crucial difference between science and lawmaking and the need to separate them.

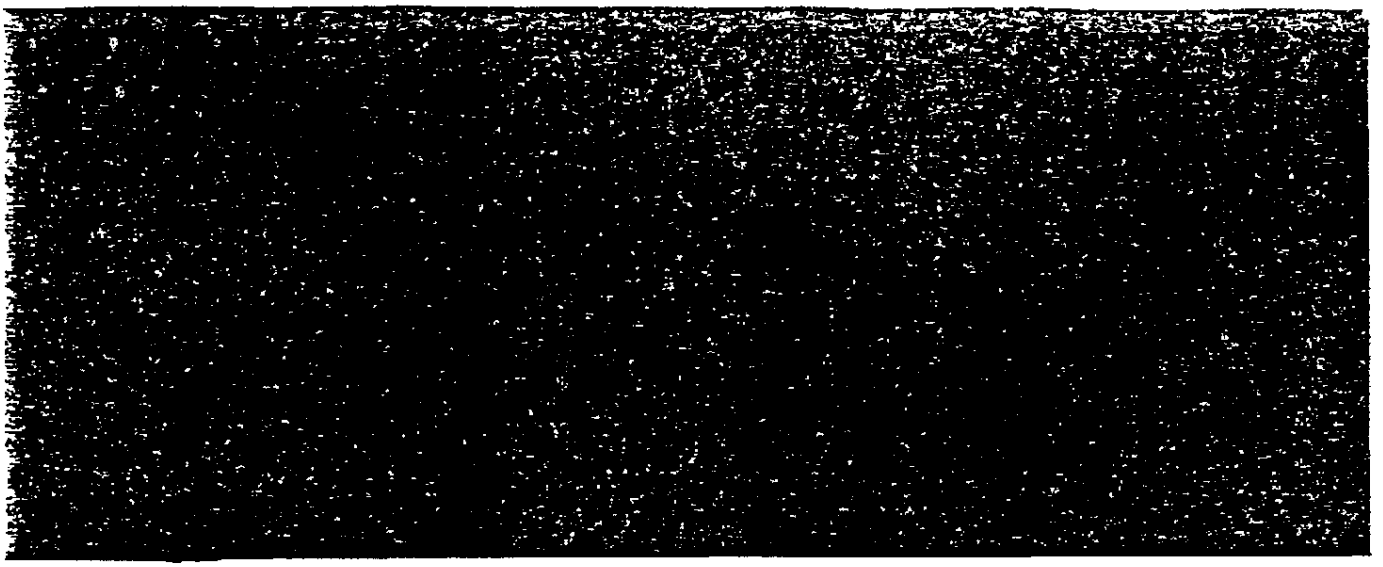
Monte C. Throdahl
Chairman, AIHC Science Policy Task Force
Monsanto Company

Jackson B. Browning
Vice Chairman, AIHC Science Policy Task Force
Union Carbide Corporation

OCCUPATIONAL SAFETY & HEALTH ADMINISTRATION TASK FORCE

"AIHC has played a key role in focusing attention on the principle that risk assessment based on sound science is separate from, and should precede, the regulation of potential carcinogenic hazards."

Donald C. Powell



AIHC was formed in 1977 to address the broad policy questions posed by OSHA efforts to develop a generic cancer policy. Accurately conceived, the policy would expedite the conversion of controversial and sometimes contradictory scientific data into regulations designed to protect employees. It is now almost six years since that regulation was proposed. The questions it raised have broadened to involve not only virtually every level of Government, but large segments of the academic and scientific communities as well. AIHC has played a key role in focusing attention on the principle that risk assessment based on sound science is separate from, and should precede, the regulation of potential carcinogenic hazards.

CANCER POLICY STATUS – The closing days of the Carter administration saw adoption of a cancer policy which AIHC believes is both scientifically and legally deficient. A thorough review of the issues involved led the Reagan administration to conclude that the policy needed amendment. Incorporating good science into a revised policy has proven difficult, and as of this writing, OSHA has not yet issued its cancer policy amendments.

TASK FORCE ACTIONS – In 1981, we had the opportunity to meet with OSHA officials on several occasions. We offered our expertise to ensure that the best available science is used as a basis for the new policy and made specific recommendations along those lines. At the same time, Government is attempting to develop broad principles which can help certain kind agencies determine if there is a hazard posed by exposure to a chemical, and to provide some measure of the degree of that hazard. AIHC has provided extensive comments to OSHA and other areas of Government on this matter, which will likely form the cornerstone upon which carcinogen policies of such agencies as OSHA are built.

AIHC also has been working with OSHA in an effort to strengthen the scientific capabilities of the Agency. One concept discussed is the establishment of an OSHA science board which would peer review scientific data and issues. OSHA has been receptive. The importance of ensuring that regulatory decisions are based upon the best available science has become increasingly clear and we have continued to support and encourage efforts by agency heads to strengthen the scientific bases of their policy making.

One concept discussed is the establishment of an OSHA science board which would peer review scientific data and issues.

We expect OSHA to issue its amended generic cancer policy relatively soon. We hope that this policy will encompass the specific recommendations made by AIHC.

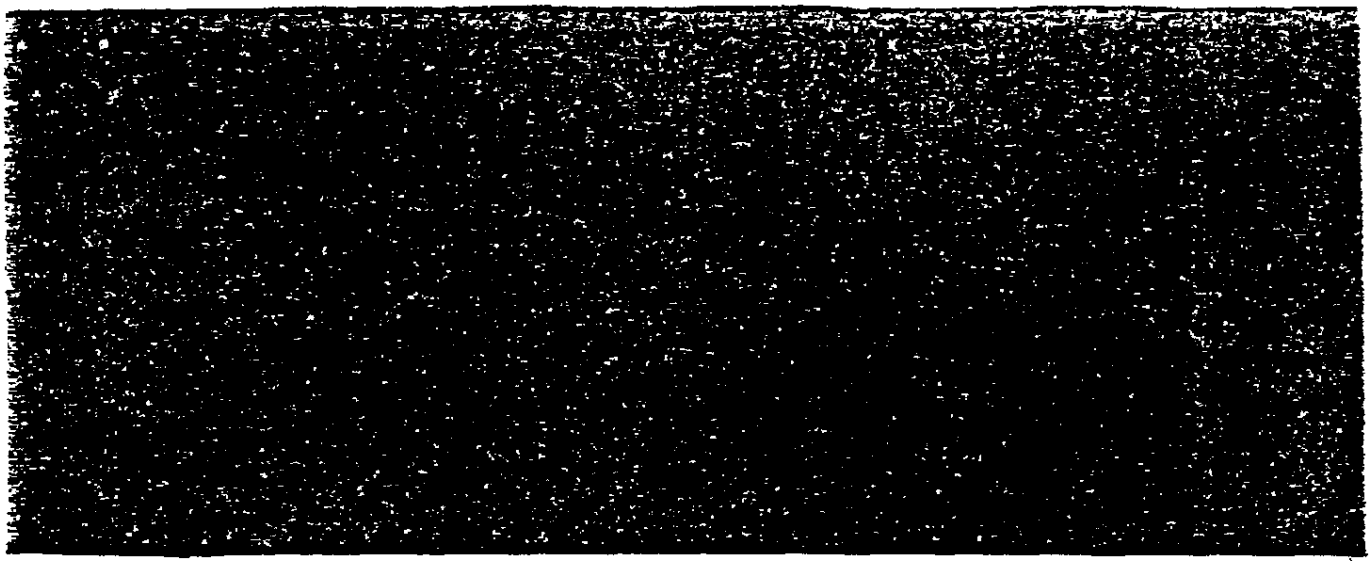
Donald C. Bowell
Chairman, AIHC OSHA Task Force
Chairman, International Corporation

ENVIRONMENTAL PROTECTION AGENCY TASK FORCE

"We have continued our dialogue on the implementaion of the Clean Air Act hazardous air pollutant section 112..."

Dan R. Hardee

DR. DAN HARLOW



Nineteen eighty-three has seen major changes at the Environmental Protection Agency. Early in the year, a political debate arose with Administrator Gorsuch and Assistant Administrator Lavelle at the center. The situation in the Agency deteriorated as the political controversy widened and deepened, ending with the departure of the entire senior management of the Agency in the spring. The Reagan Administration appointed a new management team headed by former EPA Administrator William Ruckelshaus, a decision which was met with widespread enthusiasm. The past few months have been a "shake-down period" for the new management.

Challenges are expected to arise again in the Clean Air Act as well as in other EPA-administered environmental laws....

GOALS PURSUED – AIHC has continued to pursue its goal of science-based regulation and legislation in health and environmental matters administered by EPA. We have continued our dialogue on the implementation of the Clean Air Act hazardous air pollutant section 112, and AIHC comments submitted to the Agency on May 17. We have met with a number of the new EPA management as they have come on board to continue delivery of our message of good science in Government decision-making. Administrator Ruckelshaus has made a major speech to the National Academy of Sciences on his thoughts about risk assessment in EPA decision-making, pointing out the importance of sound scientific base

SOUND SCIENCE AT EPA – Looking to the future, 1984 promises to be yet another year of political challenges to our goals. Especially in the area of chemicals, our Government often appears driven as much by misunderstanding and "gut reaction" fears as by well-considered science. Challenges are expected to arise again in the Clean Air Act as well as in other EPA-administered environmental laws now under consideration, such as the Clean Water Act and the Resource Conservation and Recovery Act. Particularly important will be the debates on new legislation for EPA in the public compensation area, which includes controversies over "toxic torts" and similar concepts. AIHC will be at the forefront of discussions on the proper scientific bases for these specific issues, as well as for the overall direction for the Environmental Protection Agency on chronic health effects policy.

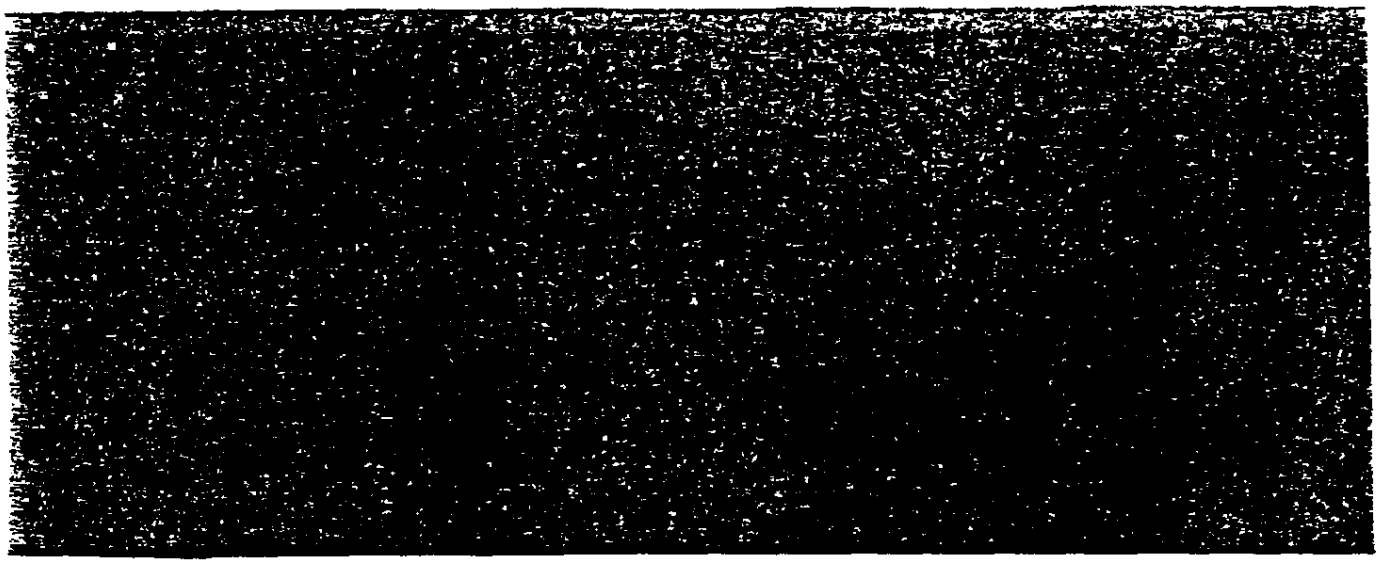
Dan Harlow
Chairman, AIHC EPA Task Force
Diamond Shamrock Corporation

Leonard L. Guarraia
Vice Chairman, AIHC EPA Task Force
Monsanto Company

FOOD & DRUG ADMINISTRATION TASK FORCE

"The pending bills amend the Delaney Clause to permit the use of food additives which only pose a 'negligible risk', authorize the use of risk assessment in determining whether a food additive is 'safe', define the term 'safe' to incorporate the concept of negligible risk, and create a science panel to advise FDA on scientific issues."

Lee A. Miller



Ongoing efforts in the Congress to amend the food safety laws raise many chronic health issues of vital interest to AIHC. The pending bills amend the Delaney Clause to permit the use of food additives which only pose a "negligible risk", authorize the use of risk assessment in determining whether a food additive is "safe", define the term "safe" to incorporate the concept of negligible risk, and create a science panel to advise FDA on scientific issues.

