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Risk In A Free Society: A Reply From EPA Professionals

EPA Administrator William Ruckelshaus wrote an article recently for the journal, Risk Analysis. Entitled, Risk in a Free Society, the article gives the views of a prominent political practitioner in the field of risk control. We career professionals at EPA think it would enlighten the discussion if we inject our point of view.

In many ways the career professionals' perspectives on assessing, managing and communicating risks are similar to those of Mr. Ruckelshaus, but in other ways our perspectives are profoundly different from those of this Administration.

Let's consider some points raised in the Ruckelshaus article. To begin with, he says that his chief task on returning to EPA in 1983 was restoring public confidence in an Agency perceived by the public to have perverted its risk reduction mission for "crass political gain." He then notes that whether the perception of perversion was true or not "is almost beside the point." (Emphasis added) As will be made plain below, we EPA professionals don't think the truth of that perception was beside the point at all---it is the heart of the matter.

Mr. Ruckelshaus goes on to describe four ways by which the Agency can communicate with the public more effectively about risk: 1) Express risk as a range of possible consequences, rather than as a "magic number"; 2) make known the assumptions--including value judgements--used in our risk analyses; 3) demonstrate that risk reduction, not "narrow cost-benefit considerations", is EPA's main concern; and 4) understand that some things, such as this generation's obligations to past and future generations, are unquantifiable.

The crux of Mr. Ruckelshaus' argument appears in the last paragraph. "--I think we must do better in showing how different values lead rationally to different policy outcomes." And here's the rub, for this statement springs the drapdoor on our hopes for future leadership that will conscientiously enforce the laws EPA administers.

Here's why.

According to Mr. Ruckelshaus, "People will fight like fury to keep a hazardous waste facility out of their neighborhood, despite expert assurances that it is safe---." The experience of EPA professionals who have been in these communities shows that--contrary to the beliefs of some industrial and governmental "experts"--these people fight like fury not because they are ignorant boobs terrified of technology and unable to understand risk. They fight because they've seen how "different values lead rationally to different policy outcomes"--at Love Canal, with asbestos use or with Kepone-poisoned workers. In plain words, they worry that there will be a politically expedient shift to "different values" in Washington or the state capital if such a site is opened, leaving them stranded

with a hazardous waste site in their midst and a government with no money or no will to police its operation.

Not only do we have to do a better job in communicating to the public how decisions on risk are reached, we must assure the public that as political winds swirl, shift and die, politicians' "different values" will not leave society's risk control operations dead in the water infavor of " narrow cost-benefit considerations."

Which brings us to the present situation at EPA, where the winds are not only shifting again, but beginning to blow cold. Many EPA professionals think we'll have a more Anne Burford-like Administrator as early as January, should the electorate so decide. It's an open secret that hiring will stop the day after the election, and it's rumored that a 10-20 percent reduction in funding for EPA is on tap for 1986. It looks to us very much like those "different values" are about to rationally lead to a policy outcome of turning back the clock at EPA, and we're worried.

We're worried, as professionals, about our ability to do the kind of job of health and environmental protection that the public expects of us if the Agency is ravaged again as it was in 1981-82. During that time political appointees put enormous pressure on EPA' civil service to change professional scientific and legal analyses so as to justify policy outcomes in conformity with the politicians' values. Being realists, EPA professionals knew that those policy outcomes--but not the underlying professional analyses--were the politicians' to ordain. So in order to protect the integrity of the civil service against such abuses, EPA professionals organized.

The public is entitled to see the danger to EPA and its mission as clearly as we who work here do.

So if Mr. Ruckelshaus' article is a brief for a better, more conscientious enlightenment of the public about the way EPA handles risk, this Agency's professionals firmly endorse it. But if the article is a set-up to justify more abuse of EPA's health protection process for crass political gain, we urge the public to read between the lines.

The Executive Board, Local 2050
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