

# Testimony Of G.R. Greenwell M.D.

## To The Committee On Agriculture On Feb. 7, 1984

The present conflicts that exist relating to EDB are examples of what can happen when our legislative bodies have allowed bureaucracies to develop into a form of dictatorship. Your predecessors apparently have either decided not to accept the responsibility of carrying out the mandates of our Bill of Rights, or they have been convinced by the "experts" that our legislators are too stupid to ever be able to have these matters explained so that they could understand.

Many bureaucracies in the U.S. have been established and allowed to evolve into dictatorship types of government agencies. Proper checks and balances have not been incorporated in the statutes which establish some of these governmental agencies. Therefore they begin to function as a dictatorship in that they;

1. Enact regulations without being required to justify their actions prior to enforcing the regulations (for example one of our bureaucracies recently pro-

claimed that water with more EDB than .1 ppb increases the risk of the consumers developing cancer to a dangerous level).

2. Immediately were allowed to embark on enforcing this regulation (law) without being required to explain why this magic number is valid. They have not been required to develop these regulations "in the sunshine" or have them evaluated by our legislators and, or, consultants appointed by our legislators so that we can be more sure that such a regulation, or "law", is just and is in accordance with our Bill of Rights in that it is needed to assist us in our pursuit of freedom and happiness. No factual data has been made available to any of us that any emergency exists.

How many "swine flu epidemic" type of so called catastrophes must you allow to take place before you feel you should require these bureaucracies to follow democratic processes and the mandates of the Bill of Rights? They have been permitted to assume that their responsibility only requires them to be concerned with some of us possibly harming others. If this assumption is valid they should be developing regulations that would prevent you from operating an automobile because you could possibly harm other people. Their interpretation of their responsibilities have been allowed to govern their conduct without them establishing the validity of this interpretation. (similar to the conduct of a dictator)

In June 1981 the Florida legislature inacted a law that demonstrates their disapproval of the F.D.A. operation since they felt that the F.D.A. was unnecessarily preventing products from being made available to the people of Florida as rapidly as they should. This statute (500.16?) established a Florida F.D.A. type of government agency, but that law like most other laws establishing these types of agencies, failed to incorporate anything which would prevent the Florida Agency from becoming similar to the F.D.A. These laws establishing government bureaucracies usually fail to require these bureaucrats to be adequately accountable for their actions. Therefore they become dictatorships that can become capable of causing a great deal of hardship without providing significant benefits to the people.

Apparently the Florida Department of Health & Rehabilitative Services and EPA etc., have been allowed to assume that their responsibility is to prevent suffering, illnesses and injuries etc., without due concern for protecting our rights under the Bill of Rights and Constitution. Particularly our right to freedom and pursuit of happiness. They should not be allowed to interfere with our freedom unless they can prove we are causing hardship or interfering with others in their pursuit of freedom

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and happiness. For example, these agencies have not been required to produce factual or scientific information which would verify that there is a widespread emergency situation related to the January 1983 recommended uses and application of EDB, nor have they been required to place this evidence (if it exists) before a scientific or legislative body for validating their conclusions before causing a great deal of expense and mental anguish to many people.

No evidence has been published that verifies that EDB exposure (as much as 40 yrs.) has contributed to the development of cancer in any human. The extent of risk to humans is based on unscientific assumptions which are inconsistent with demonstrated facts.

Our state agencies have proclaimed (without producing valid evidence) that EDB in drinking water at concentrations greater than 0.1 ppb significantly increases the risk of developing cancer due to its lifetime cumulative effect. If a person consumes 2 liters (approx. 2 qts.) of water per day containing that concentration of EDB he will consume 51.1 mgm in 70 years. This would be 0.852 mgm/kg. body weight during the lifetime. The National Institute of Occupational Safety and Health stated that no lifetime dose of EDB less than 686 mgm/kg has ever been shown to produce adverse effects in experimental animals. The Florida H.R.S. Department is claiming that the maximum safe lifetime consumption for a human (who has not been shown to be more susceptible to developing

cancer from such exposure than the mice and rats used in the studies producing cancer) is .12% of the dose that fails to produce cancer or any other adverse effect. Black pepper has been shown to produce cancer in mice at a dose equal to the amount the average person consumes in 20 years. If the EPA assumption is correct over 30% of the people in U.S. should have cancer in 20 years time of average pepper consumption.

If you allowed the maximum acceptable concentration of EDB in drinking water to be 100 parts per billion the person who drinks 2 liters per day (which is considered acceptable intake) would require over 563 years to consume an amount of EDB "below which no adverse effect were produced in experimental animals".

I have tried to obtain reports of the information which the State Department of Health & Rehabilitative Services said was supposed to verify that this regulation is immediately needed. Dr. Stephen King, who determined this magic number and assessed the danger, has been unavailable on the occasions I have tried to contact him, therefore, I was referred to Dr. Atkeson, his assistant. Dr. Atkeson told me that the information upon which Dr. King bases his decision was contained in the EDB Position Document 4 of the U.S. E.P.A. (he also told me that he would send me a copy of this information right away), approximately 2 weeks later, on November 31, 1983, I met Dr. Atkeson at a public meeting in Brandon and I had a copy of Position Document 4 and he asked me where I acquired my copy since he had been unable to obtain one prior to then. (Did they get the basis for the decision to start mass hysteria and begin spending thousands of dollars from a document they haven't seen?)

