

January 12, 1977

Mr. William J. Driver
President
Manufacturing Chemists Association, Inc.
1825 Connecticut Avenue, N. W.
Washington, D.C. 20009

Dear Bill:

Recently I saw a clipping from the Washington Star where you commented on PVC with the following statement: "PVC is contained in so many things. And it was on the market for years before the harmful effects were found."

Now, I fully recognize that that may not even be an approximation of what you actually told the reporter. On the other hand, that statement did prompt me to suggest that in the future you refer to vinyl chloride as the bad actor. PVC itself is in no way harmful to anyone. I know what you meant, and I even agree with what you meant. The problem, of course, is the continuing general lack of understanding about the kind of toxicity problems faced by the PVC producers because of vinyl chloride.

To this end, I believe you would find interesting the enclosed brochure prepared by the VCM/PVC Producers to help reporters understand.

I hope our paths cross soon.

Cordially,

RLH:sms

ENCL.

cc: Al Clark
Nick Nuechterlein
John Lawrence

SPI23457

The Society of the
Plastics Industry, Inc.



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Ralph L. Harding, Jr.
President

December 1, 1977

TO: PUBLIC AFFAIRS COMMITTEE

SPI RESPONSE TO OSHA

We need to bring you up to speed now on the proposed OSHA anti-cancer regulations because there is much to be done directly on behalf of SPI's members.

As background for next Tuesday's discussion, enclosed is a representative cross-section of information received to date plus some SPI correspondence. Bud Lundgaard, John Lawrence and I will try to give you a fuller report verbally. Earlier John sent you a copy of the Snell questionnaire. Not enclosed but available is the full text of the OSHA proposal:

"Identification, Classification, and Regulation of Toxic Substances Posing A Potential Carcinogenic Risk" - Federal Register Volume 42 No. 192, Tuesday, October 4, Pages 54148 - 54195.

In capsule form here are some key points:

1. Timetable - OSHA has now responded in part to industry requests by moving back the timetable as follows:
 - January 30 - all industry statements and proposed testimony
 - March 15 - OSHA's testimony available to us
 - April 4 - Hearings commence (expected to last for several weeks)
2. American Industrial Health Council - Formed by the Chemical Industry as an ad-hoc group to develop and coordinate the industry's response. Chaired by Paul Oreffice, President - Dow U.S.A. Their original request for \$25,000 each sent to 40 companies has already raised \$800,000. Nine sub-committees: Alternatives, Scientific, Legal, Economics, International Liaison, Association Liaison, Labor, Public Affairs, Public Relations.
3. Role of AIHC - Mr. Oreffice has stated that the AIHC will function as the "arsenal" (my word), providing information and assistance, as well as the coordinating body. He wants a "cast of thousands" (his words) to be ready to testify - every company and every association that's willing.

SPI23458

This is a key point: AIHC will not do the job for the industry; it will help each of us do our own thing.

4. Communications - In their necessary first pre-occupation with preparing responses to OSHA (original deadline December 8), AIHC has not had time to spend on developing any kind of communications plan - either internal or external. I had hoped by now to be able to send you their first background bulletin, reporting on their activities to date - there is none. Incidentally, at this point, the chemical industry's leading PR and PA specialists have not been brought together and asked for their collective recommendations.
5. Strategy - As of now, there is no basic strategy being developed for all of the PR and PA activities needed in support of the direct response to OSHA. Apparently, there is not enough perception yet that all of these "indirect" activities may be at least as important as the direct preparations for the OSHA hearing-circus in April. Unless (and that's a key word) these considerations receive proper attention, SPI may have to go our own way in order to bail our processors out as much as possible.
6. SPI Role in Support of AIHC - SPI members are well represented (indirectly) on the AIHC Steering Committee. Keith McKennon of Dow, member of the PAC PR Committee, is the key staff man for Mr. Orefice in this endeavor. We have very high regard for Ron Lang of the Synthetic Organic Chemical Manufacturers Association. In addition, we have volunteered to provide staff support for the International Liaison and the Public Affairs sub-committees.
7. SPI's Role On its Own - Whether as part of AIHC or separately, we need to develop our own case and marshall our own witnesses. We also need to develop our own communications strategy and our plans to work with our support system. The question is: do we lock into AIHC or do we pull back and salvage what we can for our own membership? My answer goes back to #5 - "Unless...."
8. PAC's Role - Chairman Reed Estbrook has asked the following to be part of an initial OSHA task force: Messrs. Lundgaard, Toohy, Malone, Schoen, Hidding, DeMatteo. I've named John Lawrence as the Staff Issue Manager, to be assisted by Messrs. Nuspliger, Sherman, Titus, Hadley (Keller and Heckman), Hearle (Hill and Knowlton) and Harding. This group will meet on Tuesday after the PAC meeting adjourns. Anybody else who wants to stay on is welcome.
9. Decisions - The background will be provided during the regular PAC meeting. The second meeting will be needed for agreement on SPI's strategy - with AIHC and for ourselves. Among the questions:
 - a. How should we be organized: Task Force - Sub-Committees - Staff?