

Harvard Center for Risk Analysis



Memorandum

To: Jonathan Wiener

From: John D. Graham *JDS*

Date: June 26, 1992

Subject: The Release of Risk Assessment as a Regulatory or Policy
Action: The Case of ETS

Before reading this memorandum, please skim the attached article on the health risks of environmental tobacco smoke (ETS) from Newsweek (6/29/92), which presents a fair summary of EPA's recent risk assessment of ETS.

The public policy implications of EPA's ETS assessment are enormous, even though this risk assessment is not apart of a formal rulemaking proposal that will go to OMB. Aside from the report's direct influence on public acceptance of smoking, EPA's risk assessment of ETS will stimulate state and local regulatory practices and ordinances, and also place pressure on OSHA to move more quickly on its indoor air policy. In the longer term, the report may help stimulate a whole new wave of tort liability litigation by nonsmokers who work and/or live with smokers.

Since I am not an expert on ETS, I don't know whether EPA's report is based on good science. When I asked informally several colleagues about the report, several said it had exaggerated the risks, several said it was in the ballpark, and none said that the risks of ETS had been understated by EPA. If one is trying to make a case against smoking, the EPA risk assessment is certainly valuable ammunition.

In light of this example, think more broadly about future EPA risk assessments of electromagnetic fields, video display terminals, styrene, formaldehyde, carbon dioxide emissions, and so forth. As matters stand now, the White House and the nation are very vulnerable to EPA (or other agency) risk assessments that are not based on sound science or do not adequately convey the degree of uncertainty in the science. Given the strong scientific and policy implications of this kind of report, it is one that I believe that OSTP should have an interest in. Note also that OMB and the Council on Competitiveness are not necessarily the units in the White House best equipped to consider the science-policy issues raised by such a report. A small yet well-qualified group of risk assessors in the White House could make an enormous difference on these issues, particularly if they established credibility among

agency risk assessors.

I hope this memorandum has provided you a concrete example of the need for strong White House authority and expertise in the field of risk analysis. Good luck in your work!

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