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Dear Joshua:

A friend of mine, Odom Fanning, a civil servant in the Department of Transportation, sent me a page from the May issue of CMA's newsletter devoted to the speech you made in February at the World Environment Center. He knew I would be interested in anything concerning you. I am also negatively interested, so to speak, in anything the C.M.A. has to say because they have an unblemished record of faithfully representing the most backward firms among their membership and, hence, of skillfully opposing measures intended to offer environmental protection to workers and the public at large.

I believe you sent me a version of your February speech when I was still with E.P.A., although I do not recall that it contained all of the portions excerpted by the C.M.A. Let me get directly to the point. I think

you overstated a point and played into their hands by saying that "... the one or two or three hundred millions of dollars a year that were now spending on routine animal tests are almost all worthless from the point of view of ~~normal testing~~ standard setting." What is now being spent is much more useful than the zero knowledge that we would have without it. American corporations have never been forbidden from financing more comprehensive research and have taken precious little interest in doing so. They are content to let the government try to do the research with tax monies while they sitonthe sidelines and carp. They spend money freely in propaganda campaigns trying to convince the public that research on mice means nothing to men — and it's a lie. They have come close to convincing virtually everyone that anything administered in high

enough doses to animals will cause cancer — and that is also a lie.

I hope that the Chemical Industry Institute for Toxicology thrives and produces the more precise information that most of us would love to have. In the meantime, I'll ~~still~~ stick with the Delaney amendment for F.D.A. and any authorities currently remaining in environmental laws implemented by E.P.A. and other agencies.

My own experience suggests that corporations, like government bureaucracies, offer no reliable incentive to workers who may be willing to think thirty, twenty, or even five years into the future.

The spoils system becomes stronger in Washington ~~which~~ with each month that passes — from Nixon, thru Carter, to Reagan. There are still too many Don Kendall's in the corporate world who think only about this year's

profit-and-loss ledger. They are not evil men, necessarily, but the institutions they represent — whether public or private — offer no incentive for truly foresighted thinking about environmental problems. I sincerely hope that the new institute for toxicology marks a significant new departure. As long as you remain on the board I will be optimistic about the eventual outcome.

I know that you know that my comments are not offered from the wisdom of a barefoot ecologist, that in my work as a bureaucrat, I have tried to steer a rational course between the idiocies of the left and the right. I am still trying to do so, as I believe you will note from the enclosed talk, my first as a private citizen.

May I have the full text of your talk? You have my best wishes and warmest regards.

As always,

Tom