AIHC ACTIONS – The Task Force submitted a statement on these issues to the Committee on Labor and Human Resources chaired by Senator Hatch, the principal author of the legislation introduced in the Senate. It has also been coordinating with other groups in an effort to obtain Congressional action on food safety law reform.

The Task Force intends to continue monitoring the development of such legislation and to present testimony on issues of concern to AIHC.

1994 PLANS – With the introduction of a new Administration, bills in the House and Senate, food safety reform legislation is expected to be high on the agenda of the next session of the 103rd Congress, which reconvenes in 1994. The Task Force intends to continue monitoring the development of such legislation and to present testimony on issues of concern to AIHC. The Task Force will also maintain contact with other interested trade associations to help develop industry positions on the various issues raised by this legislation and to support efforts to improve the scientific basis for food safety rulemaking involving carcinogen issues.

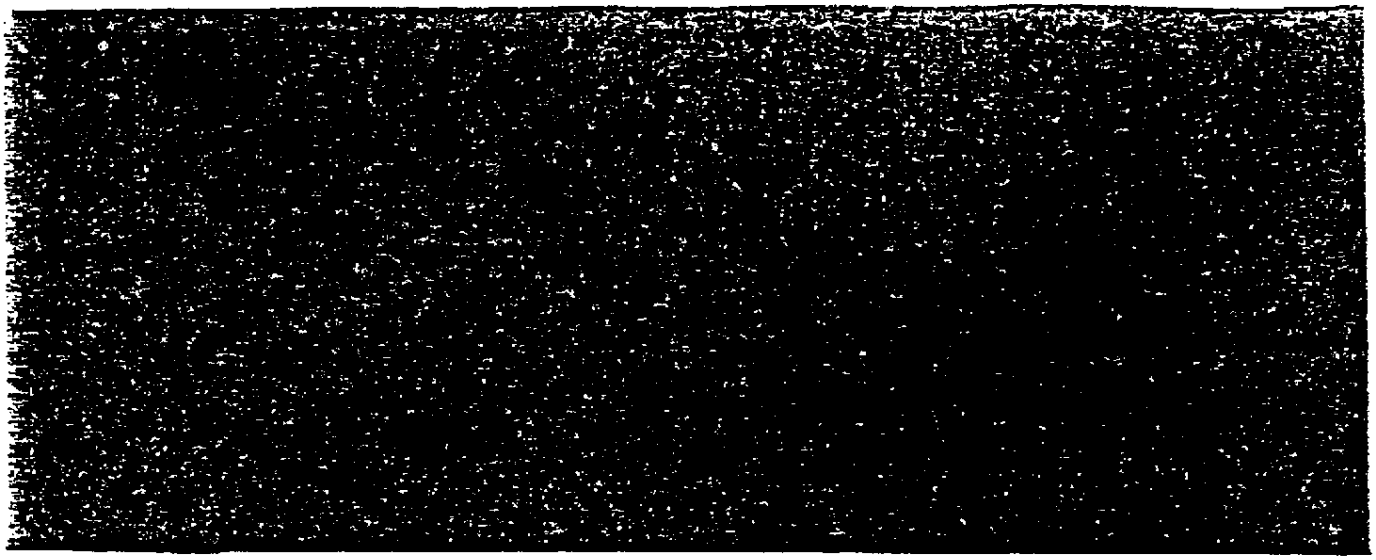
Lee A. Miller
Chairman, AIHC FDA Task Force
Monsanto Company

Gordon Kemp
Vice Chairman, AIHC FDA Task Force
Dow Chemical

CONSUMER PRODUCT SAFETY COMMISSION TASK FORCE

"(There is) an excellent opportunity for AIHC to encourage CPSC to increase its use of risk assessment and its proper scientific methodologies."

Ann M. Nomeg



The American Industrial Health Council (AIHC) is reactivating the Consumer Product Safety Commission (CPSC) Task Force in the fall of 1983. The Task Force will monitor and address the chronic health issues emerging in this independent Executive commission with a focus upon advocating a sound scientific basis for regulatory decisions.

CHALLENGES AND OPPORTUNITIES – CPSC is one of the regulatory agencies to consider costs imposed as well as risks avoided in protecting the public from "unreasonable risks" associated in this agency's case with consumer products. This provides an excellent opportunity for AIHC to encourage CPSC to increase its use of risk assessment and its proper scientific methodologies.

The 1981 amendment to the Consumer Product Advisory Act (CPS Act) requires the Commission to seek recommendations from the National Academy of Sciences as to scientific advisory panel members for the Chronic Health Advisory Panels (CHAP). In the coming months, the CPSC Task Force will follow the activities of the yet to be constituted di (2-ethylhexyl) phthalate in children's products CHAP and the formaldehyde in consumer products CHAP.

We will monitor to see that the projects receive scientific peer review.

In the Directorate of Health Sciences, the chronic hazards projects within the Chemical Hazards Program be in continual surveillance. We will monitor to see that the projects receive scientific peer review.

The CPSC Task Force will watch emerging issues in the CPSC process of establishing product hazard priorities for each fiscal year. Three of the eight top priority projects for FY 1984 deserve AIHC's careful attention. These include 1) chlorofluorocarbon solvents; 2) indoor air quality, particularly as related to the toxicological significance of volatile organic compounds found in residential air; and 3) identification and recalls of substantial product hazards under Section 15 of the CPS Act.

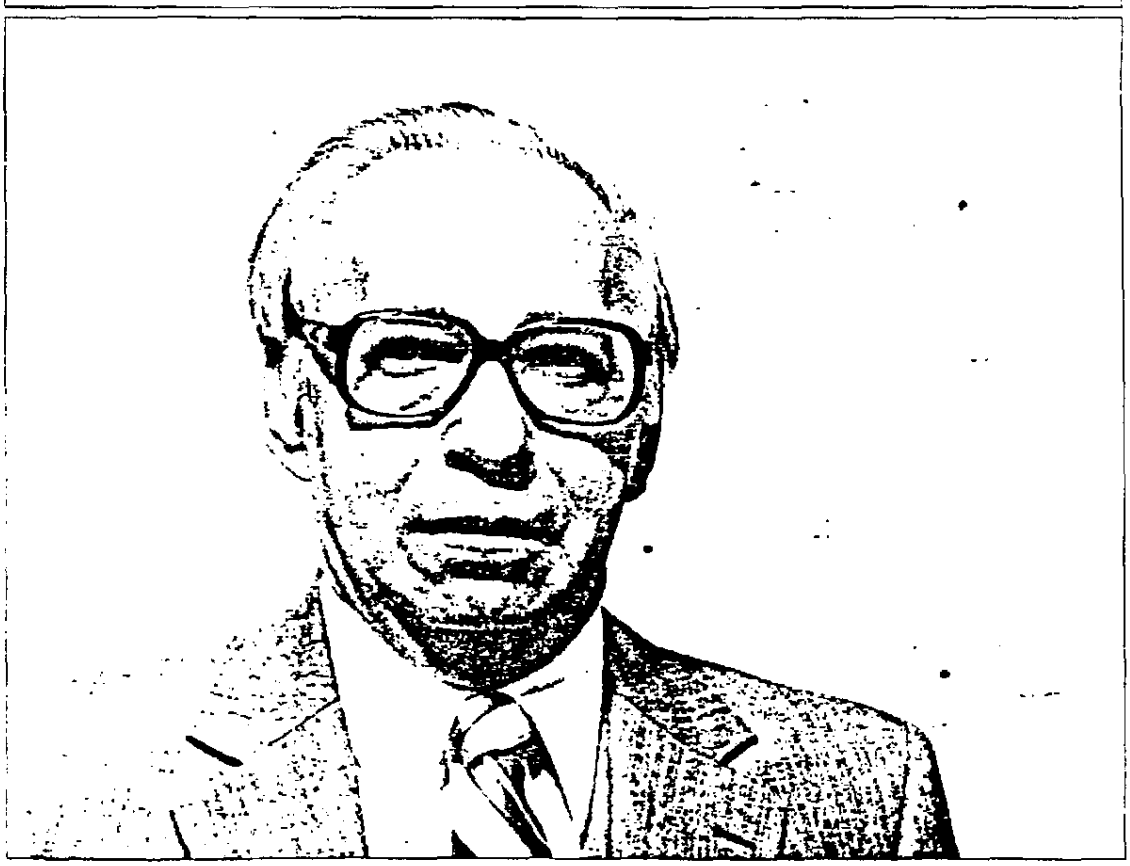
The Commission is a collegial body of three women and two men – none of whom have scientific backgrounds. This presents the CPSC Task Force with challenges and opportunities to reestablish direct, personal communication with the CPSC Commissioners. The CPSC Task Force can facilitate and promote the task of the CPSC scientific staff members by communicating the importance of a good science base to the individual and collegial regulatory directions and decisions of the Commissioners.

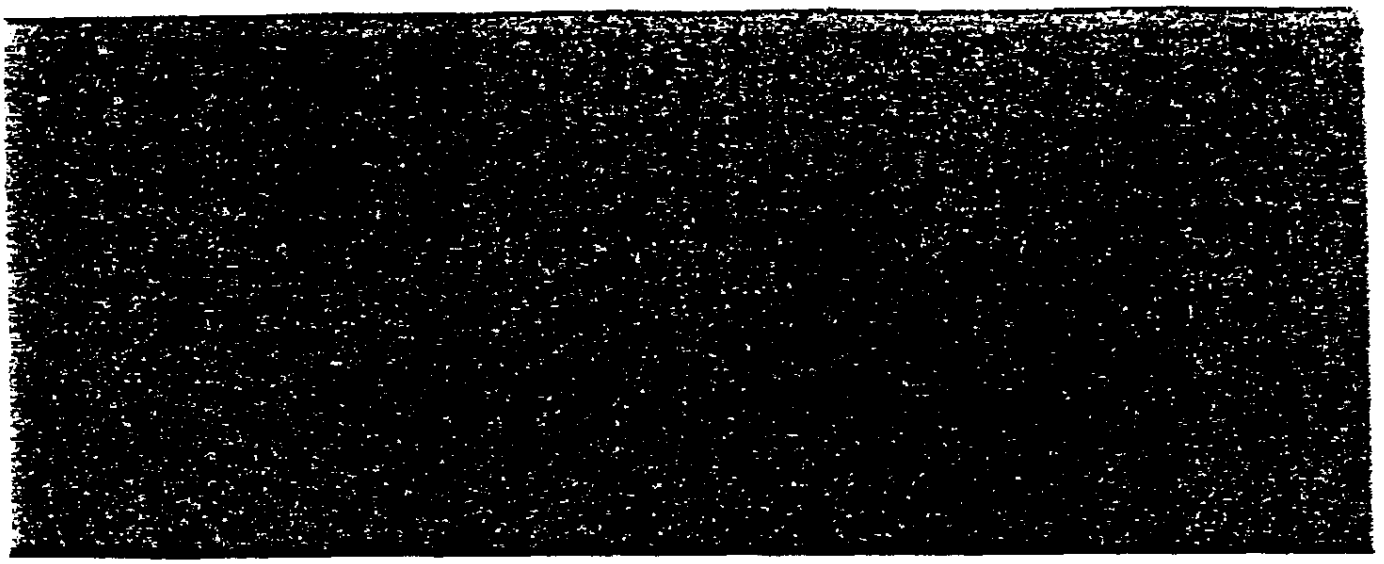
Ann M. Northrup
Chairman, AIHC CPSC Task Force
3M Company

STATE RESOURCE DEPLOYMENT TASK FORCE

"AIHC efforts have been acclaimed by state-level industry representatives as valuable contributions... and the goal of positive results with limited direct AIHC involvement has been met."

Fred Hoerger





Nineteen eighty three was a busy and productive first year for the State Resource Deployment Task Force. The Task Force was called upon to provide resources and assistance in three states: California, Louisiana and Maine. A mode of assistance applicable to these and other states was begun with the development of key source documents for use at the State level. Through these projects, the Task Force established itself as a valuable scientific resource for company representatives at the State level.

California – The Task Force was able to lend assistance on scientific matters to the Chemical Industry Council of California and the California Environmental Health Group in their deliberations with the State Air Resources Board on policies for control of sources of toxic air pollutants, the Department of Health Services proposed Carcinogen Policy, and legislation on toxic air contaminants. These policies are to establish criteria for the evaluation of health effects of substances emitted into the ambient air.

Louisiana – The Task Force supplied scientific background and assistance to the Louisiana Chemical Association in their development of a public relations program on chronic health issues. Ongoing consultation on current studies of issues in Louisiana is being provided.

Maine – Maine has proposed a unique policy for dealing with carcinogens. The Task Force has worked with the Allied Industries of Maine and the Forest Industry Information Office in answering these issues, and in identifying needed resources.

In the three states, AIHC has essentially helped organize a critical mass of local technical, legal and government relations expertise for industry. AIHC has also ensured that relevant scientific information was quickly assimilated and utilized by industry personnel. Finally, AIHC's experience with Federal chronic health issues was openly shared.

AIHC efforts have been acclaimed by state-level industry representatives as valuable contributions, and the goal of positive results with limited direct AIHC involvement has been met.

Chronic health issues at the state level will intensify during the next year.

