# 1981 Report to the Membership

AIHC American Industrial Health Council

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

*". . . science should be considered as important a component in the development of federal regulatory policies . . . as economics and law."*

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

The Public Affairs Committee's primary function is to provide guidance to the Board and the AIHC committees regarding the translation of scientific, economic and legal principles into public policy areas and to develop and recommend appropriate strategies for impacting legislative, regulatory and administrative proposals relative to AIHC interests. It also provides advice to the Board on evolving issues of likely interest to AIHC and is responsible for developing and maintaining appropriate contacts in the Government with reference to AIHC's objectives.

Since its inception in 1977, the American Industrial Health Council has been working with government to develop a more rational process for regulating potential carcinogens and other materials associated with similar chronic health concerns, where regulation is warranted.

Our approach is to work with senior policy officials of this Administration, as we did with the previous Administration, urging the need to better define the role of science in the regulatory process, to offer organization concepts for achieving feasible separation of scientific and social policy determinations, and to propose steps for ensuring the adequacy and quality of that science which serves as the basis for federal regulatory actions. Legislative actions have been initiated where they have served AIHC's overall federal policy objectives, although AIHC does not conduct a lobbying program.

Over the past year, the Public Affairs Committee has actively contributed to decisions and actions by the AIHC Board and Executive Committee, the Science Policy Task Force, the Science Panel Task Force, the Executive Agencies Task Force, and the Scientific Committee. The Committee has also had direct involvement in legislative and other activities of specific interest to AIHC.

The Committee is pleased to report on a number of these activities in which it has been involved.

*Regulatory Reform Legislation:* AIHC has contended that science should be considered as important a component in the development of federal regulatory policies on chronic health hazards as economics and law. Specifically, we have recommended

that actions taken by agencies to validate the scientific bases for proposed major regulations be explicitly identified for review by the public and the President.

*Action:* Both the Senate and House versions of the omnibus regulatory reform bills (S. 1080 and H.R. 746, respectively) have included such a provision during markup this year. Other features of these bills which have been supported by AIHC in the past, such as a meaningful and effective "regulatory analysis" requirement to evaluate the likely impacts (both favorable and adverse) for all major rules, have been maintained.

In addition, the Administration has recently affirmed that Executive Order 12291 is intended to ensure the adequacy of the scientific data serving as the basis for proposed regulatory actions of the various federal agencies.

*Executive Branch Oversight and Coordination:* AIHC has supported OMB's role within the Executive Office of the President, executing the central management functions of oversight and coordination of regulatory agency activities. However, AIHC has further advocated that OMB should consult with the President's Office of Science and Technology Policy (OSTP) on matters of science, rather than to defer routinely to the agencies' expertise.

*Action:* In one of his final official acts, Dr. James Miller, former Administrator of the Office of Information and Regulatory Affairs for OMB, appeared before a House Subcommittee and was assisted in testimony by a high-level representative of OSTP. Both by this joint appearance and by his statement, Dr. Miller affirmed this Administrations's commitment to sound science, announcing that OSTP would be included in OMB's regulatory review efforts. In addition, the Vice President recently announced that Dr. George Keyworth, Director of the Office of Science and Technology Policy, would be joining the Task Force for Regulatory Relief. This, too, is consistent with AIHC recommendations.

*IRLG:* AIHC has advocated that agencies improve coordination of their actions, and we initially supported the Carter Administration in its formation of the Interagency Regulatory Liaison Group (IRLG), an inter-agency coordination effort. It has become clear that the coordination effort has not worked well. AIHC believes that the IRLG suffered from the lack of a sound management process, so we have recommended that some central management function (such as that which might be provided by the White House) should assume this responsibility.

*Action:* Recently, the IRLG was disbanded, and inter-agency scientific and other related activities will be subsequently coordinated by OSTP.

*Science Panel:* AIHC supported action by the Congress last year, appropriating $500,000 for a study by the National Academy of Sciences of risk assessment and related institutional models for federal decision-making.

*Action:* This contract between the Administration and the NAS was signed in September. The Chairmen of the Science Panel Task Force, the Scientific and Public Affairs Committees contributed directly to the NAS Committee's deliberations by presenting AIHC's proposal for a Science Panel.

*AIHC/Brookings Congressional Seminar:* A seminar on chronic health effects issues, presented jointly by the Brookings Institution and AIHC in July, was a resounding success. This seminar, conducted for Congressional members and staff, along with leading decision-makers from the Executive Branch, attracted more than 150 people to hear eminent scientists and thought-leaders discuss issues involved in chronic health policy development. Department of Health and Human Service Secretary Schweiker was the featured luncheon speaker. A leadership dinner the night before, which included all of the speakers and a number of the AIHC Board, was attended by Senator Thomas Eagleton; Congressmen Jim Martin (R-NC), George Brown (D-CA), Don Fuqua (D-FL), and Don Ritter (R-PA); NAS President, Frank Press; and, Dr. George Keyworth of OSTP, among others. Response from the participants has been extremely favorable.

The proceedings of the seminar are to be published by the Brookings Institution.

*Qualifications and Criteria Document:* The Committee led an AIHC effort prior to last year's election to develop on a non-partisan basis a manual for use in establishing the new Administration. The manual addressed organizational and staffing recommendations for relevant White House and agency functions on a department-by-department basis. Over 150 of these manuals were distributed to the Transition Team and subsequently to the Administration; a number of the recommendations and concerns appear to have been recognized.

AIHC and the Public Affairs Committee take pride in seeing this Administration's recognition of the role of sound science in the development of federal policies concerning chronic health hazards, and we look forward to the challenges in the months ahead. There will be continued opportunities for improving the science base for regulatory actions via legislation on a statute-by-statute basis (e.g., Clean Air, Food Safety, etc.). The Committee will follow these activities closely and keep AIHC apprised as to how its objectives can be best achieved.

The Committee will continue to encourage dialogue between AIHC and senior policy officials in this Administration as well as with other interested parties, sharing our views as to how federal regulations affecting chronic health concerns should be predicated.