Advising TURA: Personal Reflections

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Early years of the TURA Board

- Appointed to serve from 1990-1994
  - Supported the TURA Act while at DPH
  - Opportunity for cancer prevention in Mass.
- Advised Administrative Council on policy development, reviewed program operation
- Enthusiasm somewhat tempered by political climate under Gov. Weld

TURI Science Advisory Board

- Served as member and Chair during 1994 - 2003
- Considered delisting petitions, criteria used for listing, potential “high hazard” list, etc.
  - Received program updates and data reporting summaries (asthmagens, carcinogens, etc.)
  - Reviewed other States and Federal guidance
- Major discussions around some delisting applications

Two illustrative disputes

- Delisting of sodium hypochlorite requested on behalf of Clorox®
  - Written petition claimed “safe lifecycle”
  - Scientist flown from Midwest to Boston hearing
- Delisting of benzyl butyl phthalate
  - Vice-Chair (George Gray) claimed not hazardous
  - rejected eScreen evidence

Science and Policy

- Inherited toxic chemical “lists” from earlier sources (CERCLA, EPCRA, etc.)
- Implicitly used “reactionary principle” to evaluate evidence (D Kriebel, OEM 64:573-574, Sept. 2007)
  - Incontrovertible proof of harm before action
  - Burden on public or government
  - Not considering health and environmental impacts
  - Discouraging public participation

Alternative approach

- Take preventive action in face of uncertainty
- Shift burden of proof to proponents
- Explore wide range of alternatives
- Increase public participation in decision-making

Science for sustainable solutions

- Move away from “is there strong evidence of harm” to “do we need this in the first place?”
- Move away from documenting the problem toward envisioning the solutions
- Broaden, rather than narrow, the scope of concern and inquiry

Solutions, continued

- Develop principles of “plausibly safer” materials or practices
  - Seek biocompatible, biodegradable or renewable solutions
  - Make sure alternatives show less evidence of harm
  - Continue surveillance and remain flexible to future improvements