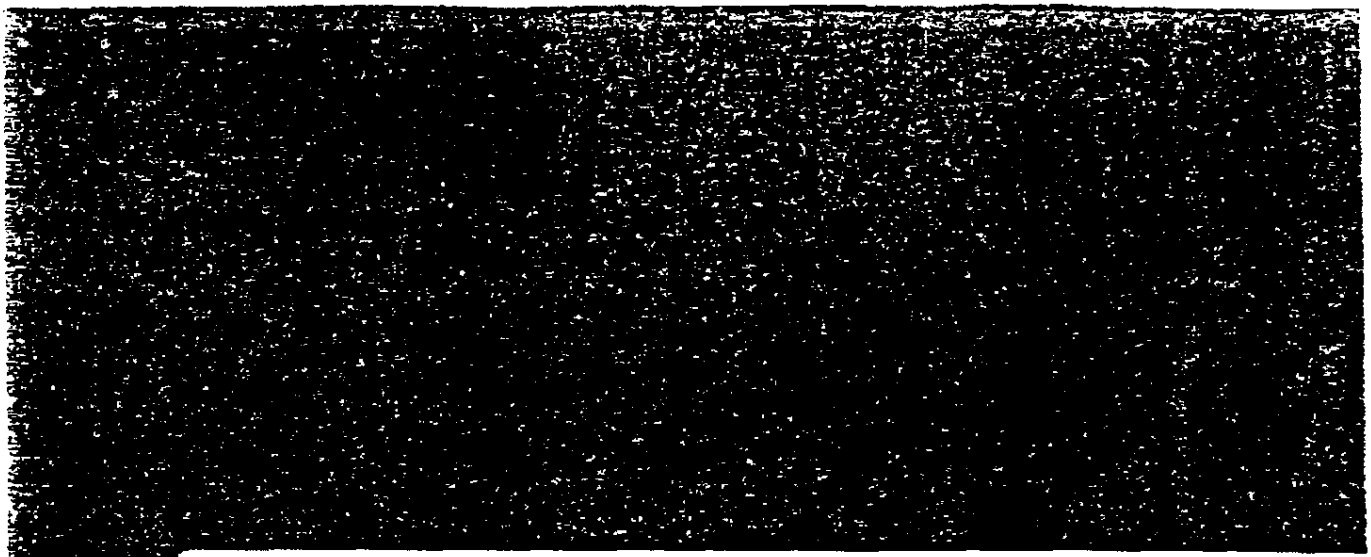
INFORMATION DEVELOPED AND SHARED – In addition to the provision of direct assistance at the State level, the Task Force began the development of source materials to enhance the understanding of chronic health issues by company and other officials at the local level. In August, the Task Force published the "Chronic Health Issues in the States" information kit to the membership and began distribution through the Chemical Manufacturers Association network of state associations. The kit is the first expandable resource of its kind to address chronic health issues from a lay person's perspective. It also highlights specific resources available from AIHC. The Task Force is developing two "Issue Briefs" on the use of lists in a regulatory and statutory context, and on policy statement considerations in identifying and assessing the risk of potential human carcinogens. Both of the issue briefs will be made part of the Chronic Health Issues in the States Kit and will be available separately.

By all standards, 1983 has been a stellar initial year for the State Resource Deployment Task Force. Along with the contributing efforts has come experience on effective ways of organizing and marshalling resources on the key recurring policy issues. Chronic health issues at the state level will intensify during the next year. Carcinogen and reproductive issues are the spotlight of policies and epidemiologic studies. These issues also cross-cut into right-to-know, toxic air contaminants, water quality, and a host of other issues. The Task Force is poised to actively continue to selectively help marshall AIHC member company resources, to develop issue analyses, and to make the AIHC Federal experiences available to state trade associations.

The Task Force urges member companies to identify and anticipate the state issues that will need effort in 1984 and beyond.

Fred Hauenstein
Chairman, AIHC State Resource Deployment Task Force
Dow Chemical, USA

August Landmesser
Vice Chairman, AIHC State Resource Deployment Task Force
Standard Oil Company



SCIENTIFIC COMMITTEE

"AIHC will continue to be a valued resource by sharing scientific expertise with Government, industry and the public..."

Robert J. Moolenaar

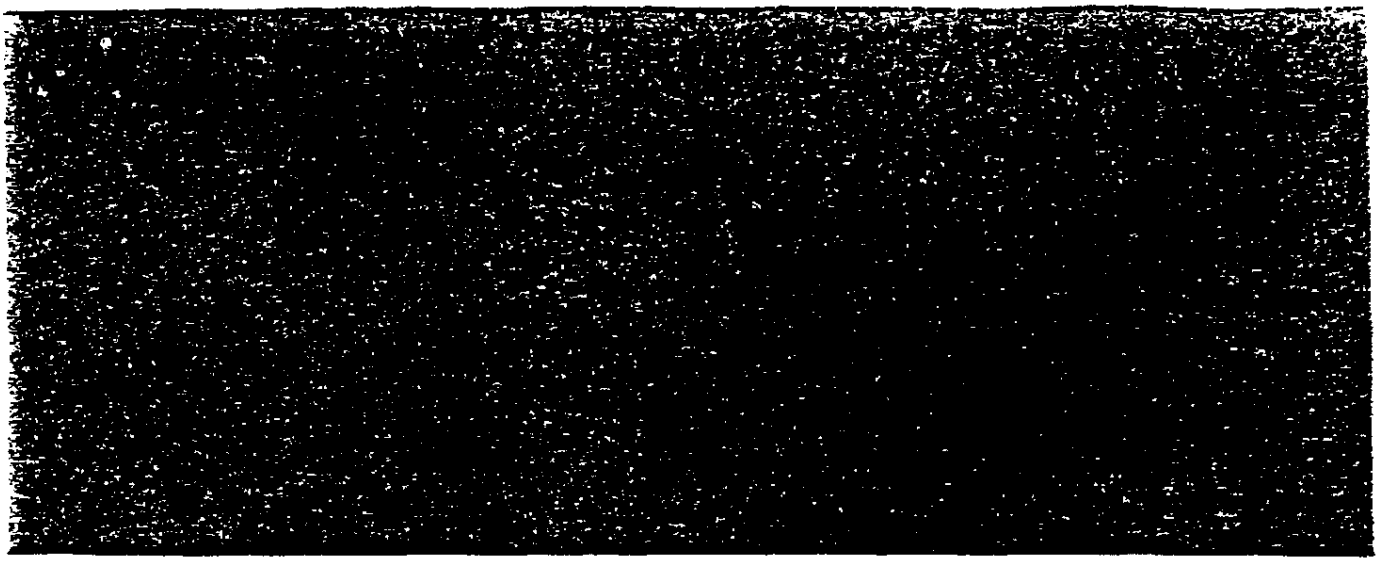
The Scientific Committee, in 1983, continued to concentrate on the scientific aspects of dealing with human health risks associated with long-term exposure to chemicals. The Committee draws upon the scientific resources of member companies and recognized academic, independent and Government scientists to develop positions on scientific issues important to the development of public policy. The Committee has contributed substantially to AIHC's status as a major science resource to Government agencies, to Congress, to the Administration, to states and to industry.

The Scientific Committee's four standing Subcommittees — Quantitative Risk Assessment, Epidemiology, Mutagenicity and Reproductive Effects — provide the bulk of the scientific expertise that enables AIHC to serve its many constituents as a scientific resource. In addition, a specially formed *ad hoc* subgroup explored the scientific assessment process involved in relating an observed adverse health effect in humans to specific consumer agents. The Subcommittee reports provide a detailed description of their accomplishments and activities.

The overview of key issues addressed by the Scientific Committee provided here include the purpose and design of bioassays carried out by the National Toxicology Program, the development of principles for assessment of carcinogenic agents, and selected issues emphasized in public presentations, written publications and critiques of various draft documents.

ASSISTANCE TO THE NATIONAL TOXICOLOGY PROGRAM (NTP)

BIOASSAY DESIGN — The Board of Counselors of NTP assembled an *ad hoc* Panel on Chemical Carcinogenesis Testing and Evaluation "to review the basic biology and chemistry of chemical carcinogenesis and recommend to the Board methods that the NTP should use for the detection and evaluation of chemical carcinogens." Four Panel Subgroups were designated to address components of the broad issue. The AIHC Scientific Committee provided extensive written and oral recommendations to the Subgroups to assist them in their task of providing future direction to the NTP. For one particularly important issue, the use of an age-matched control strategy for the test chemical during a bioassay, AIHC contracted with the Nutrition Foundation to assemble a group of experts to provide its specific critique and recommendations. A detailed report of the workshop organized by the Nutrition Foundation was filed with the NTP at his request. Further information on this is detailed in the AIHC Quantitative Risk Assessment Subcommittee report on page 27.



QUALITY ASSURANCE – The discovery of data discrepancies in two year bioassays at an NTP contractor laboratory has focused attention on quality assurance procedures in the execution of toxicological studies. The Scientific Committee, working with the Science Policy Task Force, has offered assistance to the NTP to develop procedures to foster consistent high quality in the conduct of such studies. The collective wisdom of industry, academic and government scientists is needed to institute programs to assure the scientific and regulatory communities, and the public, of the integrity of toxicological data.

In September, 1983, AIHC initiated a special project on bioassay quality assurance to facilitate and coordinate industry input to NTP; follow audits conducted by Government and industry; encourage good laboratory practices, and assist the news media. An NTP Steering Committee has been formed by AIHC to guide the Council's actions in this arena. It is chaired by Dr. Will Carpenter of Monsanto. Arlin Vorees of Union Carbide is heading AIHC's Quality Assurance Subcommittee, which will address the quality assurance aspects of the NTP audits. Dr. Earl Spurrier of the National Agricultural Chemicals Association is chairing a subgroup on media relations.

DEVELOPMENT OF CANCER PRINCIPLES

OSTP CANCER PRINCIPLES – The Scientific Committee provided extensive critique of the OSTP draft "Potential Human Carcinogenesis Methods for Identification and Characterization, Part I: Current Views." Part I consists of an overview of current scientific understanding of chemically induced carcinogenesis. Part II will give policy guidance for regulatory agencies based on Part I.

AN AIHC INITIATIVE TO DEVELOP PRINCIPLES OF CARCINOGEN ASSESSMENT – In response to several requests for concise, up-to-date principles for the assessment of chemical carcinogens, the scientific Committee has been referred to the 1977 National Cancer Advisory Board publication, "General Criteria for Assessing the Evidence for Carcinogenicity of Chemical Substances." Many of the principles contained in the 1977 document are still relevant, but recent developments require updating. To accomplish this, AIHC assembled a group of scientific experts in cancer research to update and expand the 1977 document. The results of their deliberations should provide a concise publication of current thinking in this area.

SCIENTIFIC RISK ASSESSMENT BY GOVERNMENT – The report of the National Academy of Sciences' Risk Assessment in the Federal Government: Managing the Process made clear the distinction between risk assessment, a scientific function, and risk management, deciding what to do about the risk.

The Scientific Committee integrated several developments in the scientific and legal arenas with recommendations from the NAS Report into a coherent document calling for a reevaluation of Agency risk assessment policies and procedures. The document was used as a basis for discussions with several agencies, recommending more extensive use of outside science panels for independent scientific review of agency risk assessments. There is great interest in this approach.

PUBLICATIONS, PRESENTATIONS AND CRITIQUES

Several publications and public presentations emanated from the Scientific Committee relating to the scientific and policy aspects of the assessment of carcinogens.

Critiques were provided to EPA on:

- Mutagenicity testing under FIFRA and TSCA.
- The EPA Gene Tox Program.
- Risk assessment methodologies for control of hazardous air pollutants.
- Risk assessment in an integrated approach to the regulation of toxic pollutants.
- Health assessment methodologies used to develop water quality criteria.

Several state approaches to the assessment of carcinogenic risk were reviewed in conjunction with the AIHC State Resource Deployment Task Force. Support was provided to CMA for product labeling requirements on chronic human health hazards. Testimony before the Congressional Subcommittee on Commerce, Transportation and Tourism supported legislation that would promote the use of scientific analyses in regulatory decisions and assure the adequacy of the science base for regulatory decisions.

Several publications and public presentations emanated from the Scientific Committee relating to the scientific and policy aspects of the assessment of carcinogens.

A paper was developed describing *Program Issues and a Scientific Foundation for Evaluating Injury from Hazardous Waste*. It outlines action steps initiated to generate information – information to provide a sound data base for scientific evaluation of human risk from exposure to waste sitings.

AIHC published its views on the role of cytogenetic monitoring in the workplace, concluding that techniques as studies hold promise for future application, but additional development is needed before routine use in the workplace is possible. Similar views were expressed in the Congressional Office of Technology Assessment report on cytogenetic monitoring in the workplace.

AIHC shared in the support of an international symposium: *Interpretation of Epidemiological Evidence* organized at Greene College, Oxford, with the further support and participation of the International Agency for Research on Cancer. The symposium focused on evidence suggesting lack of carcinogenicity (negative epidemiology), and was attended by noted epidemiologists from around the world.

