

December 1, 1976

Dr. Philip Handler
President
National Academy of Sciences
2101 Constitution Avenue
Washington, D.C. 20418

Dear Phil,

This may or may not overlap a phone call that I am trying to get to you, but I just wanted very quickly to be sure that the Academy was tooling up for what promises to be a very complex and pervasive issue: namely the Toxic Substances Control Act. I have not followed the legislative history of this but I am sure that you must have played some part in it during the last several years.

Now it comes time for implementation and my reading of the act tells me that it is one of the most complex and ramifying pieces of legislation that the Congress has passed in many years. The administrator of EPA is under the gun to produce some regulations very quickly - for example in the roster of "old chemical substances", and I doubt that anybody has really given very much thought to how complex the entire enterprise is going to be. Besides its impact on the chemicals industry per se, I am sure you are way ahead of me in foreseeing the ways in which its administrative implementation are going to impact the further conduct of chemical and indeed all scientific research. I had not heard (nor by the way had Dave Goslin whom I saw yesterday) of any specific Academy response to this, and I am afraid that there is going to be a very short deadline between the time that a requirement is recognized and some regulations begin to be cast in concrete. There are, of course, many industry groups who are taking an active role in this, but I think that research science - as well as the national interest - require the particular perspectives of the Academy.

I am still in the middle of reading and trying to understand the details of the act, but if you have any doubt at all what I am driving at, I would be glad to discuss it further with you over the telephone. This is not to say that I expect to play a very active role in the further development of the Academy's position for which I am sure you could find many very effective nominees.

Sincerely yours,

Joshua Lederberg
Professor of Genetics

JL/rr