

April 24, 2000

Dear Senator/Representative:

We are writing in response to criticisms recently voiced by People for the Ethical Treatment of Animals (PETA) of EPA's Endocrine Disruptor Screening and Testing Program (EDSTP). PETA has stated that EPA's screening and testing program "must be stopped." We emphatically disagree.

Animal protection groups like PETA have succeeded in re-emphasizing to all scientists the need for diminishing the impact of testing on the animal kingdom. Our organizations completely support PETA's view that animal testing should be minimized and that the welfare of test animals must be a central concern of testing programs. We oppose all unnecessary animal testing and urge EPA to seek out and use validated alternatives wherever possible. We also encourage EPA to pursue the development and validation of non-animal tests. As members of the EPA advisory committee whose unanimous consensus report is the basis for EPA's program, and others who follow this issue closely, we firmly subscribe to the central principle stated there that "The use of animals should be reduced to the minimal level needed to obtain scientifically valid results and interpretations."

PETA stresses that the 1999 report of the National Academy of Sciences (NAS) on endocrine disruptors calls for additional research. We believe, however, that another look at the NAS report reveals substantial existing evidence of the effects of endocrine disruptors in wildlife and indications of effects in humans (see Attachment). More importantly, the NAS report closes by recommending the development of a testing program along the lines of that being pursued by EPA.

PETA has mistaken EPA's implementation of Congress's requirements. The EDSTP was created in response to scientific evidence that chemicals in the environment are linked to numerous adverse health effects in wildlife and likely in humans, and which indicated reason for further investigation. In August 1996, Congress unanimously passed laws requiring EPA to develop a method for screening and testing chemicals for estrogenic and other hormonal effects (in the Food Quality Protection Act of 1996 and the Safe Drinking Water Act Amendments of 1996). To carry out this important mandate, EPA convened a body of scientists from universities, government, industry, and public interest groups, known as the Endocrine Disruptor Screening and Testing Advisory Committee (EDSTAC). In September 1998, the EDSTAC issued a unanimous report outlining a chemical screening and testing program.

EDSTAC proposed a series of screens and tests that are intended to detect possible harm not only to humans, but to animals (e.g., fish, birds, and frogs) as well. Three of the eight screens proposed do not require live animals, and EDSTAC recommended that EPA explore the potential of a rapid robotic test tube-based approach for generating initial information on chemicals' impacts. EPA's initial test of the robotic approach failed, but the agency is exploring additional robotic test tube approaches.

EDSTAC proposed these screens and tests because human infants and children, domestic animals, and wildlife are all exposed daily to numerous chemicals with unknown health consequences. Efforts to protect children's and animal's health hinge on knowing where to focus our efforts and rely on vital information derived from animal testing as well as other scientific data. Unfortunately, all too often, our children, indeed all animals, are the 'guinea pigs' in an uncontrolled chemical experiment in

which they are exposed to untested chemicals with unknown health effects. That is because prior to the introduction of new chemicals (other than pesticides) to the commercial or consumer market, the manufacturer typically submits little to no information to EPA on possible health effects. Even pesticides are not currently tested for endocrine disruption or several other important health and developmental effects.

Ongoing harm to animals has been clearly demonstrated. A striking number of scientific studies have found endocrine disruption in birds (bald eagles, wood ducks, double-crested cormorants, herring gulls, California gulls, common terns, Forsters terns, roseate terns), fish (salmon, trout, croaker, roach, herring, sturgeon, kelp bass, mosquitofish, flounder, English sole, Northern pike, yellow perch, common carp), shellfish (whelks, clams, and oysters), and mammals (otter, mink, seals, beluga whale, and the California sea lion), in addition to alligators and turtles. These effects include brain damage, premature deaths, reproductive problems (including failure to reach sexual maturity), abnormal development of the reproductive tract, subtle and gross birth defects, thyroid dysfunction, severely weakened immune systems, cancers, and behavioral changes. There is evidence linking these serious health problems to hormone-mimicking chemicals in the environment. Unfortunately, out of the thousands of industrial chemicals emitted into our environment, we know the endocrine effects of only a tiny fraction, and that fraction has often been identified only through luck and coincidental findings. Consequently, it is imperative to test the multitude of chemicals currently in use, their alternatives, and the other new chemicals coming on the market for effects on the hormone system. And until we can come up with a better alternative, we sometimes have little choice but to test chemicals in a limited number of animals in order to protect everyone, including our children.

It is not entirely clear whether PETA is arguing for a complete ban on any and all scientific and medical tests on animals as a matter of principled opposition, or simply isn't persuaded that the hazard from endocrine disruption is great enough to justify a testing program using animals. Some people believe that all animal testing is unacceptable regardless of the benefits, because animals are incapable of giving informed consent to participate in such tests and will be killed or injured during the course of the tests. We understand this value-based position, but must disagree. Testing for endocrine disruption in a limited number of animals is necessary to prevent or address continued widespread exposures and attendant harms.

As already noted, the committee recognized that animal testing is necessary, but also urged minimizing reliance on animals (EDSTAC report, page 3-8). To eliminate nonessential screening and testing, the program includes a careful sorting and prioritizing process, so that of the 80,000+ chemicals listed in government records, only a very small subset of chemicals that are of real concern will be subjected to full screening and testing. Based on already available information, many will require no additional screening or testing, either in test tubes or animals. This preliminary sorting will be done using an EDSTAC-recommended database of known information on effects of and exposures to chemicals. EPA is now developing this database.

Several of the initial screens for endocrine activity are done in the test tube and will not harm any animals. Initial testing will help to hone new techniques to ultimately identify endocrine disrupting chemicals based on their chemical structure without animal testing. Over time, these new techniques may be substituted for live animal testing if they prove to have necessary predictive value. At present, however, there is no way to fully evaluate these widely used chemicals for endocrine disrupting effects without doing some testing in animals.

Animal protection advocates have an important role to play in the EDSTP implementation process. To that end, EPA recently added Dr. Robert Combes of the Fund for Replacement of Animals in Medical Experiments (FRAME) to the committee advising on program implementation. Dr. Combes represented PETA and two other animal protection organizations. EPA, in response to PETA's concerns about that committee meeting out of public view, is replacing it with a formal federal advisory committee that will meet in public to advise on program implementation. Animal welfare concerns will certainly be represented on that committee, and the person playing that role will be in an excellent position to convey a clear and accurate picture of the screening and testing program to the animal welfare community.

Out of our concern for both animal and human welfare, we feel strongly that the recommended screens and tests are justified and necessary to identify chemicals that may already be harming both animals and people.

Sincerely yours,

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