A study, *Comparison of SMR, PMR and PCMR in a Cohort of Union Workers Potentially Exposed to Diesel Exhaust Emissions* was completed under the sponsorship of AIHC and American Petroleum Institute. The results of the study, submitted for publication, showed Proportionate Mortality Ratio (PMR) and Proportionate Cancer Mortality Ratio (PCMR) are useful for hypothesis generation, but they are not reliable measures of magnitude or risk.

A LOOK TO 1984

1984 will probably see publication of the OSTP Cancer Principles, the development of individual agency carcinogen assessment guidelines, and new guidelines for carcinogenicity studies at NTP.

Each of these will require analyses and comment by AIHC. Additional work will be required to clarify and explain the scientific procedures involved in relating observed health effects to potential causative agents. Assistance to state industry associations in the area of chronic health policies will continue. Agencies will reassess procedures for carcinogenicity assessment based on the OSTP report and in light of new scientific developments.

Legislative efforts to introduce more scientific review into agency risk assessment will also require attention.

The Committee will closely monitor new scientific developments relating to the mechanism of action of chemical carcinogens. Of particular importance are new developments in the field of oncogene research. New observances of mutated genes in tumor cells and the development of analytical techniques for their identification suggest this will be an expanding area of research during 1984. New insights into the mechanisms of tumor development could have a profound effect on the understanding of chemically-induced carcinogenesis and, in turn, on the assessment of risk from exposure to carcinogenic agents.

AIHC will continue to be a valued resource by sharing scientific expertise with Government, industry and the public as appropriate.

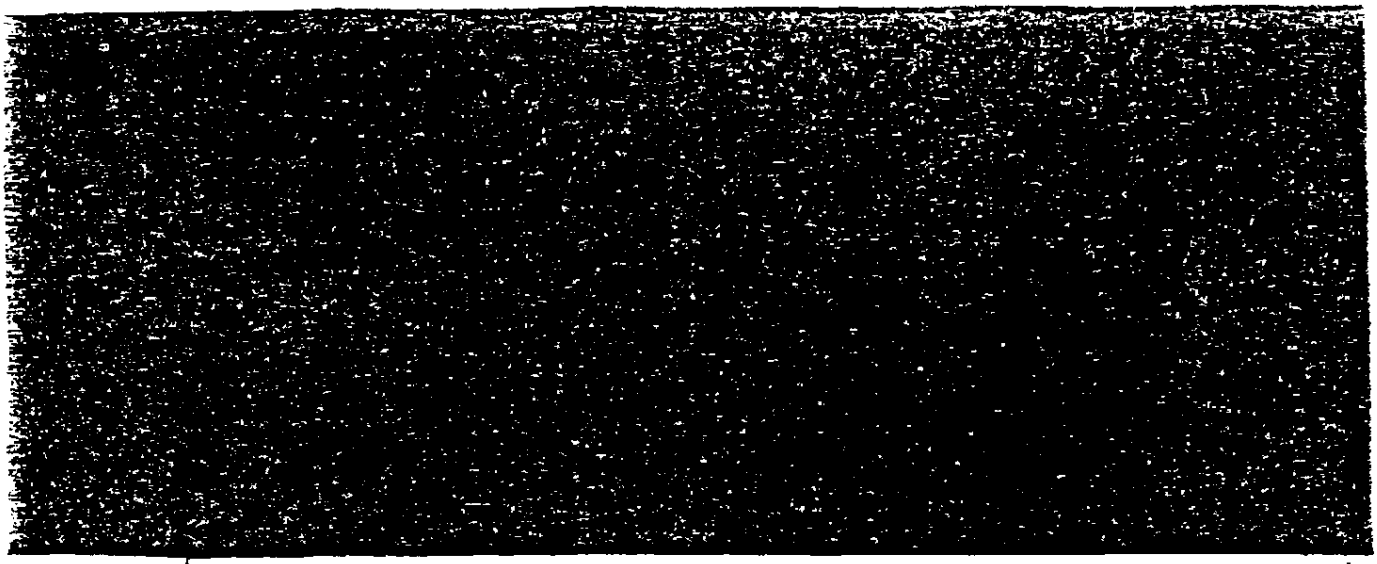
Robert J. Moolenaar
Chairman, AIHC Scientific Committee
The Dow Chemical Company

Arlin G. Vorees
Vice Chairman, AIHC Scientific Committee
Union Carbide Corporation

EPIDEMIOLOGY SUBCOMMITTEE

"The Epidemiology Subcommittee's activities... have been directed to developing understanding and acceptance of epidemiology's legitimate role in health risk estimation."

Carl W. Limland



Epidemiology continues to be an important consideration for linking laboratory signals of chronic disease potential to human experience. The Epidemiology Subcommittee's activities since the last annual report have been directed to developing understanding and acceptance of epidemiology's legitimate role in health risk estimation. Contributions presenting this position were made to AIHC Scientific Committee critiques and comments for the development of cancer principles both in and out of government.

INTERACTION WITH INDUSTRY, GOVERNMENT AND ACADEMIA — Common interests have been developed with the American Petroleum Institute, the Electric Power Research Institute, the Gas Research Institute, and the Chemical Manufacturers Association to promote the sound use of epidemiology. Participation with government entities such as EPA, the Centers for Disease Control, the National Center for Health Statistics, and the Association of State and Territorial Health Officials has been included.

Epidemiology continues to be an important consideration for linking laboratory signals of chronic disease potential to human experience.

More specifically, the Subcommittee advised CMA on the implementation of the concept of the independent study by CAREP (Consortium Associated for Research and Education in Pathology) to assess the potential health hazards of waste disposal sites. It also encouraged CMA's genetic studies, which have the potential to demonstrate a carcinogenic threshold in humans. It assisted with API to sponsor a comparison study of Proportional Mortality Ratio (PMR) and Standardized Mortality Ratio (SMR) methodologies which demonstrated the unreliability of the former. A position paper has been submitted for publication.

It supported the international symposium convened by Sir Richard Doll on the "Interpretation of Epidemiological Evidence," which attempted to weight negative and ambivalent data. Finally, it has developed a broad base of sponsorship for a government/academia/industry symposium on epidemiology issues of importance to health risk estimation, to be held in early 1984.

FOR 1984 — For the coming year, the Subcommittee will, of course, be finalizing arrangements with its co-sponsors for the upcoming symposium mentioned. On a smaller scale, it is exploring with API the possibility of a PMR/SMR workshop. Together with the AIHC Mutagenicity and Reproductive Effects Subcommittees, it will attempts to deal with the problem of how to assess the meaning for humans of chemical responses observed in non-human testing systems; this will involve identification of potentially relevant data sources for statistics on human populations as baseline information.

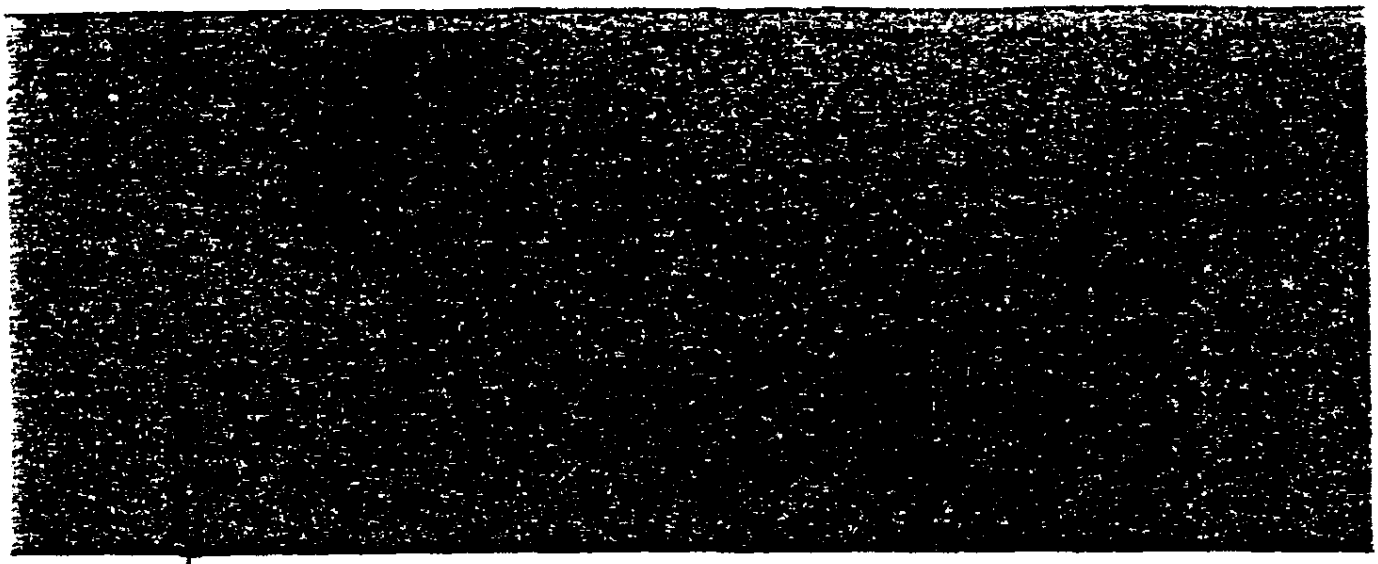
The issues remain challenging and epidemiological perspective will be essential.

Carl W. Cotland
Chairman, AIHC Epidemiology Subcommittee
Exxon Chemical Americas

MUTAGENICITY SUBCOMMITTEE

"One of the major issues which will be addressed by the Mutagenicity Subcommittee in the future will be the role of mutagenicity testing in human risk assessment, especially assessment of potential human mutagenicity."

Larry Kier



In 1983, the AIHC Mutagenicity Subcommittee continued its efforts to insure that sound scientific principles and accurate consideration of available scientific data will be utilized in the application and interpretation of mutagenicity testing. The field of mutagenicity testing, or genetic toxicology, continues to be in a state of flux with respect to development and validation of tests and, most importantly, to interpretation of the relevance of results of such tests to humans. The Mutagenicity Subcommittee, because of the excellent scientific talent and credentials of its current fifteen members, has been able to present credible positions on several mutagenicity testing issues.

Subcommittee members are in the process of preparing critical reviews of reports on key assay systems.....

1983 ISSUES – One preeminent issue in 1983 was the potential use of genetic testing in the occupational environment. The Mutagenicity Subcommittee prepared an AIHC position paper on "The Use of Cytogenetic Monitoring in the Workplace". This position paper was distributed to AIHC member companies and organizations and was presented at the Fifth Annual Rocky Mountain Center for Occupational and Environmental Health Conference and the Toxicology Forum. A second general issue was the continued promulgation of new mutagenicity test systems and predetermined *decisions regarding interpretation of test results*. The Mutagenicity Subcommittee has consistently argued for flexibility and the exercise of good scientific judgement. In 1983, comments reflecting these positions were prepared in response to FIFRA mutagenicity test guidelines (Subparts I and J) and to generic features of mutagenicity test schemes formulated by the U.S. E.P.A. for use in TSCA Section IV test rules.

The Mutagenicity Subcommittee has also been concerned with current large scale efforts to evaluate and validate mutagenicity assay systems. The National Toxicology Program has continued an extensive experimental plan to determine potential uses of short term tests for the study of carcinogenicity. The Mutagenicity Subcommittee submitted comments to the National Toxicology Program Ad Hoc Panel Subgroup which is reviewing the NTP short term testing program. These comments identify key issues which should be addressed by the NTP to obtain maximum scientific benefit from the program resources. The U.S. E.P.A. Gene-Tox program has issued a series of reports on individual assay systems, including recommendations on the conduct and potential utilization of the assay systems. Subcommittee members are in the process of preparing critical reviews of reports on key assay systems and the first of these reviews has been accepted for publication in *Regulatory Toxicology and Pharmacology*.

FUTURE ISSUES – One of the major issues which will be addressed by the Mutagenicity Subcommittee in the future will be the role of mutagenicity testing in human risk assessment, especially assessment of potential human mutagenicity. A thorough analysis of the present status of mutagenicity testing and its application to risk assessment will provide perspective on the proper and scientifically justifiable relevance of mutagenicity testing. The analysis will consider possible implications of recent work in the areas of mammalian mutagenesis and oncogenes.

