

RISK: Health, Safety & Environment (1990-2002)

Volume 3
Number 2 *RISK: Issues in Health & Safety*

Article 6

March 1992

Book Review

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Todd F. Volyn, *Book Review*, 3 RISK 175 (1992).

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Book Review

Erratum

The citation for this review is *3 RISK 173 (1992)* in most commercial databases.

CONRAD G. BRUNK, LAWRENCE HAWORTH & BRENDA LEE, VALUE ASSUMPTIONS IN RISK ASSESSMENT: A CASE STUDY OF THE ALACHLOR CONTROVERSY. (Wilfred Laurier University Press 1991) [161 pp.] Glossary, notes. C91-094453-9; ISBN: 0-88920-200-1. [Cloth \$US 35.00. Waterloo, Ontario, Canada N2L 3C5.]

In 1984, the Canadian Minister of Agriculture cancelled Monsanto's registration of the herbicide, Alachlor. An appeal to a Review Board resulted in a recommendation to the Minister for the reinstatement of registration. Yet it went unheeded, and Alachlor remains unavailable in Canada to this day. Brunk, Haworth and Lee examine the process leading to the Board's recommendation and ask fundamental questions regarding its risk assessment. They conclude that, despite predominance of scientists on the Board and characterization of the process as "scientific," the assessment heavily reflects value judgments of its members.

Readers of *RISK* should be most interested in the authors' efforts to peel open the classic risk-assessment model and show how such an inquiry lends itself to an infusion of values. "What is at stake in this debate," they say, "are conflicts among fundamental social and moral values, which cannot be resolved by scientific inquiry alone." For example, they cite the Review Board's pervasive allusions to its belief that the manufacturer of the sole competitive product would be left with a monopoly and the effect this belief had on its recommendation.

Further, the authors argue that a vision of technology as the indispensable problem-solver predisposed Board members to select some and ignore other factors for their risk-benefit analysis. Thus, economic gain from improved crop yields was chosen as the benefit to be weighed against farmhand exposure to a potential carcinogen as the risk. Other potential considerations, such as the risk of well-water contamination were not considered, and the authors believe that this could have been expected from an inquiry conducted only by scientists.

The selection of factors for analysis and their ultimate weighing necessarily turn on values for which the classic risk-assessment model is ill-suited, warns VALUE ASSUMPTIONS.

The book is not without its shortcomings. Perhaps the most serious is its failure to discuss the Pest Control Products Act of 1969 in more than two small paragraphs. The book itself is quite value-laden in its criticism of the Board's process, and lack of attention to the Board's charter leaves one unsure that its process was other than one the legislature dictated. If so, criticism of the Board is misdirected.

"Allow me to frame the issues, and I will control the outcome" is a proposition the truth of which most lawyers quickly realize. In showing how fundamental political, social and moral choices frame and dictate the outcome of a seemingly value neutral process, Brunk, Haworth and Lee make a strong case for wider recognition of the importance of issue framing by scientists — particularly in situations where scientific knowledge is being used to evaluate and manage risk.

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