

Improved usage techniques have been developed as well as substitute materials which can be used for many pest control problems.

Experimentation and observation will be required perhaps indefinitely to condemn or exonerate specific pollutants suspected of causing chronic harm, if there are no indications of short-term hazards. The principal question rests in how many years or generations must pass before we will be convinced that a particular contaminant is not injurious. In addition, new materials are constantly being introduced into the environment which will require similar vigilance. In view of these facts, it is impossible to estimate with any certainty either the time span or cost required to be positively certain of the concentration levels which will not adversely affect our environment. However, large volumes of information are being accumulated and, when a significant body of information is available, informed judgments are made and standards established with a considerable margin of safety. As additional information is accumulated, standards may be lowered or raised.

Our alternative is to wait until experimentation convinces us beyond a doubt that no harmful effects to the environment will result from the introduction of a new factor into it. As mentioned previously this may require generations to demonstrate. The net effort would be a moratorium on the application of science and technology.

Question 17. What role does OST play in assessing the economic considerations inherent in setting air and water criteria or standards such as the cost of compliance versus the overall benefit, and the effect it will have on the competitive position of various industries within the economy and the total scheme of things? IF OST does not do it, whose responsibility is it?

Answer. Section 305(a) of the Clean Air Act as amended assigns responsibility for economic studies of air pollution to the Secretary of the Department of Health, Education, and Welfare.

"In order to provide the basis for evaluating programs authorized by this Act and the development of new programs and to furnish the Congress with the information necessary for authorization of appropriations by fiscal years beginning after June 30, 1969, the Secretary, in cooperation with state, interstate, and local air pollution control agencies, shall make a detailed estimate of the cost of carrying out the provisions of this Act; a comprehensive study of the cost of program implementation by affected units of government; and a comprehensive study of the economic impact of air quality standards on the Nation's industries, communities, and other contributing sources of pollution, including an analysis of the national requirements for and the cost of controlling emissions to attain such standards of air quality as may be established pursuant to this Act or applicable State law."

Sections 16(a) and 18 of the Federal Water Pollution Control Act as amended vests similar authority in the Secretary of the Interior.

Section 16(a): In order to provide the basis for evaluating programs authorized by this Act, the development of new programs, and to furnish the Congress with the information necessary for authorization of appropriations for fiscal years beginning after June 30, 1968, the Secretary, in cooperation with State water pollution control agencies and other water pollution control planning agencies, shall make a detailed estimate of the cost of carrying out the provisions of this Act; a comprehensive study of the economic impact on affected units of government of the cost of installation of treatment of facilities; and a comprehensive analysis of the national requirements for and the cost of treating municipal, industrial, and other effluent to attain such water quality standards as established pursuant to this Act or applicable state law. . . .

Section 18: The Secretary of the Interior shall conduct a full and complete investigation and study of methods for providing incentives designed to assist in the construction of facilities and works by industry designed to reduce or abate water pollution. Such study shall include, but not be limited to, the possible use of tax incentives as well as other methods of financial assistance. In carrying out this study the Secretary shall consult with the Secretary of the Treasury as well as the head of any other appropriate department or agency of the Federal Government.

A coordinating mechanism was established by the President in his memorandum of April 21, 1967, which stated in part:

"The other area requiring attention is the consideration of economic incentives for pollution control and the determination of the economic effects of pollution