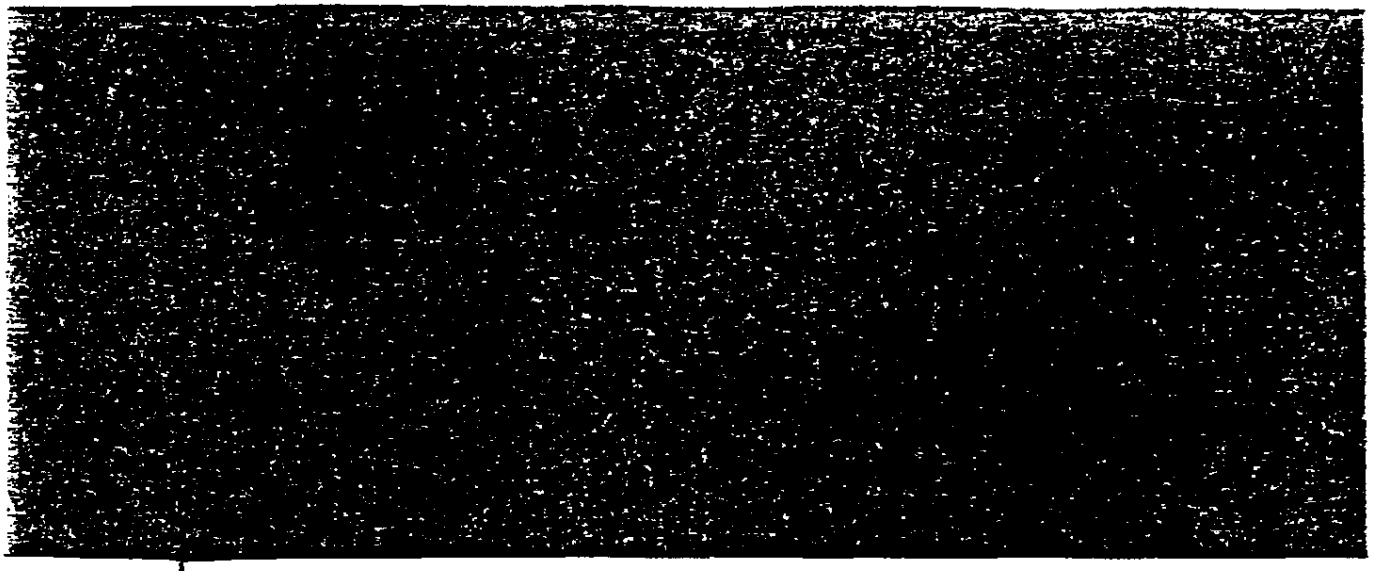
The current capability of the Mutagenicity Subcommittee to provide timely and cogent comments is due in large part to the dedicated efforts of the original chairman of the Subcommittee, Dr. Joseph Ivy, who resigned as chairman in 1983. He provided a solid foundation for the continued effective performance of the Mutagenicity Subcommittee.

Larry Kier
Chairman, AIHC Mutagenicity Subcommittee
Monsanto Company

QUANTITATIVE RISK ASSESSMENT SUBCOMMITTEE

"In 1983 the Subcommittee was assigned lead responsibility within AIHC to prepare and present detailed position papers for the federal government's Ad Hoc Panel on Chemical Carcinogenesis."

Donald Hughes



In 1983 the Subcommittee was assigned lead responsibility within AIHC to prepare and present detailed position papers for the federal government's "Ad Hoc Panel on Chemical Carcinogenesis." The panel was established by Dr. Daniel Rall's Board of Scientific Governors in May 1983. It's main purpose is to broadly review the National Toxicology Program's bioassay testing system. An October 1st deadline was set for providing input to four individual subpanels dealing with:

1. Prechronic studies,
2. Chronic studies;
3. Short-term and other tests to supplement or foreshorten bioassay testing; and
4. The regulatory impact of bioassay data.

SUBCOMMITTEE INITIATIVES – AIHC participated in three of the four panel meetings and provided written input to the fourth. In addition, we commissioned The Nutrition Foundation to review and make recommendations on the use of oil gavage, which is a dosing regimen used in over 40% of the present NTP bioassay studies. These papers have been assembled into one document that constitutes the AIHC position and recommendations on the design, conduct, and interpretation of the NTP bioassay program for carcinogenicity.

EXTERNAL INPUT – The Subcommittee's formal 1983 project, "Interspecies Relationships in Carcinogenesis" was shelved, while our efforts were concentrated on the review of the NTP Bioassay Program. However, we were able to establish some useful groundwork during the year. In March, we met with the Chemical Industry Institute of Toxicology staff members working in areas basic to interspecies extrapolation. In October, Dr. Richard Adamson, Director of the Division of Cancer Cause and Prevention at the National Cancer Institute, addressed a joint meeting of the AIHC Scientific Committee and its Risk Assessment Subcommittee on "The Use of Primates for Chemical Carcinogenesis Research." In November, Dr. Edward Calabrese of the University of Massachusetts and Dr. Harold Hasenbaum of the University of Connecticut participated in a concentrated one day meeting on "The Principles of Animal-to-Man Extrapolation." Our aim is to look toward holding a workshop next year addressing the state-of-the-art of "Species-to-Species Extrapolation in Carcinogenesis."

AIHC participated in three of the four (NTP) panel meetings and provided written input to the fourth.

SUBCOMMITTEE OUTPUT – The Subcommittee presented talks on risk assessment during the year to the Chemical Manufacturers Association Chemical Regulations Advisory Committee; the National Conference of State Legislators; and, the National Governors Association. Input to the staff of the latter group was timely as they recently developed their first position paper on risk assessment. It was released at the October National Governors Association meeting and AIHC's scientific contributions were publicly acknowledged.

The Subcommittee also participated in the annual meeting of the Association of State and Territorial Health Officials with a talk entitled "Risk Assessment and Public Policy." These remarks were based on AIHC's input to the National Academy of Sciences committee that reviewed risk assessment procedures in the federal government.

In addition, the Subcommittee participated in a workshop on Risk Assessment Methods sponsored by the EPA's Water Quality Criteria Laboratory in Cincinnati.

PUBLICATIONS – During the year three of our papers entered the publication stage. These include:

1. D.H. Hughes, R.O. Bruce, R.W. Hart, L. Feldborn, D.W. Gaylor, J.M. Smith, W.W. Carlton. "A Report on the Workshop on Biological and Statistical Implications of the EDO Study and Related Data Bases." Fundamental and Applied Toxicology. 3:129-136. May/June 1983.
2. R.O. Bruce, W.W. Carlton, D. Clayson, K.H. Farber, D.H. Hughes, J.F. Quast, D.S. Salsburg, J.M. Smith, W.R. Brown, M.E. Crammer, R.L. Sielken, J. Van Ryzin, R.C. Barnard. "The SOT Task Forces Response to the NCTR Letter." Fundamental and Applied Toxicology. 3:9a-12a. July/August 1983.
3. C.N. Park, R.D. Snee. "Quantitative Risk Assessment: State-of-the-Art for Carcinogenesis." Fundamental and Applied Toxicology. 3:322-331. July/August 1983.

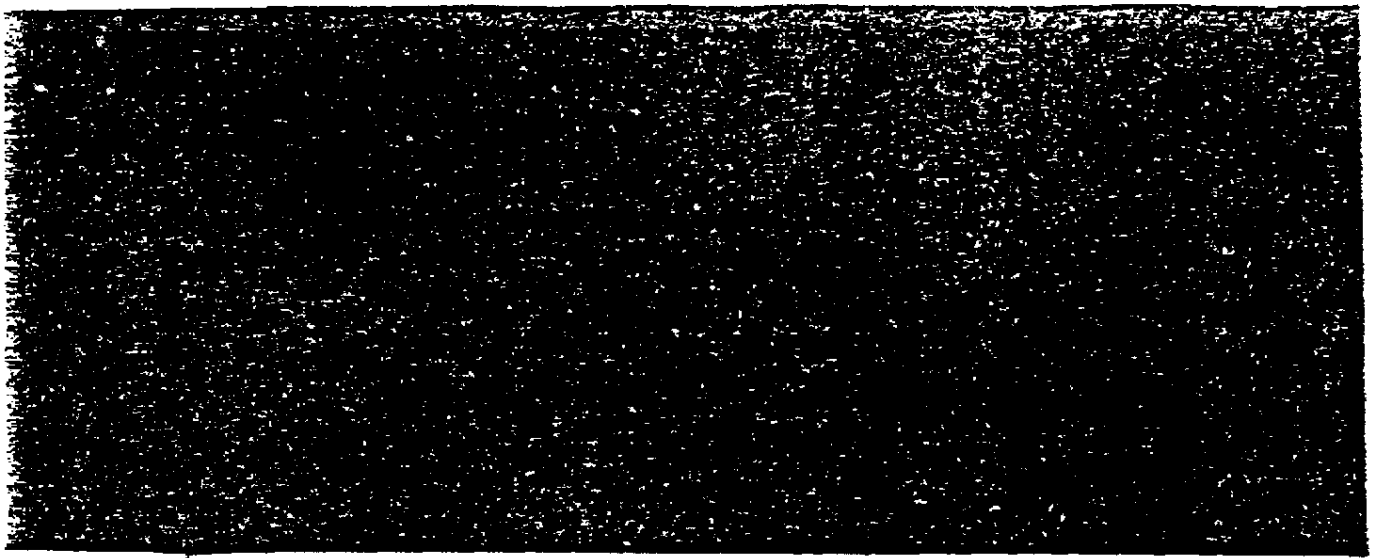
Reprints of all three papers are available from AIHC's New York and Washington offices.

Donald Hughes
Chairman, AIHC Quantitative Risk Assessment Subcommittee
The Procter & Gamble Company

REPRODUCTIVE EFFECTS SUBCOMMITTEE

"The Subcommittee intends to explore better approaches to the risk evaluation of data from reproductive toxicity studies."

David Ferguson



After a hiatus of some two years, the Subcommittee on Reproductive Effects was re-established early this year. While its membership has changed from that of the original Subcommittee, its role remains the same – to provide advice and guidance to AIHC member companies on issues relating to adverse effects of chemicals on the reproductive system.

IDENTIFYING ISSUES – A survey of a sample of member companies showed that the spectrum of interest in reproductive issues is very broad. Interests range from the highly technical, e.g., the investigative techniques useful in evaluating potential effects on the reproductive system, to the highly practical, e.g. the management of reproductive risk in the workplace. They include legal and regulatory issues and also information needs.

A survey of a sample of member companies showed that the spectrum of interest in reproductive issues is very broad.

ADDRESSING THE ISSUES – In seeking to address some of these issues, the Subcommittee has established contact with key personnel in the National Toxicology Program. These contacts will ensure that the Subcommittee is well informed on government-funded research into chemicals-induced reproductive effects. The Subcommittee is also beginning to develop contacts with academic researchers in this field and has engaged in discussions with trade associations, in particular the Chemical Manufacturers Association, to ensure that in areas of mutual interest, there is effective utilization of scarce industrial resources.

DEFINITIONS AND RISK EVALUATION – Two areas that the Subcommittee is currently addressing include definitions and risk evaluation. The Subcommittee recognizes the problems that can arise from the use of inconsistent, loosely defined terminology in discussing effects on the reproductive system. It will be seeking to foster the use of scientifically sound definitions and their acceptance by, inter alia, regulatory agencies. Another area is the practical significance of human exposure to chemicals capable of adverse effects on the reproductive system. Much of the current work on risk assessment has been devoted solely to extrapolation to man of data from carcinogenicity studies. The Subcommittee intends to explore better approaches to the risk evaluation of data from reproductive toxicity studies.

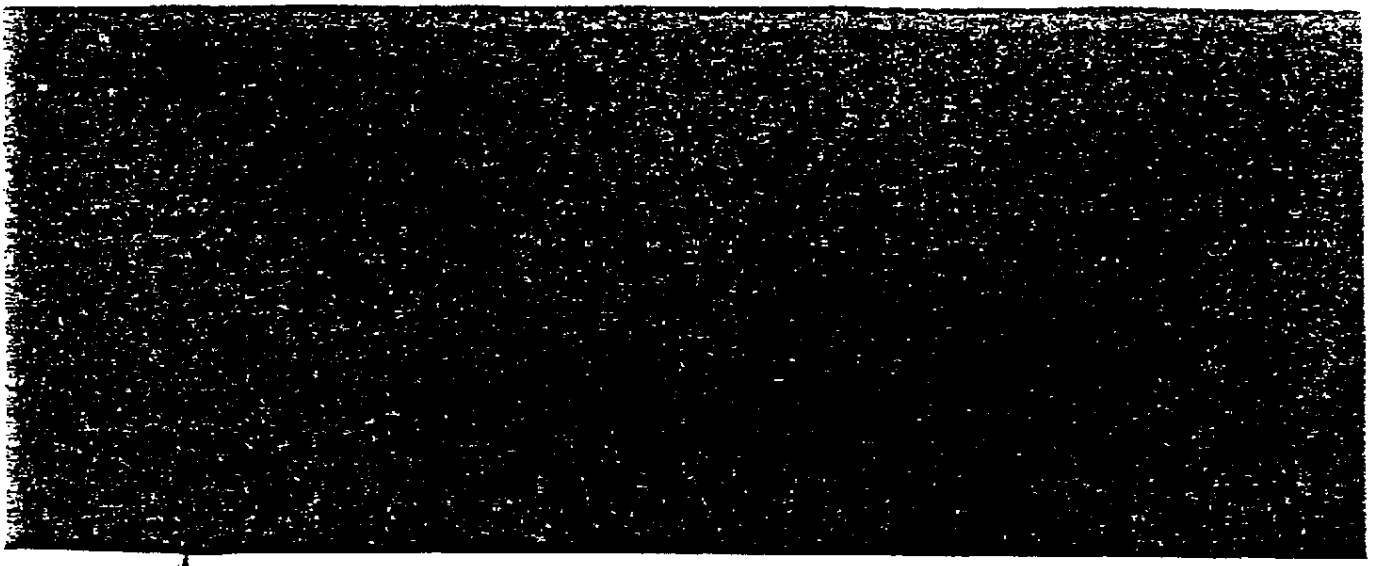
NINETEEN EIGHTY FOUR – In the coming year, the Subcommittee will continue to sharpen its focus on key scientific issues related to reproductive effects. As part of its program, it will invite prominent guest scientists to help keep AIHC up-to-date on issues of current importance.

