

Diana, Sherri A. (CDC/NIOSH/EID) (CTR)

From: Christine Sohn <csohn@hcwh.org>
Sent: Thursday, December 22, 2011 11:10 AM
To: NIOSH Docket Office (CDC)
Cc: cbrody@bluegreenalliance.org; mjacobs@envhealth.net
Subject: Comments on Docket 240
Attachments: NIOSH letter.doc

Dear Dr. Howard:

Health Care Without Harm is an international coalition of hospitals and health care systems, medical professionals, community groups, health-affected constituencies, labor unions, environmental and environmental health organizations and religious groups. We are submitting the attached comments on Docket 240 because we believe that NIOSH is creating an opportunity to reduce the American people's exposures to carcinogens.

Sincerely,
Christine Sohn on behalf of Gary Cohen

Christine Sohn . **Executive Assistant** . **Health Care Without Harm**
41 Oakview Terrace . Jamaica Plain, MA 02130 USA . www.noharm.org
csohn@hcwh.org
617-524-6018 p
617-524-7021 f







the campaign for
environmentally responsible
health care

Without Harm

41 OAKVIEW TERRACE
BOSTON, MA 02130
T: 617-524-6018
F: 617-524-7021
EMAIL: GCOHEN@IGC.ORG
WWW.NOHARM.ORG

December 30, 2011

John Howard, Director
National Institute for Occupational Safety and Health
Centers for Disease Control and Prevention
NIOSH Docket Office
Robert A. Taft Laboratories
4676 Columbia Parkway, MS-C34
Cincinnati, Ohio 45226

Submitted by e-mail to: nioshdocket@cdc.gov.

RE: Docket Number NIOSH-240
Request for Information: Announcement of Carcinogen and
Recommended Exposure Limit (REL) Policy Assessment,

Dear Dr. Howard:

Health Care Without Harm is an international coalition of hospitals and health care systems, medical professionals, community groups, health-affected constituencies, labor unions, environmental and environmental health organizations and religious groups. Our mission is to transform the health care sector worldwide, without compromising patient safety or care, so that it is ecologically sustainable and no longer a source of harm to public health and the environment. We are submitting these comments on Docket 240 because we believe that NIOSH is creating an opportunity to reduce the American people's exposures to carcinogens. If NIOSH is successful, the outcome will be a health care system that uses fewer carcinogens in products and practices, lowers the exposures of its workers to cancer-causing agents, provides better information on carcinogens for diagnosticians and sees fewer patients with cancer.

In answer to the first question in Docket 240's Request for Information, Health Care Without Harm strongly supports the development of a new, explicit carcinogen policy that is based on the best available science and can be regularly updated as the science progresses. We also support the development of policies to protect workers from the other diseases and conditions, including reproductive harm and neurotoxicity.

In response to the second question, Health Care Without Harm urges NIOSH to harmonize its carcinogen classification system with IARC, NTP, Prop 65 and other authoritative bodies. NIOSH's existing use of separate criteria impedes the prevention and the diagnosis of occupationally linked disease. Physicians, nurse practitioners and other health care professionals need commonly used and easy to understand descriptions of the strength of the science on the carcinogenicity of any substance. As an international organization, we would most strongly support the nomenclature in The Globally Harmonized System of Classifying and Labeling Chemicals (GHS); known human carcinogen; presumed human carcinogen; and suspected carcinogen.

In response to questions 3, 4 and 5, we would encourage NIOSH to fully recognize its role as a health agency. Unlike OSHA, NIOSH is not required to balance health concerns with cost and feasibility. When the science warns that no level of exposure to a carcinogen is safe, NIOSH has an obligation to transmit that warning to American workers and their medical providers. RELs and action levels that do not accurately represent the potential health harm endanger workers and impede our capacity to make the changes necessary to create a more environmentally sustainable and healthier future.

Thank you for this opportunity to participate in this potentially important effort to improve the health of American workers and their environment.

Sincerely,

Gary Cohen

President and Co-Founder