



April 5, 2001

Ingrid E. Newkirk
President
People for Ethical Treatment of Animals
501 Front Street
Norfolk, Virginia 23510

Dear Ms. Newkirk:

I am writing in response to your March 6 letter, requesting WWF's position on the use of animals in U.S. Environmental Protection Agency chemical-testing programs.

I am enclosing two documents that represent WWF's position. The first is a letter to Congress in April 2000 on animal testing in EPA's endocrine disruption screening and testing program. This letter was co-signed by Physicians for Social Responsibility, Natural Resources Defense Council, The Breast Cancer Fund, The Endometriosis Society, and the Learning Disabilities Association. We point out in the letter our support for reducing reliance on animals in testing chemicals.

However, we also note our support for testing because of the demonstrated harm to wildlife of chemicals already on the market. A striking number of scientific studies have found endocrine disruption in birds, fish, shellfish, mammals, alligators and turtles. Unfortunately, out of the thousands of industrial chemicals released 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. It is imperative to test the multitude of chemicals currently in use, their alternatives, and the other new chemicals coming on the market. The program EPA is contemplating includes tests not only to protect humans, but tests to protect other species. Until we can come up with a better alternative, we sometimes have little choice but to test chemicals on laboratory animals in order to protect a broader number of species, including current and future human generations.

The second enclosed document is the keynote speech from a workshop on endocrine disruption screening and testing organized last month by the Center for Alternatives to Animal Testing at Johns Hopkins University. WWF Senior Scientist Dr. Theo Colborn was invited to deliver these remarks. In her comments, Dr. Colborn

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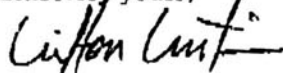


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restates WWF's support for reduced use of animals for testing chemicals. While reviewing current information on both wildlife and human health, she underscores the critical role studies on laboratory animals have played in establishing "the wildlife-human connection"--associations between chemical exposures and damage to both wildlife and humans. She then highlights some of the limitations of currently available non-animal tests for detecting critical components of hormone disruption and the many limitations of human epidemiological studies as acceptable alternatives to laboratory animal research. Dr. Colborn also notes that validated animal tests are critical for validating non-animal tests. Once validated, non-animal tests can replace tests on animals.

Thank you for your interest in our position.

Sincerely yours,



Clifton Curtis

Director

Global Toxic Chemicals Initiative

Attachments