Where can I get more information on AIHC and the proposed OSHA carcinogen regulations?

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background information

What is the American Industrial Health Council?

American Industrial Health Council is a newly-formed organization of American companies which are coordinating their scientific and administrative resources to develop new, practical standards for employee health in the industrial workplace.

Who are the members of AIHC?

As of March 1st, 1978, AIHC was composed of over 90 companies and 30 trade associations.

Although the organization's early membership has been concentrated in the chemical industry, virtually all American industries are expected to be represented in AIHC because new worker health standards are of critical importance across the American industrial spectrum.

What kind of support does AIHC receive from its member companies?

The most important support is the contribution of scientific personnel and data for the planned formulation of new worker health standards. Member companies are also contributing other personnel and the financial support necessary to coordinate this important activity.

Is there a specific or immediate task for AIHC scientific and administrative personnel?

There is indeed.

It is to assist the U.S. Occupational Safety and Health Administration in developing a rational and practical standard for regulating carcinogens in the workplace.

March, 1978

Why is the OSHA carcinogen regulation of such pressing importance?

For two basic reasons:

First, OSHA is engaging in what may well be the most complex and far-reaching governmental regulatory proposal ever made in connection with the workplace. The regulation of carcinogens would have direct bearing not only on those companies which *produce* a wide variety of chemical substances, but also the many companies that *use* such substances in processing, manufacturing, packaging or distribution—in short, almost all of American industry. The effect on American business—including *small* business—could well be monumental.

Second, other federal agencies, including Environmental Protection Agency, Food and Drug Administration and Consumer Product Safety Commission are considering patterning their regulation of carcinogens on OSHA's final standard. In effect, OSHA is developing the national standard on the regulation of carcinogens.

What is the essence of the proposed OSHA standard on carcinogens?

The OSHA proposal is long and complex (it is contained in a 100-page proposal; see October 4th Federal Register, volume 42, number 192, pages 54147-54247). However, at the heart of the proposal are regulations setting forth criteria for determining whether a substance is a carcinogen; establishing "categories" for suspect and known carcinogens; and requiring certain regulatory actions to be taken for substances in each category.

OSHA is also proposing to abandon its substance-by-substance approach to regulating carcinogens in favor of broader rule-making procedures. The focus of these procedures will most likely be the list of "Suspected Carcinogens" compiled by the National Institute for Occupational Safety and Health—several thousand substances.

What's wrong with the proposed OSHA standard?

Most importantly, it is scientifically unsupportable.

In attempting to deal in broad categories of carcinogens, OSHA appears to be disregarding the opinion of National Cancer Institute scientists who recently concluded that general, unqualified principles could not be formulated to define carcinogens for regulatory purposes. In a 1976 report, the Institute's National Advisory Board Committee on Environmental Carcinogens cautioned that:

> "the Subcommittee recognizes that at present there is no simple and universal definition of either carcinogenesis or neoplasia. The criteria which are described are general guidelines and not rigid, universal criteria. The complexity of the problem dictates that the evaluation of the potential human hazards of a given agent must be individualized in terms of the chemical and metabolic aspects of that agent, its intended use(s), the data available at the time that the decision must be made, and other factors pertinent to the case under consideration. *Each case must be considered on its own and the criteria appropriate for one agent may not necessarily apply to another.*" (Emphasis added)

The OSHA categorization scheme, according to AIHC scientists, is overly simplistic, ignores differences in metabolic pathways and detoxification mechanisms, and rejects the important concept of a dose-response relationship.

As proposed, the OSHA standards would obligate OSHA to consider banning such substances as table salt, gold, several common sugars, selenium (a human nutrient) and even asphalt from the American workplace.

How will AIHC help develop employee health standards for the workplace?

Relating to the proposed OSHA carcinogen regulation, AIHC will first gather the best scientific data available on the subject. Papers are already in preparation on subjects such as:

Massive Dose And Its Effect On Metabolism
Potency And Latency Period
Tumorogenicity And Carcinogenicity
Extrapolation Of Animal Data To Man
Risk Analysis
Zero Risk—Impossibility Of No Exposure

Leading independent scientists from across the country and around the world were invited to present their views on the proposed OSHA standard as well.

Data is also being gathered on the likely economic burden of the OSHA standard. This could include the cost of repeated complete physical examinations of employees; extensive new record-keeping; expensive engineering controls; new monitoring equipment; much wider use of respirators; and even the possibility of isolating plant lunchrooms.

Scientific, economic and other data gathered by AIHC will be made available to any interested company. AIHC can also assist companies in using such scientific and economic data in testimony during OSHA's 1978 hearings on the proposed carcinogen regulations.

What are the key dates in the development of OSHA's carcinogen regulatory process?

Subject to change with little notice, the key dates in the process are:

February 28th — Deadline for submitting written comments or notices of intent to appear at the public hearings as well as copies of the actual hearing testimony.

April 4th — Date by which OSHA must file testimony and comments. Since this date is six weeks after the deadline for industry and other comments, OSHA currently has the opportunity to rebut such comment when it files.

May 16th — Beginning of public hearings.