Once in a while a really important new idea comes along -- or an old idea gets applied in important new ways. Mary O'Brien's proposal for "alternatives assessment" instead of "risk assessment" fits into this category -- innovative and important. No doubt I'm biased because our organization hired O'Brien so she could find the time to write a book on this subject. The book has just been published by MIT Press.[1] O'Brien's basic idea is astonishingly simple but also delightfully subversive of the status quo. Her idea is that we should all take a CONSUMER REPORTS approach to decision-making. Just as the well-known consumer magazine examines a range of available options before recommending a particular toaster or TV, all decision-makers (public AND private) should examine a full range of options before committing to a new project or new technology. The least-damaging option should be chosen. In other words, we should look before we leap.

O'Brien's approach makes such good sense that you might think all decision-makers would be using it already. But that's not how decisions are made in the industrialized world. Instead of examining a full range of alternatives, decision-makers generally decide what they want to do, then they hire a risk assessor to convince everyone that the damage they are about to do is "acceptable." By the time damage becomes apparent, they're hauling loot to the bank. At that point, stopping them is almost impossible. The cumulative result of this "risk-based decision-making" is a severely degraded and stressed global ecosystem. To put it bluntly, the global ecosystem is being shredded by people who are building roads, filling wetlands, logging forests, damming rivers, vacuuming fish from the oceans, overgrazing grasslands, depleting topsoil, wasting and polluting water, and dumping persistent chlorinated chemicals, toxic metals, greenhouse gases, and nitrogen into the environment on a massive scale. Each of these damaging activities is justified and deemed to be "acceptable" on the basis of a risk assessment.

Sometimes risk assessments are very formal, filling 1000 pages or more with mathematical formulas and technical data. On the other hand, most risk assessments are so informal that you might not even recognize them as risk assessments -- they may consist of a mere sentence or two. Examples: "Silt runoff will be kept within acceptable limits by the use of hay-bale barriers, so our construction project on the edge of the Bay will kill very few fish." Or "Naturally-occurring chemicals in food cause more cancers than this pesticide will cause, so it would be silly and a waste of money to worry about the presence of this pesticide in your cornflakes."

Risk assessment is the most powerful intellectual tool that the poisoners and destroyers of the planet have ever invented. It is their battering ram AND their camouflage. It provides "cover" for just about any damaging activity that anyone might want to undertake. Risk assessment is used to justify exposing workers to toxic chemicals and radiation; to justify clearingcutting and other harmful practices in irreplaceable forests; to justify automobile emissions and the roadkill that it produces; to justify exposure to industrial toxins; to justify exposure to industrial chemicals; to justify exposure to industrial chemicals; and to justify exposure to industrial chemicals.

Risk assessment is used to justify exposing workers to toxic chemicals and radiation; to justify clearingcutting and other harmful practices in irreplaceable forests; to justify automobile emissions and the roadkill that it produces; to justify exposure to industrial toxins; to justify exposure to industrial chemicals; to justify exposure to industrial chemicals; and to justify exposure to industrial chemicals.

Furthermore, risk assessment conveniently never asks, "Is the proposed activity needed?" It never asks, "Is the proposed activity ethical?" It never asks, "What will be the cumulative impact of this activity combined with all the other damaging activities to which humans and non-humans are exposed at this location?" And risk assessment never, ever asks, "Are there less damaging ways to accomplish the same purpose?" On the other hand, all these questions are central to an "alternatives assessment." Thus alternatives assessment is wonderfully subversive because it asks fundamental questions about "business as usual." Risk assessment, on the other hand, simply greases the skids for "business as usual."

Starting about 1975, industrialists hoped that risk assessment would become the permanent key to imposing harmful decisions on an unwilling public -- and for a couple of decades it seemed to be working. Corporate risk assessors -- and a phalanx of third-rate journalists transformed into highly-paid "risk communicators" -- like to dress up in white lab coats and hang stethoscopes around their necks, then accuse their critics of being "irrational" devotees of "bad science." Monsanto, Dow Chemical and other major polluters have spent hundreds of millions of dollars promoting the idea that risk assessment is the very definition of "good science." Harvard University houses a polluter-funded "center" for risk assessment, which pumps out an endless stream of shameless propaganda aimed at convincing the American public that we all need to make more decisions based on risk assessment, because risk-based decisions are "unbiased," "impartial," "neutral," "rational," and based on "sound science."[2] Sound familiar? The NEW YORK TIMES maintains at least one staffer who writes almost nothing but risk-based propaganda, on behalf of polluting industries.[4] In this, he joins a long list of distinguished corporate toadies like John Stossell, Gregg Easterbrook, Elizabeth Whelan, and Michael Fumento.

U.S. Supreme Court justice Stephen Breyer went the next step in his book, BREAKING THE VIOCUS CIRCLE, subtilted, "Toward Effective Risk Regulation."[3] Judge Breyer suggested that we set up a "small centralized administrative group, charged with a rationalizing mission" within the federal government, with the power to impose their risk-based decisions the public, democracy be damned. Like religious fanatics, this risk assessment crowd wants us to believe that they have found the truth and the way -- the only
way. But really all they've found is a new way to justify shredding the biosphere to make money. It's just a one more scam to provide cover for traditional destructive behavior. In her book, Mary O'Brien devotes sections to Why business loves risk assessment, Why government agencies use risk assessment, and Why many scientists live with risk assessment even though they know risk assessment isn't mainly a scientific activity -- it is mainly a political weapon wielded by the powerful to have their way with the rest of us.

O'Brien's book is filled with provocative ideas. For example, our government -- and many others, like the Harvard risk assessors[2] -- recommend "comparative risk assessment" to rank environmental problems from important to unimportant. The rationale is that we don't have enough money to solve all our problems, so we should spend our scarce dollars on the most important. O'Brien challenges that thinking: "It is noteworthy that comparative-risk-assessment processes rank environmental problems. It would be just as logical to rank which behaviors are causing the greatest environmental problems, or who is causing the greatest environmental problems, or which social arrangements allow or encourage people to cause environmental problems. By focusing on environmental problems rather than on problematic behaviors, problematic people, or problematic social arrangements, the comparative-risk-assessment group can pretend that the problems just 'happened' and that no identifiable individuals or businesses caused them." (pg. 121)

O'Brien suggests that, in a democracy, all businesses and government agencies should be required to explore, on paper, and in understandable language, their options for causing the least possible environmental damage. She says, "All potentially environmentally degrading activities, public or private, should be subject to public scrutiny of alternatives. The public deserves to know that those who pollute, extract, consume, emit, incinerate, or abandon are aware of their technological options for minimizing disturbance of the environment."(pg. 122) But of course this won't happen any time soon because, as O'Brien says, "If you wanted to get approval to undertake a particular hazardous activity, would you want people asking big questions about the activity? Would you want people to think that the hazards or the potential risks were unnecessary? Alternatives assessment threatens the status quo. Alternatives assessment can make social change seem both desirable and possible."(pg. 136)

Is risk assessment 100% bad? Not necessarily. In a thorough analysis of a full range of alternatives, risk assessment might play a role. It is risk assessment of only one or a few options that O'Brien wants to eliminate.

Please urge your local library and bookstore to order MAKING BETTER ENVIRONMENTAL DECISIONS from MIT Press.[1] Starting this fall, Mary O'Brien will be available to give a talk, debate a risk assessor, lecture at your local university, or consult with your citizen group or your government, to help discover how "alternatives assessment" can improve decisions in your area of interest. She can be reached by E-mail: mob@darkwing.uoregon.edu.

--Peter Montague (National Writers Union, UAW Local 1981/AFL-CIO)


