

February 13, 2014

John Howard, MD, Director  
National Institute for Occupational Safety and Health  
395 E Street S.W. Suite 9200  
Patriots Plaza Building  
Washington, DC 20201

Dear Dr. Howard:

The 42 groups listed below thank the National Institute for Occupational Safety and Health (NIOSH) for modernizing their carcinogens policy. We welcome this opportunity to comment on the draft document, "Update of NIOSH Carcinogen Classification and Target Risk Level Policy for Chemical Hazards in the Workplace." The world of work has changed dramatically since 1978 and NIOSH's updated policy should be designed to promote the most effective means of preventing cancer among workers.

We support NIOSH's proposal to use the classifications issued by the National Toxicology Program (NTP), the Environmental Protection Agency (EPA), and the International Agency for Research on Cancer (IARC) because it will allow the agency to more efficiently focus its efforts on cancer prevention rather than on the performance of separate classification processes. We also support NIOSH's decision to use the classification from any of the three organizations that will provide the most health protection for impacted workers.

But we cannot support a NIOSH "Recommended Exposure Limit" (REL) for workers of 1 in 1000—a thousand times less protective than the levels considered safe for the general public. We believe that "recommending" levels of exposure that are not based on providing the highest level of protection for workers' health undermines NIOSH's mission and goals.

To provide the Occupational Safety and Health Agency (OSHA) with the information needed to set Permissible Exposure Levels, NIOSH can perform calculations that set out a range of lifetime risks of cancer (e.g., one in 1,000, one in 10,000, and one in a million, etc.) without labeling this activity as setting RELs.

Lastly, we believe that NIOSH's new reviews of occupational carcinogens should provide information on how to eliminate the use of known carcinogens and move to safer alternatives. Information on how to move up the hierarchy of controls deserves more attention in NIOSH's carcinogen policy because it is a more effective means of preventing cancer among workers.

Again, thank you for this policy reform and for the opportunity to comment. And thank you for the work you do every day to protect the health and safety of workers across the United States.

Yours truly,

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