IN RECOMMENDING the strict regulation and gradual phasing-out of DDT, Health, Education and Welfare Secretary Robert H. Finch has made a difficult, but I believe correct, choice among several options. Our environment is already heavily contaminated with DDT. Human exposure to it will scarcely be affected by a restricted level of continued use for a few years. Meanwhile, we will seek formulas for health-related applications whose benefits might outweigh the risks. We should also fix standards for foodstuffs to eliminate those which are so heavily contaminated that they add an unreasonable burden to their consumers.

We might also ponder whether to look for those people who have the heaviest DDT loads and investigate the worth of medically supervised treatments to wash out the pesticide residues that now average more than 10 parts per million in human fat tissue. These measures may be more drastic than the harmful effects of DDT would justify.

The DDT and cyclamate episodes should move us to hard thinking about preventing similar ones before they have gone so far. We probably should concentrate on pollutants that are the most widely spread, emanate from a limited number of sources and tend to accumulate chronically within the body.

These criteria are almost a definition of the lead from auto exhausts. The mere fact that lead is accumulating in human bones is enough reason to ban the use of lead additives in gasoline before we discover the full magnitude of its impact on human health.

We also need new approaches to the testing of environmental additives, be they related to drugs, food, pest control or fuel. Existing procedures place the full responsibility (if any) on the industrial sponsor of a product. A government bureau then has to police the "proofs" of safety—within a rigid framework of bureaucratic regulations. The evidence is rarely accessible to general scientific criticism. The system is also heavily burdened by pressures of self-interest, which repel creative investigators. Only after a product has been certified and marketed is it likely to receive aggressive, independent criticism. This is unfair even to the manufacturer, who has committed his reputation to a product before it can be properly tested, not to mention the public interest.

SEN. GAYLORD NELSON has proposed a big step in the right direction in his bill for a national drug testing center, an idea that could readily be extended to other additives. This would be supervised by the Food and Drug Administration but testing could be subcontracted to other institutions. The costs would be paid by the sponsors of the drugs. The bill could be improved by incorporating incentive features, for example, a standard fee related to population exposure rather than the cost of testing. And the sponsor should get a rebate if his product was found harmless; pay a penalty if the testing center discovered a hazard before the sponsor did.

We could then exploit some of the inherent advantages of free competition, which are a drag on the present system. The cost of adequate testing is inevitably a burden on innovation, and when it pushes a sponsor into prematurely marketing a product, it may do public harm.

We ought to think of tax incentives and subsidies to the testing center as positive remedies, and penalties for carelessness as negative ones. Finally, we ought not to give the purveyors of products "generally accepted as safe" an unfair advantage when these have not been fully tested.