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From: Steve Taylor <stevetaylor@preventharm.org>
Sent: Friday, December 30, 2011 2:06 PM
To: NIOSH Docket Office (CDC)
Cc: Charlotte Brody; Mike Belliveau
Subject: Comme 240nts to Docket
Attachments: EHSC NIOSH Docket 240 Comments.doc

Submitted via email at 2:05 PM eastern time on December 30, 2011

To whom it may concern:

Attached please find a submission from the Environmental Health Strategy Center to NIOSH Docket 240 (Request for Information: Announcement of Carcinogen and Recommended Exposure Limit (REL) Policy Assessment).

Thank you for your consideration of our comments.

Steve Taylor

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To: NIOSH Docket Office
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Submitted by e-mail to: nioshdocket@cdc.gov

From: Steve Taylor, Program Manager, Environmental Health
Strategy Center

RE: Request for Information: Announcement of Carcinogen and
Recommended Exposure Limit (REL) Policy Assessment, Docket
Number NIOSH-240

The Environmental Health Strategy Center welcomes NIOSH's review of its carcinogens policy. Founded in Maine in 2002, the Environmental Health Strategy Center promotes human health and safer chemicals in a sustainable economy. We believe that every person has a right to a clean and healthful environment wherever they live, work, learn or play. We envision a future that provides good green jobs, healthy communities, and social justice for all. We focus on two program areas – Healthy People, which seeks to improve health through safer chemical policy reform at the federal and state levels, and Sustainable Economy, which models a green chemistry economic development strategy to produce bioplastics from Maine potatoes and other biomass. □□ Through the Strategy Center's leadership, the State of Maine has set the pace nationally for policy solutions that protect human health from unnecessary toxic chemicals, such as mercury, lead, arsenic and PBDE flame retardants. In 2008, we led the campaign to pass the Kid Safe Products Act, the first comprehensive safer chemical policy reform in the United States. □□ We lead two successful, collaborative partnerships, the



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Alliance for a Clean and Healthy Maine, a health-based coalition working to replace unnecessary dangerous chemicals with safer alternatives, and the Sustainable Bioplastics Council of Maine, a business-based coalition that aims to boost Maine's green economy through the use and development of non-toxic, petroleum-free and bio-compostable products.

This experience has led the Environmental Health Strategy Center to question the use of risk assessment and the resulting use of RELs and action levels for substances that have no safe level of exposure. We believe that RELs and action levels can create a false sense of security based in politics instead of science. Over-reliance on risk assessment for decision-making also misses common-sense pollution prevention opportunities. We believe that when safer alternatives are available, hazardous chemicals do not belong in consumer products or workplaces in any amount and should be phased out.

In 2009, the National Academy of Sciences (NAS) cited the failure of risk assessment to support timely decisions or best solutions to environmental health threats. NAS said that rather than determining an acceptable level of risk for a given exposure scenario, EPA should use risk assessment to characterize which solution is preferable among risk management options identified in advance. This would align EPA science policy with similar methods such as technology options analysis, alternatives assessment, and substitution planning.

The Environmental Health Strategy Center's response to Docket 240's five questions is a recommendation that NIOSH consider a new health-based approach to carcinogens that is based on the 2009 NAS recommendations.