David Jefferson
Chairman, AIHC Reproductive Effects Subcommittee
ICI Americas Inc.

PUBLIC AFFAIRS COMMITTEE

"The Public Affairs Committee was pleased to share in the joint effort between industry and a representative of an environmental study group to develop proposals for improving the quality and credibility of the science upon which agency decisions are based."

Edwin L. Behrens



The public Affairs Committee's primary responsibility is to provide guidance and political insight to the Board, Executive Committee, and other Committees and Task Forces of AIHC. The Committee also helps in the development and execution of AIHC programs involving the Executive Offices of the President, Agency Administrators, and the Congress.

Over the past year, the Public Affairs Committee has focused on three primary interest.

DIALOGUE ON POLICY – First, the Committee has been committed to the pursuit of dialogue with federal policy makers and national thought leaders. The Public Affairs Committee's objective has been to stimulate an awareness for the need for sound science as a predicate for regulatory actions, particularly where health and the environment are concerned. As an example, in February, AIHC jointly sponsored a workshop with the Brookings Institution on "Public Policy, Science, and Environmental Risk," which included a number of distinguished participants. A limited number of staff from key offices within the Administration and the Congress were also invited to attend.

The product of this workshop, a series of individual papers by the participants, is to be published shortly as part of the well-recognized series, "Brookings Dialogues on Public Policy." Copies of the publication will be made available to AIHC.

RISK ASSESSMENT COORDINATION, CONSISTENCY – A second area of interest is in support of Administration efforts by government to improve interagency coordination of cancer policies and to seek a more comprehensive approach to the assessment of risk by the respective agencies.

Over the past year, AIHC has continued to encourage and support such an effort by the Office of Science and Technology Policy and the various agencies and departments of government that are involved. The OSTP organized an interagency Scientific Work Group that prepared and circulated for comment a draft document entitled, "Potential Human Carcinogens: Methods for Identification and Characterization." This draft covered the scientific state-of-the-art and will be Part I of a final document. AIHC filed comments on the draft, and the Public Affairs Committee later coordinated AIHC testimony before a Subcommittee of the House Committee on Energy and Commerce, in support of the OSTP approach.

...a common foundation for each of the federal agencies in the development of their respective cancer policies.

The Public Affairs Committee has continued to coordinate AIHC's interest in this important effort by OSTP, and we look forward to the issuance of a second draft of Part I and a draft of Part II, the so-called "Principles" document, later this fall. The *Principles* document is intended to provide a common foundation for each of the federal agencies in the development of their respective cancer policies.

Upon publication of the completed OSTP document in the *Federal Register*, the Public Affairs Committee will work with AIHC Government and other entities and individuals to ensure that the results of the coordination effort are considered and implemented as may be appropriate in the months ahead.

AGENCY SCIENCE PANELS PEER REVIEW – A third area of interest has been the National Academy of Sciences report on *Risk Assessment in the Federal Government: Managing the Process*, which was issued on March 1, 1983. This excellent report contained two sets of recommendations, both of interest to AIHC. The first, recommending increased use of independent scientific peer review by the respective agencies, led to AIHC-initiated proposals for establishing independent Science Advisory Panels within EPA. Subsequently, the Committee arranged a meeting with Mr. Ruckelshaus, Administrator of EPA, for AIHC's Science Policy Task Force to present these proposals for his consideration. The proposals are now awaiting Mr. Ruckelshaus's decision, pending staff review.

Importantly, these proposals were developed and offered jointly by the AIHC and Mr. Terry Davies of the Conservation Foundation. The Public Affairs Committee was pleased to share in the joint effort between industry and a representative of an environmental study group to develop proposals for improving the quality and credibility of the science upon which agency decisions are based.

CENTRAL SCIENCE PANEL – The second part of the NAS recommendations was related to the establishment of a "Central Board of Risk Assessment" to be located within the NAS. The Public Affairs Committee is pleased to have helped in gaining the broad bi-partisan support enjoyed by legislation introduced by Congressman James Martin (R-NC), which is based substantially on the NAS Report. Co-sponsors with Mr. Martin on this effort include House Science and Technology Committee Chairman Fuqua (D-FL), Subcommittee Chairmen Gore (D-TN) and Walgren (D-PA), ranking minority members Winn (R-KS) and Gregg (R-NH), and House Energy and Commerce Committee member Don Ritter (R-PA).

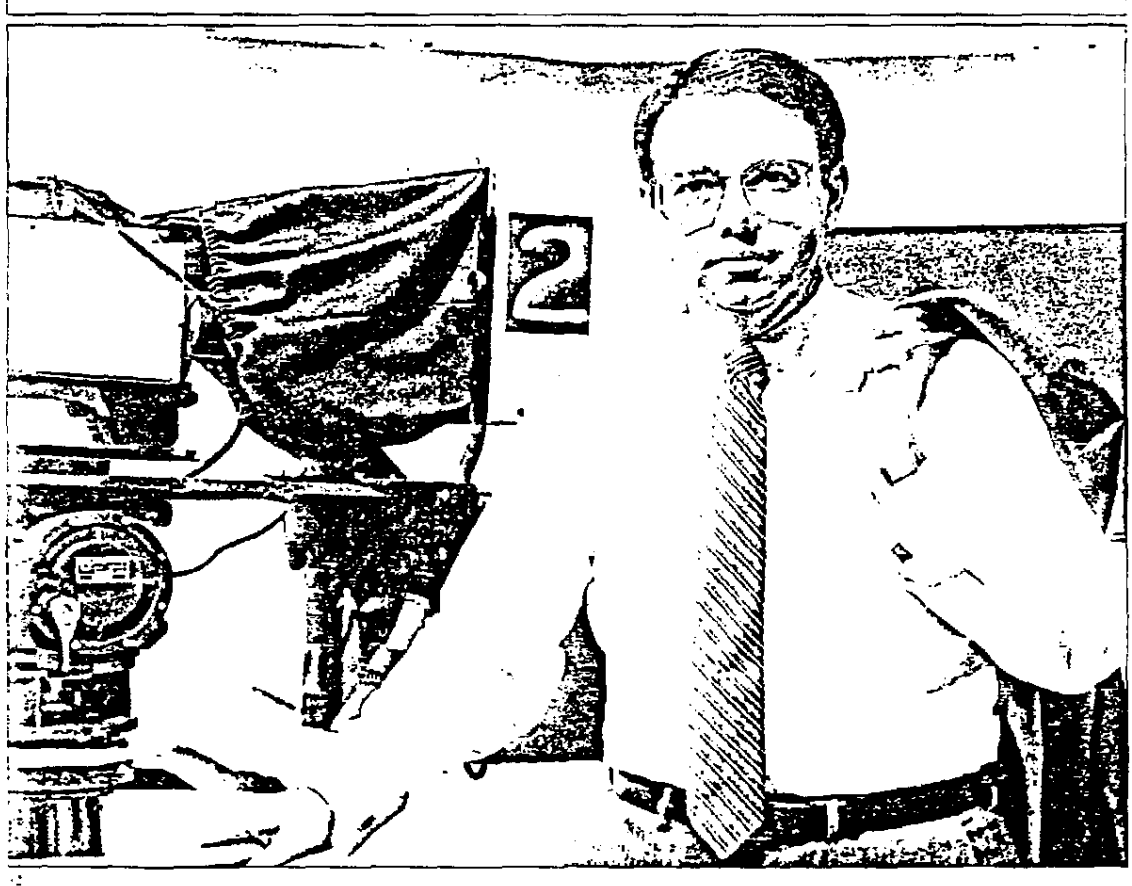
Edwin L. Behrens
Chairman, AIHC Public Affairs Committee
The Procter & Gamble Company

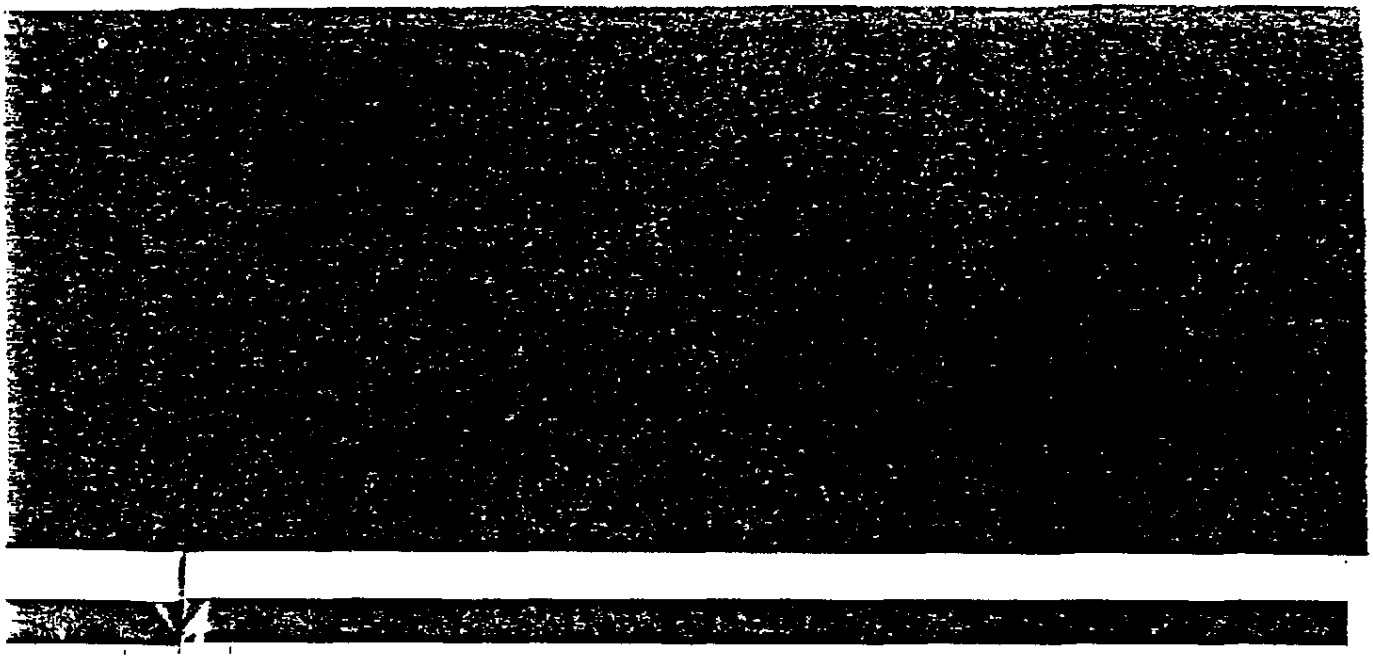
Wells Dunlop
Vice Chairman, AIHC Public Affairs Committee
Eastman Kodak Co.

COMMUNICATIONS COMMITTEE

"The primary mission of the AIHC Communications Committee is to aggressively expose the current scientific consensus on chronic health hazard issues to key media audiences."

Phillip H L. Schrader





THE MISSION — The primary mission of the AIHC Communications Committee is to aggressively expose the current scientific consensus on chronic health hazard issues to key media audiences. That consensus, largely unknown among lay audiences, centers on these positions: There is no cancer epidemic in the U.S. and no significant incidence of cancer related to the manufacture or use of chemicals; *life-style* is a key factor in cancer causation; there is a need for sound scientific risk assessment in chronic health issues; and sound scientific data should be used in delineating "safe" and "unsafe" exposures.

The Communications Committee seeks to deliver meaningful, balanced information about this consensus to key audiences: legislators, regulators and administrators, business leaders, the science and medical community, academia, and, of course, media and the general public.

Significantly, many members of these audiences believe that scientific opinion is largely polarized on health hazard issues. This belief is particularly true in the area of chemical hazards.

Often unwittingly, the media promotes this perception by covering "both sides" of an issue in a story, but giving more weight to the chemical "scare" side of the story. The problem is exacerbated as the public is exposed to several "scare" stories for each balanced article or program on these issues.

Noted scientists including Dr. John Higginson, Senior Scientist, Universities Associated for Research and Education in Pathology, and Dr. Tom Mira, Dean of the University of North Carolina's School of Pharmacy, say that there is little real conflict among scientists on these issues. Higginson has said that, "If we get 25 scientists in a room discussing an issue, you will find that 98% of the time they will agree. Unfortunately, the scientists who speak out usually represent extreme positions."

Meeting this challenge becomes even more important in light of the current public backlash against an administration perceived to be "anti-environment." Last year, the Administration appeared to be more receptive to AIHC's positions than it is in 1983 and is expected to be in 1984. AIHC must work all the harder to convey the scientists' views and their consensus on these issues.

One overriding objective of AIHC — the creation of a central science panel to integrate better science into public policy decisions — is indicative of the Council's faith in the soundness of the current scientific consensus. Congress is currently considering a bill which would establish such a panel. AIHC communications will reflect our support for this bill.

The problem is exacerbated as the public is exposed to several "scare" stories for each balanced article or program on these issues.

HOW WE CARRY OUT THE MISSION — The AIHC communications program has many elements.

