empower rural craftsmen and women in the Third World, provide loans that will not enslave (unlike traditional sources), and offer advice about production and esthetic design, as well as efficient marketing of their products.

Americans shopping for clothing were enabled to express their abhorrence of unsafe and sweat home industries by looking for the small sewn-in tab of the Garment Makers’ Union, and when buying stationery those with good near vision could look for the print union logo.

Standards for the quality, performance, and safety of materials and products, set by governments, standard setting bodies, and trade associations, constituted no more than a Tower of Babel, and could be used to obtain an advantage over competitors. Their replacement by international standards for the performance and safety of products does away with earlier sharp practice, so that even the World Trade Organization (WTO), the repository of Adam Smith economics ideology, would not hold standard setting to constitute a barrier to trade. Famously, the WTO even conceded that Europe might ban the import and use of asbestos and asbestos products on health and safety grounds, in the face of a major exporter appealing on the grounds of free trade.

Founded in League of Nations days, as part of making the world fit for heroes to live in, because its member states were not required to abide by its minimalist codes and it was never provided with the facilities to monitor the performances of those countries that were signatory, the influence of the International Labour Organization (ILO) has been seriously limited. If there were a will in the United Nations, the ILO could be revived and provided with the means to implement its basic mandate. The representation of industry and labour on its Board, would, subject to its being given the authority and adequate facilities, create a suitable body for making the value judgements involved in developing marks for identifying ethical products manufactured ethically, and for policing them.

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Letters

Health and Safety Executive Inspection of U.K. Semiconductor Manufacturers

To the Editors—Your article “Health and Safety Executive Inspection of U.K. Semiconductor Manufacturers” revisits criticisms previously made about HSE’s study of spontaneous abortions in this industry. These criticisms have already been refuted in a letter published in your Journal.¹

The recent article by Watterson et al.² continues to misrepresent the Health and Safety Executive’s (HSE’s) commitment to the effective management of risks. Our commitment is strong and constant, demonstrated day after day by our enforcement action and by our investment in world-class science and technological expertise. The facts are as follows.

In December 2001, HSE reported following a study that there was a possibility of a work-related cause of cancer at National Semiconductors (NSUK), Greenock. This study was designed to establish whether there was evidence of an excess of cancer and was done to a rigorous scientific standard. It was overseen by an expert independent scientific committee, and has been published in the peer-reviewed literature.³

What we found was inconclusive but left some cause for concern. We are therefore pursuing further epidemiological investigations, not only at that plant, but also across the semiconductor industry in Great Britain.

We also needed to know the standard of occupational health control in the rest of the British semiconductor industry. That is why HSE carried out a programme of inspections to check current conditions industry wide. This industry-wide investigation, covered a sample of the activities based on the concerns about carcinogens in the industry. This sample approach allowed HSE inspectors to consider the selected issues in depth. It found that there were issues that had to be tackled at a number of plants, and so we took well-judged enforcement action.

Occupational health will be a major priority in our new strategy...
A Strategy for Workplace Health and Safety in Great Britain to 2010 and Beyond" which will be published shortly. We will be focusing on the areas where we are best placed to reduce workplace ill health. Occupational cancer demands to be taken seriously because of the considerable human suffering and distress it causes workers and their families.

HSE is not reducing the number of inspectors. We are developing ways of better targeting the use of inspectors by using trained non-inspector staff. That will allow trained inspectors more time to address more complex issues.

JOHN THOMPSON
Head of HSE's Chemicals, Flammables Policy Division

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2. Watterson A, LaDou J. Health and safety inspection of UK semiconductor manufacturers. Int J Occup Environ Health. 2003;9:292-5.
3. McElvenny DM, Darnton AJ, Hodgson JT, Clarke SD, Elliott RC, Osman J. Investigation of cancer incidence and mortality at a Scottish semiconductor manufacturing facility. Occup Med. 2003;53:419-30.

In reply:—The HSE fails to address our major concerns about the shortcomings of the recent semiconductor plant inspections in the United Kingdom and the extensive complacency of the HSE in dealing with this sector. We do not consider “assertions” of good practice to be evidence of good regulatory practice. We fail to comprehend how the HSE can conclude that semiconductor companies and the UK semiconductor sector as a whole are performing satisfactorily when the HSE report itself observed, for instance, that: “very few companies could demonstrate a strategy for managing occupational health risks to their employees”; “there appeared to be little use of sampling data to inform and support assessments or to demonstrate compliance with OELs”; and “in many cases companies reached conclusions (on chemical exposures) without any evidence of sampling being presented.” (From the HSE Inspection report on GB semiconductor manufacturers 2002)

There seems to be at best a remarkably high degree of complacency demonstrated by the HSE in terms of accepting industry statements about the occupational health and safety practices of the industry without the sound evidence base to support them.

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