



September 20, 2017

Governor Chris Christie
Commission Chair
President's Commission on Combating Drug Addiction and the Opioid Crisis
White House Office of National Drug Control Policy

***AIHA Comments to the President's Commission on Drug Addiction and the Opioid Crisis
On Protecting First Responders and Related Workers from Exposure to Opioids and Synthetic
Analogues***

Dear Governor Christie:

On behalf of the American Industrial Hygiene Association® (AIHA), I write to you on a matter of great urgency: protecting first responders, including law enforcement, DEA agents, and EMTs as well as crime lab analysts and others from exposure to opioids and potent synthetic analogues during the performance of their job responsibilities.

The broader opioid epidemic afflicting our Nation is also placing at risk the workers we all depend upon to help manage the consequences of this crisis and for our own personal safety and security. These workers are often caught unprepared, confronted with hazards on a scale and intensity never before seen. It is clear that they now need our help. In truth, it is nothing less than our obligation to repay the debt we owe to them for the services they provide, which allow us to live in peace of mind and body.

Fentanyl can be absorbed into the body via inhalation, oral exposure or ingestion, or skin contact. First responders can be exposed by these routes when responding to requests for emergency medical treatment. Police officers are also at risk for exposure when confiscating and processing evidence believed to contain illicit drugs or when investigating clandestine drug laboratories. Law enforcement officers are at risk of exposure while executing search warrants, during traffic stops, and while conducting field testing.

The needs of first responders and others are at once simple and complex. They are simple in that the techniques and equipment for protection already exist; they are complex in that there are a great variety of tasks that may cause these professionals to come into contact with opioids and synthetics, through several routes of exposure. As a result, the greatest challenges lie in the development of guidance and practical tools and training that is specific to each person who may be exposed.

To more accurately address the needs of each worker involved, and thus effectively combat the total problem, it is useful to break down the most urgent needs into the following four categories, which constitute AIHA's recommendations on this matter:

- 1) Identify all the workers (including volunteers) who may be exposed and the specific activities that place them at risk for exposure.

- 2) Identify the work practices and personal protective equipment (PPE) that have been successfully adopted by the pharmaceutical and healthcare industries and may have equal application when handling opioids and synthetics by the workers noted above.
- 3) Develop specific practical guidance and training to control exposure.
- 4) Provide targeted and widespread dissemination of the training and guidance to all potentially exposed workers, including through the creation of short, field-useful wallet cards and social media.

AIHA strongly encourages the Commission to address all of these issues in its final report to President Donald J. Trump. We are eager to work with the White House on these urgent matters. Presently, we are working with State legislators and other policymakers to provide assistance to those in the field who daily confront these challenges.

As you contemplate how we might be of service, please keep in mind that AIHA and our members have a reach that extends to millions of people, and we have solid credibility that is built from 78 years of service to the occupational and environmental health and safety community. Specifically, AIHA has 8,500 members who represent a cross-section of industry, private business, labor, government, and academia. We have 68 Local Sections that meet regularly throughout the United States, and more than 50 volunteer groups. We also have formal and informal partnership agreements with governmental and nongovernmental organizations that represent the full spectrum of worker health and safety vocations. In addition, we have several award-winning publications, a strong social media presence and capabilities, and host conferences where thought leaders from a variety of industries gather to share new information and answer practical questions on specialized health and safety topics such as PPE, respiratory protection, and other exposure control methods¹.

We look forward to working with you to help protect the health and safety of all of first responders and the many other workers throughout the Nation whose own efforts in turn keep us healthy and safe. Please feel free to contact Mark Ames, AIHA's Director of Government Relations, at mames@aiha.org or (703) 846-0730.

Sincerely,



Deborah Imel Nelson, PhD, CIH®
President
AIHA

¹ For additional information on AIHA, please visit www.aiha.org.