One of its key components is the "Media Tour" program, in which independent scientists speak out on scientific issues on television and radio interviews and newspaper articles in selected cities around the country. "Media Tour" cities are selected on the basis of size and sophistication of the market. The scientist-spokespersons have visited nearly 100 cities. They have appeared on 241 television programs, spoken on 256 radio programs and have been interviewed by 92 newspapers. This year alone, more than 5.5 million Americans were exposed to AIHC views through these tours.

Another element of the program involves press conferences, interviews, background sessions and editorial board briefings with major news media. These activities feature independent scientists or an industry representative speaking out on scientific issues growing out of current news events.

In addition, AIHC provides informational materials (brochures, videotapes and slide presentations) on chronic health issues for AIHC member companies, trade associations, state chemical councils, the media and other audiences.

As part of its effort to educate the media, AIHC will help fund a seminar for journalists on the scientific aspects of public policy in the chronic health hazard area. The seminar, to be held early next year, will be sponsored by the University of North Carolina's School of Journalism.

Although AIHC does not have a structured speakers bureau, it does have a successful "targeted speaker placement" program. We have sought presentation opportunities and have fulfilled speaker requests for a broad range of organizations in 1983. American Paper Institute, Water Utilities Executive Council, Columbia University, American Industrial Hygiene Association, Polyurethane Manufacturers Association, Association of State and Territorial Health Officials, The Toxicology Forum, United Rubber Workers, the American Public Health Association and The American Iron and Steel Institute.

The AIHC communications effort has been successful. But by its nature it is limited. We must continue building our communications network of member companies and member trade associations in order to carry information to a wider audience. Further, we must continue to encourage the scientific community to speak out responsibly on these critical scientific issues.

The work is well under way. We have always known, however, that it will require a long-term effort. We invite AIHC members and all others sympathetic to the Council's mission to actively support it.

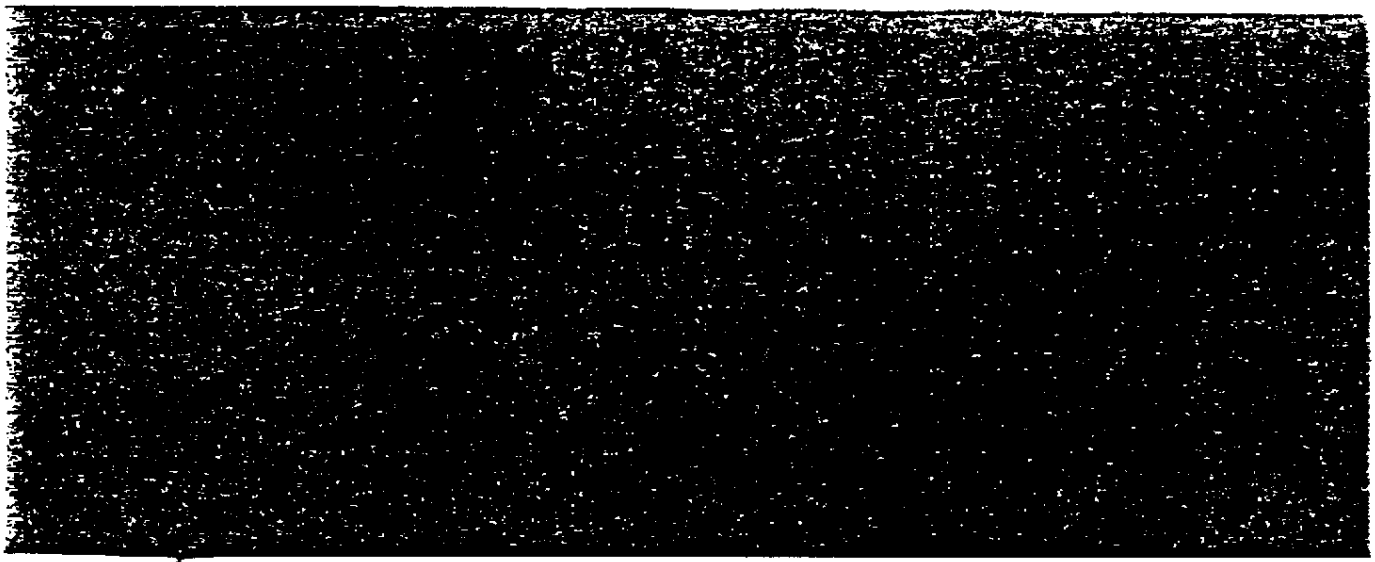
Philip H. L. Schneider
Chairman, *AIHC Communications Committee*
The Dow Chemical Company

Molly T. Lundstrom
Vice Chairman, *AIHC Communications Committee*
American Cyanamid Company

LEGAL COMMITTEE

"...a number of issues of concern to AIHC with significant legal implications have emerged or moved forward in various contexts..."

Brian F. Avedon



There has been no active AIHC litigation over the last year which would necessitate the involvement of the Legal Committee as a whole. However, a number of issues of concern to AIHC with significant legal implications have emerged or moved forward in various contexts since our 1982 annual meeting. Liaison representatives from the Legal Committee to the applicable Task Forces and Committees have been active in ensuring that legal advice in these areas is provided promptly.

CENTRAL SCIENCE PANEL – The legislative establishment of a Central Science Panel to provide guidance for risk assessment methodology, and review of key risk assessments of some of the regulatory agencies, has been a major focus of activity. Tied in with this is the issue of the legal validity of establishing individual science panels within appropriate agencies by administrative means.

CYTOGENETIC TESTING IN THE WORKPLACE – Amid claims of racial discrimination under Title VII of the Civil Rights Act of 1964, and inquiries by Congressman Gore regarding intentions of some companies to perform cytogenetic testing of employees, AIHC developed and distributed a position paper on the scientific validity of this controversial subject.

...members of the Legal Committee have been appointed as liaisons to appropriate AIHC Committees and Task Forces.

CANCER POLICIES – The OSTP Cancer Policy has moved forward more slowly than originally anticipated. Part I, which deals principally with scientific issues, such as cancer mechanisms, is nearing completion. The first draft of Part II, which is to deal with the key policy issues, has not yet been circulated as an initial draft. Part II will undoubtedly need close scrutiny by the AIHC Legal Committee in the months ahead.

The long-awaited amendments to the OSHA Cancer Policy regulations have come to a stand-still somewhere between OSHA and OMB. When a proposal is forthcoming, the Legal Committee will have to give careful consideration as to how best to assure that these amendments carry out the mandate of the Supreme Court as set forth in the *Benzene* and *Cotton Dust* decisions.

EPA seems to have abandoned a formal regulatory route for its Cancer Policy under Section 112 of the Clean Air Act and has opted for "internal guidelines" to be used by the EPA in the regulation of individual hazardous air pollutants. EPA did, however, ask for comments on its guidelines from key associations such as AIHC and from public interest groups. AIHC developed a comprehensive submission on certain scientific issues relating to quantitative risk assessment, which were keyed to a benchmark decision by the Fifth Circuit Court of Appeals in a suit involving CPSC's formaldehyde regulations.

VICTIM COMPENSATION – Finally, a major legal/legislative issue to emerge in 1983 is that of "victim compensation". While the Chemical Manufacturers Association is taking a lead role in this area, AIHC is attempting to develop guidelines on the issue of causation, i.e., an approach to determining whether an individual's adverse health condition has in fact been caused by exposure to a particular substance(s). This will be a vital link in any compensatory or other scheme that is ultimately enacted by Congress to alter traditional common law remedies.

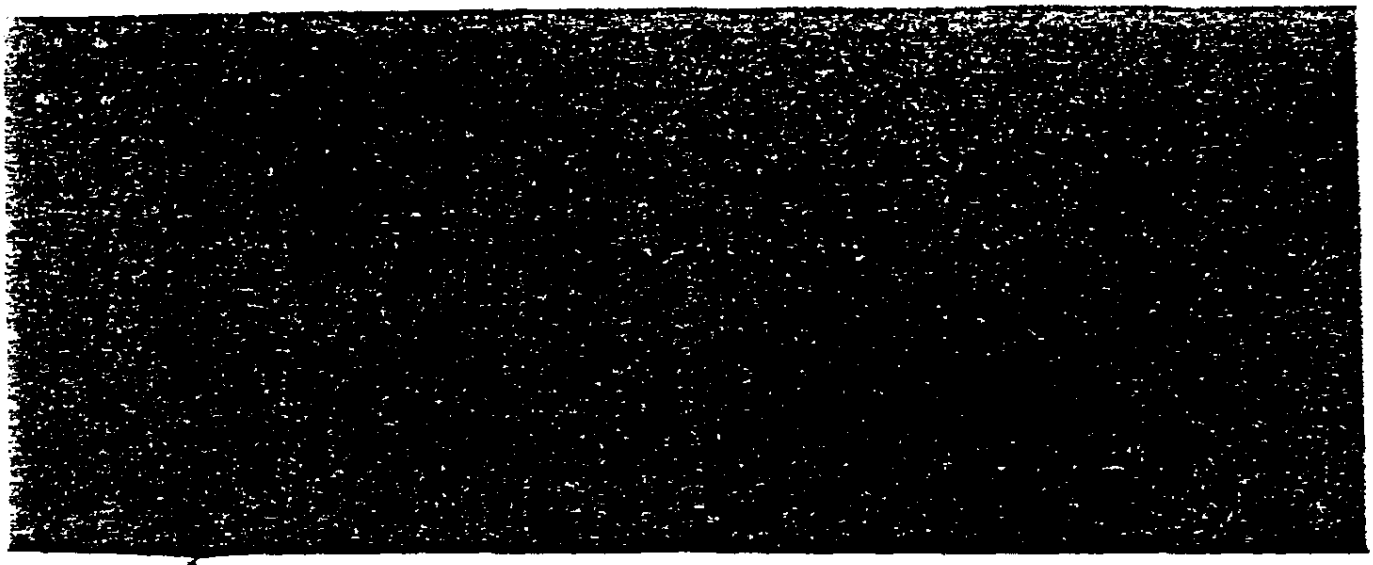
LEGAL COMMITTEE ORGANIZATION – To complement the AIHC organizational structure and to render legal advice most efficiently, members of the Legal Committee have been appointed as liaisons to appropriate AIHC Committees and Task Forces. These attorneys will function as working members of the groups to which they are assigned, and it is hoped that this will assure timely legal advice on significant issues as they emerge and as an AIHC position is established. Where a legal issue is particularly significant, the entire Legal Committee will also review the matter.

Bevan F. Aurelius
Chairman, AIHC Legal Committee
Shell Oil Company

FINANCE COMMITTEE

"During 1983, AIHC is operating on a balanced budget... we were able to do this in spite of the fact that dues for 1983 were maintained at a level no higher than those in 1982."

Robert L. Mitchell



BALANCED BUDGET — During 1983, AIHC is operating on a balanced budget, with expenditures estimated at $1,475,000. We were able to do this in spite of the fact that dues for 1983 were maintained at a level no higher than those in 1982. We have felt it prudent to maintain a reserve equal to approximately 20% of annual expenditures to provide for unanticipated needs. The reserve at the end of 1983 is estimated to be $340,000, which compares with $383,400 at the end of 1982. Budgeted expenditures for 1984 are $1,417,500, which should provide a year-end surplus of $270,000.

INCREASED ACTIVITY, MAJOR CHANGES IN GOVERNMENT — 1983 was a year of increased activity in the environmental and health arena. Major changes have taken place in EPA. These changes were accompanied by increased regulatory pressures. These pressures will continue and accelerate in the presidential election year of 1984, and the need for the application of adequate scientific bases to problem-solving will be again emphasized by AIHC.

In preparing the 1984 budget, the Finance Committee took into consideration the need to continue supplying scientific expertise to the federal regulatory agencies. In addition, efforts will continue toward creation of a General Science Panel.

DUES PROPOSAL — The dues structure has not changed since the beginnings of AIHC. In order to properly fulfill the objectives of AIHC in 1984, and at the same time maintain a reserve fund of approximately 20%, the Finance Committee recommended to the Executive Committee and Board of Directors that the current dues base be maintained, but that the maximum be increased from $25,000 per year to $30,000 per year. This recommendation received their approval and will be presented to the membership for approval at the annual meeting.

NEW MEMBER DEVELOPMENT — A major need exists to increase the membership of AIHC. Heretofore membership responsibility has resided in the Finance Committee. Early in 1983, the Finance Committee recommended to the Executive Committee that a separate Membership Committee be appointed. This recommendation was approved and implemented.

...the Finance Committee took into consideration the need to continue supplying scientific expertise to the federal regulatory agencies.

