

The Federal Government should devote its efforts to setting standards, reviewing the data submitted by the independent testing organization for a product to be marketed, and enforcement. It would fall upon the manufacturer to prove safety and the testing organization to document the proof.

I would like to turn now to what I think is the most essential aspect of the task force report—the environmental protection system. Without it, in my judgment, strategy means nothing.

The strategy we recommended was very simple. It was to isolate the environmental insult by degree of severity and attack it with an evolving technology.

To do this, the system is mandatory. The system was obvious once we looked at the functions being exercised by the environmental health agencies of the Department. These functions were research and development, determination of criteria and standards, enforcement, manpower development, public awareness, and intergovernmental relations.

But these functions were not integrated toward a policy of reaching quantitative goals.

We recommended a system which would first, through a research surveillance program, isolate any and all environmental insults individually or synergistically; identify their source, and their composition; and, second, measure and begin to uncover their effect on human health and welfare.

The data from this program would then pass as developed to the environmental design program, where it would be converted into a range of criteria that would incorporate concern not only for health but the socioeconomic factors as well. With this data, Government or Government authorized agencies would set a dual-level standard. The first level would be the immediate requirement based upon the minimum health needs and technology available. The second level would be the next desirable and accomplishable level.

As a result of these standards, the next program in the system, applied technology, would act to advance the state of the art so technology could provide the higher standard.

Finally, the fourth element of the system, compliance, would insure that applicable standards were being adhered to.

The two fundamental aspects of this system, which must be radically changed from present Department approaches if such a system is to work, are the Department's ability to set criteria and standards and ability to conduct an applied technology program. In fact, disregarding even this proposed system, without radical changes in the Department's ability to handle these two programs, nothing it does in environmental protection will amount to much.

Criteria cannot be developed and applied by a variety of agencies. There must be an integration of information, a central source for what I call biblical material. The criteria issued will provide a basis for setting standards and, unlike religion, if this is to work, there can be only one bible. The basic concern is for health responsibility; for criteria development should be within the Public Health Services.

But neither that agency nor any other, Federal or non-Federal, can today do the job of developing criteria, the way it need to be done. And they will not be able to do this job until it is understood what a