

August 5, 2003

Richard N. Mott
Vice President for International Policy
WWF-US
1250 24th St. NW
Washington, DC 20037



Dear Richard:

Please accept my apologies for the delay in replying to your most recent letter. You may remember last time we dealt with each other by phone, I was working out of my mother's hospital room. I'm happy to say that she left the hospital and was able to spend the last months of her life with me at my house. I wanted to respond personally to your letter however, instead of having someone else step into the picture. I've given what I want to say a lot of thought after giving the same considerable thought to the content of your letter.

From our perspective, it seems as if WWF refuses to turn its back on animal testing as a strategy for regulating toxic chemicals, perhaps because this is the only strategy it knows. This has become evident both from our discussions as well as from WWF's pushing the regulatory agencies in the United States, Europe and elsewhere to require testing for effects such as "endocrine disruption" and "developmental neurotoxicity," which, as you know, result in a terrible toll on animals.

We are beyond puzzled as to why WWF believes that government regulators who will not ban or severely restrict a chemical that is already well known to be a mutagen or human carcinogen (e.g., atrazine) would be any more responsive to a new "flavor-of-the-month" endpoint such as endocrine disruption. As a case in point, I call your attention to the EPA's treatment of data regarding the supposed "endocrine disrupting" effects of atrazine on amphibians. The EPA's white paper on this subject, released May 29, is based on the examination of 17 studies it deemed relevant and the paper "concluded that the scientific evidence does not support many of the conclusions reached by the various study authors. ... Overall, the weight-of-evidence based on currently available studies does not show that atrazine produces consistent, reproducible effects across the range of exposure concentrations and amphibian species tested. ... The current body of knowledge has deficiencies and uncertainties that limit its usefulness in interpreting potential atrazine effects." This is what U.S. regulators say about atrazine after innumerable animal tests have been conducted and despite the fact that atrazine has been off the market in most western European countries for years because it is considered so toxic! Atrazine still remains the most widely used herbicide in the U.S. and its regulatory story is just one of many examples of the sort of insane dichotomy that causes animals suffering and death without any purpose whatsoever (e.g., the safety of human beings).

Doing the same thing again and again and expecting a different result is the classic definition of insanity. As long as WWF believes that more animal testing is the solution to the atrazine mess—and toxic pollution in general—I must agree that the choice to terminate a formal dialogue was inevitable. Nonetheless, I would like to reiterate my personal appreciation for WWF's recent statements supporting greater funding and prioritization of non-animal test method development and validation, and my hope that despite our lack of formal relations, our organizations can continue to work independently toward what I believe is a shared goal of an environment in which animals are no longer forced to choke on toxic chemicals—either in laboratories or in the wild. We will continue to fight to realize this goal.

Sincerely,

Mary Beth Sweetland
Senior VP & Director
Research & Investigations Department