



INTERNAL CORRESPONDENCE

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CHEMICALS AND PLASTICS

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Date February 12, 1979

Originating Dept. SHARE - EP/OH

cc to

Subject IRLG Cancer Policy

Mr. T. W. Carmody - NYO,22
Mr. F. M. Charles - NYO,22
Mr. L. A. Crisorio - NYO,21

Gentlemen:

Enclosed is a copy of the Interagency Regulatory Liaison Group report, "Scientific Bases for Identifying Potential Carcinogens and Estimating Their Risks", which will be published soon in the Federal Register for public comment. This important document will guide the regulatory response of EPA, OSHA, CPSC, and FLA relative to carcinogens.

The Scientific Committee of AIHC plans to comment extensively, following a detailed review by the membership and perhaps outside consultants (a meeting with outside consultants is tentatively scheduled for March 1).

As a member of the Scientific Committee, I have been asked to supply the Chairman and Counsel by 2/23/79 with answers to the following questions relative to Part III, Quantitative Estimation of Risk:

1. What does the report suggest or require?
2. What are the deficiencies?
3. What have been past AIHC positions on major issues?
4. What goals should AIHC attempt to achieve?
5. What are specific recommendations to achieve such goals?

Our subgroup of the Scientific Committee reviewed Part III of the IRLG report one evening for the purpose of making general comments to the full Committee the next day. Basically our objections were that IRLG did not properly represent the diversity of opinion on scientific issues or adequately discuss their reasons for adopting positions that were selected.

Any input you could make relative to Part III or the total report would be appreciated, especially that which would be timely for my deadline.

Some of you have seen an early draft of the EPA Interpretative Ruling on Ambient Air Carcinogens, which is to be published by EPA by the end of February for comment. AIHC will also plan to respond to this proposed rule.

Sincerely,

F. D. Bess

FDB/klw
Enclosure

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- tentative conclusions that can be developed into a position with media
- what sections need further consideration

THE REGULATORY COUNCIL

401 M Street, S.W.
Washington, D.C. 20460

February 6, 1979

Mr R.N. Wheeler

CHAIRMAN
Douglas M. Costle

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Regulatory self survey
Statement by Regulatory Council Chairman Douglas M. Costle on the IRLG document describing the bases for identifying carcinogens and estimating their risks.

"The Interagency Regulatory Liaison Group has spelled out a solid scientific foundation for developing a national policy to combat the public health threat posed by cancer-causing substances in the environment, workplaces, consumer products, and food.

This report is particularly significant for several reasons:

- It deals with a key component in our programs to control cancer, the second most serious health problem in the United States today.
- It demonstrates that different agencies working under different statutes can themselves agree on a common scientific basis for their regulatory programs.
- It provides a basis for the development of a common, government-wide carcinogens policy.

Developing this policy is a major goal of the Regulatory Council, which I currently chair. This agreement on scientific techniques for cancer assessment is a major step toward this goal. The Council will build on this effort a framework for consistent actions by all Federal regulatory agencies.

The report also provides important information to the public on how and why the government decides that controls are needed on consumer or industrial substances that pose a cancer risk. It explains the reasoning behind using test animals to represent people, giving these animals large doses of test substances and conducting other

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procedures, the merits of which have been hotly debated in the case of vinyl chloride, certain pesticides, and other compounds. In all of these areas, I believe the document summarizes the best current judgements of the scientific community on the issues involved.

The Nation needs coordinated programs to deal effectively with cancer, and this report is a key part. I want to congratulate the scientists from the six agencies --Food and Drug Administration, Environmental Protection Agency, Occupational Safety and Health Administration, Consumer Product Safety Commission, National Cancer Institute, and National Institute of Environmental Health Sciences-- who worked together to prepare the document."