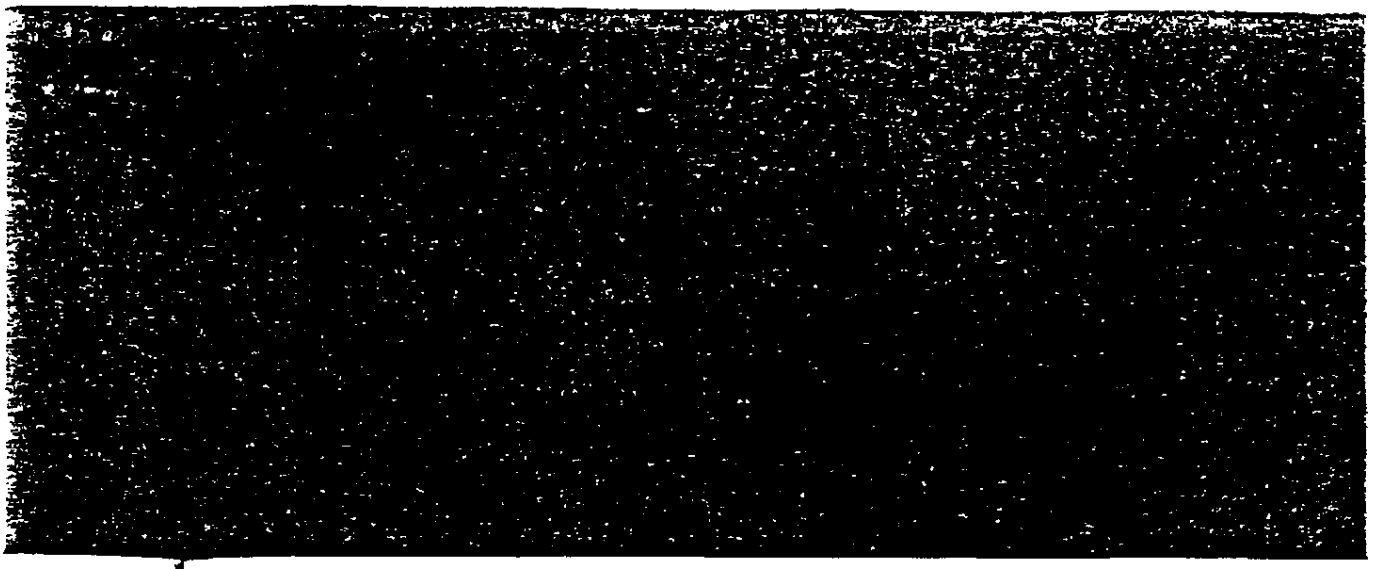
As in the past, the other major resource available to AIHC is the time spent on AIHC matters by member company executives. Our success is heavily dependent on the continued dedication by member companies of this time and talent.

Robert L. Mitchell
Chairman, AIHC Finance Committee
Celanese Corporation

ASSOCIATIONS COMMITTEE

"(The Associations Committee) plays an important informational function in reaching virtually every interested industrial organization in the country."

Theodore E. Brenner



COMMUNICATIONS LINK – The Associations Committee serves as a link between the operational committees of AIHC and a broad range of trade associations. As such, it plays an important informational function in reaching virtually every interested industrial organization in the country.

The Committee does not initiate programs itself nor does it take positions on specific issues. It does, however, provide its membership with up-to-date information on AIHC activities by means of frequent mailings and regularly scheduled meetings. In this manner, material developed by AIHC can be quickly disseminated to the membership of the constituent trade associations which make up the membership of the Committee.

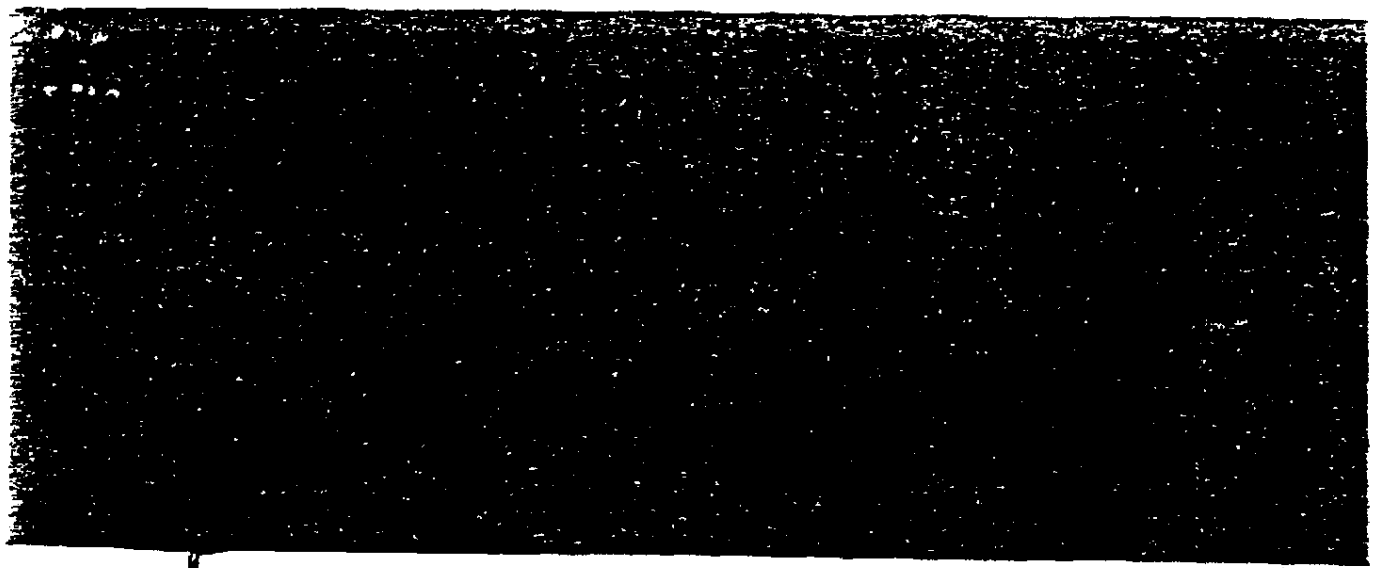
... serves as a link between the operational committees of AIHC and a broad range of trade associations.

EIGHTY-FIVE ASSOCIATIONS – At the present time 85 trade associations are members of the Associations Committee. Based on input from many of these groups, it seems that the services provided by the Committee are useful and appreciated.

The Committee requires no funding from AIHC other than the costs of duplicating and mailing appropriate materials and related staff expenses.

Theodore E. Brenner
Chairman, AIHC Associations Committee
The Soap & Detergent Association

J. Lawrence Robinson
Vice Chairman, AIHC Associations Committee
Dry Color Manufacturers Association



Additional information and supporting documents
can be obtained from the American Industrial Health Council

In New York, contact:
American Industrial Health Council
1575 Central Park Avenue
Scarsdale, New York 10583
(914) 725-1492

In Washington, contact:
American Industrial Health Council
1612 K Street, N.W.
Washington, D.C. 20006
(202) 659-0060

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20th Semiannual Meeting

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NOVEMBER 24, 1970

The New York Hilton

New York, N.Y.

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Westhoff, W. M.
Wiegand, Robert A.

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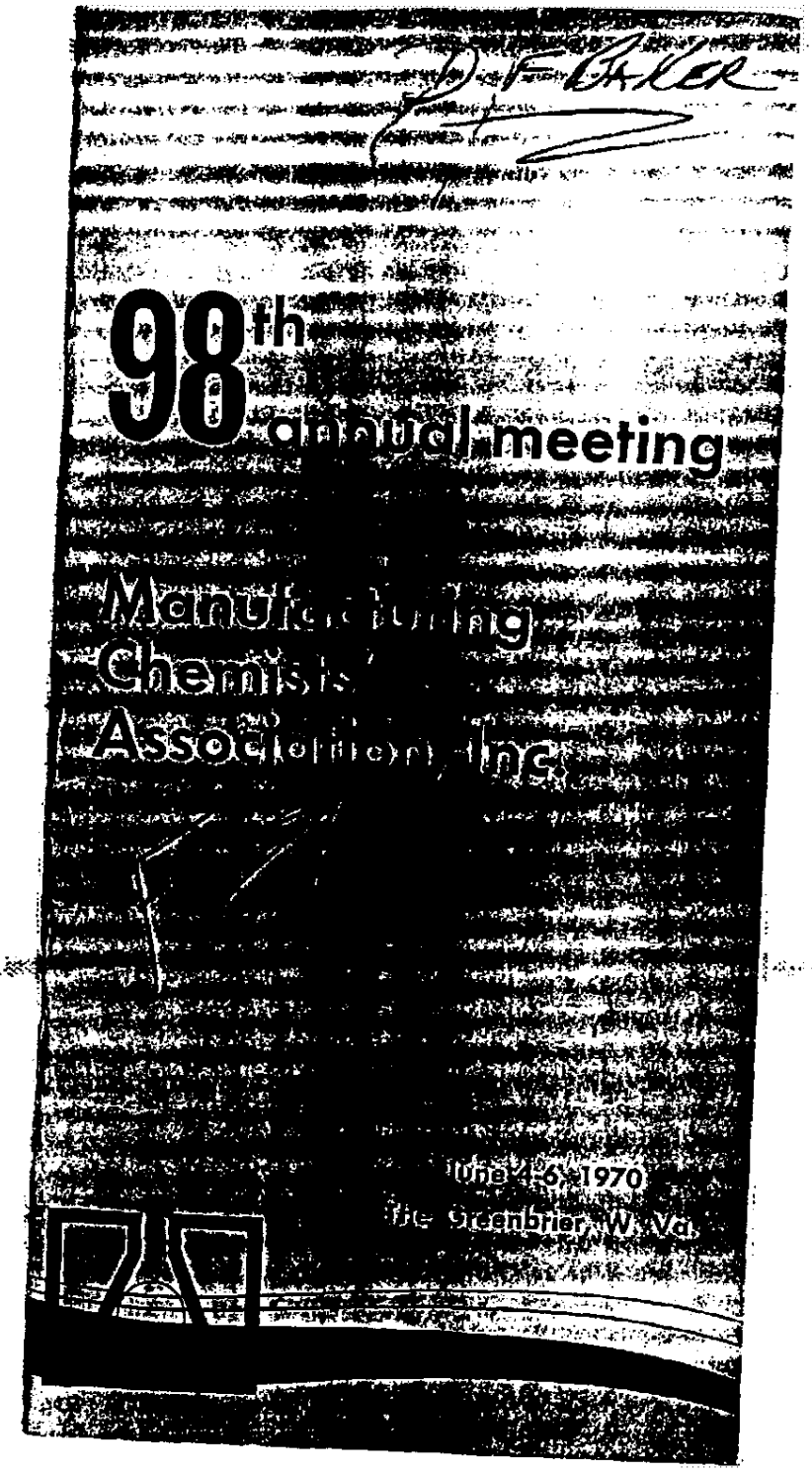
Hantho, C. H.
Hynes, Leonard
Redwood, G.
Roberts, G. S.
Taylor, W. A.
Wilkinson, M.
Wilson, W. M.

CARUS CHEMICAL COMPANY, INC., DIVISION OF CARUS CORPORATION
Boll, Ed


98th
annual meeting
Manufacturing
Chemists
Association, Inc.
June 2-5, 1970
The Greenbrier, W. Va.

AP00037125

Company Representation

AIR PRODUCTS AND CHEMICALS, INC.

Adams, Ross
Baker, Dexter
Carey, Larry
Donley, Ed
Fleming, Richard
Harwell, Hod
Hoge, Wes

AIR REDUCTION COMPANY, INC.

Behme, Hermann W.
Dann, Theodore E.
Dillon, George S.
Jaffe, Harold
McFarlane, Norris B.
Munson, Charles S.
Tinnon, John M.
Wohlwend, Alfred N.

ALLIED CHEMICAL CORPORATION

Ashley, Richard C.
Aust, Walter D.
Austin, Laurence H.
Baker, Arthur H.
Barnard, John H.
Baxter, Raymond C.
Bissinger, Frederick L.
Bradford, David H., Jr.
Brown, Chester M.
Buckles, Bennett D.
Coli, G. John
Connor, John T.
Fooshee, Irb H.
Furrow, Brian D.
Kazan, George
Kelley, James W.
Korbel, Edward J., Jr.
McCambridge, R. Stewart
Schultze, Helmuth W.
Teverbaugh, Harold C.

ALUMINUM COMPANY OF AMERICA

Fox, J. R.
Kaltwasser, A. B.
McGowan, J. A.
Townsend, F. M.

AMERICAN CYANAMID COMPANY

Daniels, R. W.
Fasoli, J. M.
Forbath, T. P.
Forlenza, G. A.
Goodall, D. A.
Hazell, T. E.
Latimer, R. B.
Ludden, J.
Nehms, H. E.
Noble, R. E.
Russell, G. W.
Schmidlein, J. A.
Siverd, C. D.
Sommer, N. B.
Swain, R. C.
Turchan, T. P.

AMERICAN HOECHST CORPORATION

Brookhuis, J. G.
Hamann, H. C.

AMERICAN POTASH & CHEMICAL CORPORATION, A SUBSIDIARY OF KERR-MCGEE CORPORATION

Clines, W. M.
Francis, W. J. F.
Hefler, R. J.
O'Brien, W. F.
Young, W. W.

AMERICAN ZINC COMPANY

Custer, E. A., Jr.
Schwarz, F. K.

AMOCO CHEMICALS CORPORATION

Brooks, George C.
Cudd, Herschel H.
Glatthaar, Jack R.
Kennel, William E.
Lambertsen, John G.
Wommack, S. Jackson

THE ANSUL COMPANY

Arkens, Henry E.
Hood, Robert C.
Neuville, Morrie L.
Rinelli, William R.

ARAPAHOE CHEMICALS, DIVISION OF SYNTEX CORPORATION

Waugh, Richard C.