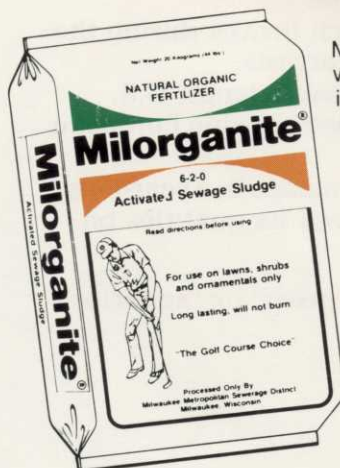
That EDB Position Document 4 developed by the U.S. E.P.A. and published September 27, 1983, which was purported to contain information validating the Florida standards was developed by following very unscientific and questionable procedures. The E.P.A. announced certain suppositions. After the rebuttals were received the E.P.A. rejected the information in many of the rebuttals and arrived at their conclusions without further outside scrutiny. This is like me setting up a debate with Rep. Martin and after each of us presents our arguments Rep. Martin decides who won the debate, without him being required to justify his decision to an impartial observer. Therefore the scientific validity of the conclusions reached in the document has not been verified. You should enact legislation that requires a review of these agency decisions and opinion of a qualified (group or individual) impartial observer.

No method of determining the potential risk of cancer development being brought about by animals or humans through exposure has been verified to be reliable by the scientific community. The formula presented in Document 4 is based more on assumptions than demonstrated facts. No reports of studies (on animals or humans) have been reported that verify we can predict cancer development rates by exposing a group of animals to a specific dose of carcinogen for a lifetime or a specific period of time.

Evidence that the assumptions used by the E.P.A. for developing their conclusions in these matters are invalid

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is far greater than the amount of data indicating possible validity. For example cancer has been produced in mice by exposing them to a mushroom extract (derived from the most common commercial mushroom) at a dose of 1.34 mgm/kg. A one oz. serving of mushrooms would provide a dose of 1.84 mgm/kg to a 170 lb. man. This is 137% of the cancer producing dose in mice. Many humans consume more of this "cancer producing" mushroom than 1.34 mgm/kg on many occasions, yet no human cancer has been related to consumption of this common variety of mushrooms. A derivative of this carcinogen has been shown to produce cancer in 30% of mice which were administered a single dose of 400 mgm/kg. (The animals that developed cancer due to EDB received more than 686 mgm/kg). Therefore if we permit ourselves to apply the same risk calculation formula used by the EPA for calculating the cancer risk involved with a man eating one ounce of mushrooms more than 30% of those involved would develop cancer. If you believe that indicates their formula or risk assessment is correct I would like to meet with you after this hearing and sell you a bridge.

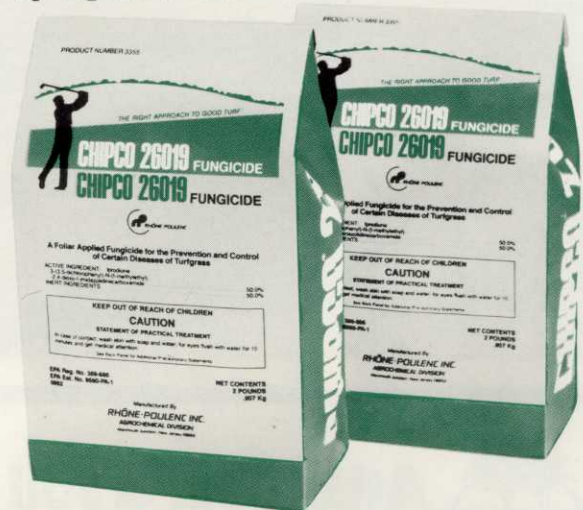
The Board of Toxicology and Environmental Health Hazards Assembly of Life Sciences National Research Council in 1980, estimated that trihalomethanes in water and EDB in water estimates of risks are extremely crude. The results of the studies presented did not establish that these agents cause cancer, but an exposure to them may be statistically related. They concluded at that time (based on these "extremely crude" formulas) 10 parts per million of EDB water may increase the cancer risk by 2 chances out of 100,000 during a 70 year life. The American Cancer Society estimates that 25 out of 1000 people will develop cancer without EDB exposure.

In conclusion, I suggest that you should not allow the bureaucrats to enforce a regulation of the use of EDB more strict than January 1983, until after they have demonstrated that their evidence of danger will be considered valid by disinterested scientific observers designated by you. The maximum limit of EDB in drinking water I would recommend in the interim would be the same as recommended by the expert interviewed Friday, January 27, 1983, on educational television show "McNeil-Leher Report", Mr. Havender, which was 100 parts per billion, the same level I suggested November 21, 1983. Also, someone or some qualified group should be charged with the responsibility of developing a cancer risk formula and verifying the validity, at least in animal studies, before applying it to humans and threatening severe hardships and economic impact without first of all verifying to you and, or the scientific community that an emergency exists.

Most importantly this controversy should cause you to realize the need for legislation that will require the various government agencies to justify their actions before they are allowed to cause us to incur significant hardships and or expenses (interfere with our rights of the pursuit of happiness and freedom). The democratic system should extend down from the highest to the lowest level of government. Don't allow anyone to convince you that these matters are too complicated for anyone to provide you with an understandable explanation, so they can develop a type of dictatorship which is accountable to nobody.■

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