



NAM Public Statement: Dioxin Review Panel

Good morning. My name is Alicia Oman, and I am the Director for Energy & Resources Policy at the National Association of Manufacturers. The NAM is the largest industrial trade association in the U.S. representing over 11,000 small, medium and large manufacturers in all 50 states. The NAM is the leading voice for the manufacturing economy in Washington, DC, which provides millions of high wage jobs in the U.S. and generates more than \$1.6 trillion in GDP. In addition, two-thirds of our members are small businesses, which serve as the engine for job growth.

EPA's *Reanalysis of Key Issues Related to Dioxin Toxicity and Response to NAS Comments* is of concern to our members, and we are pleased to offer the following comments.

Manufacturers are attempting to fully recover from the steepest economic downturn since the 1930s and bring back the 2.2 million high-wage jobs lost during the previous recession. At the same time,

our member companies are confronting an avalanche of additional rules and regulations from the EPA including the reconsideration of the 2008 “Ozone NAAQS,” the reconsideration of the 2007 “PM NAAQS,” the proposal to regulate coal ash, and the imposition of first-time federal regulations on greenhouse gas emissions.

Manufacturers believe that environmental laws and regulations should not be based on criteria resulting in costly measures that provide little environmental or human health benefit. Scientific assessments should include the application of: scientifically sound risk analysis; risk-based prioritization; benefit-cost analysis; flexible, efficient, cost-effective risk management; and public participation in all phases of the process.

Due to effective regulation and voluntary industry environmental stewardship, the levels of dioxins found in the air, water, soil and our food, have greatly declined. In fact, dioxin emissions from municipal incinerators have declined more than 99 percent from 1987, and according to the EPA’s own analysis, U.S. dioxin emissions from man-made sources have declined by more than 92 percent since 1987.

Manufacturers believe that EPA must use the latest and best science rather than its outdated risk assumptions to be accurate and fair to everyone whose lives or livelihoods will be affected by additional dioxin regulations.

The Preliminary Reduction Goals proposed for dioxin levels in soil would force many municipalities to dig up large tracts of land – even areas that have already been cleaned up to levels approved by the U.S. government with enormous costs and serious implications for businesses, homeowners and farmers. With so many other challenges to putting people back to work in this country, the chilling effect on economic redevelopment would be enormous.

Furthermore, the agency has not offered a funding solution, nor even attempted to calculate the cost, leaving serious questions about how cleanups would be funded, and how and where the soil would be relocated.

Manufacturers strongly urge the EPA to listen to the experts, adhere to the best available science, and uphold its commitment to scientific integrity, transparency, and open government to make sure it gets it right with dioxin regulation. Thank you for your attention.