

President Barack Obama
The White House
1600 Pennsylvania Ave NW
Washington, DC 20500

Lisa Jackson
EPA Administrator
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

May 6, 2009

Dear President Obama and EPA Administrator Jackson,

As nurses, doctors, and scientists, we are writing to express concern over the EPA's October 15, 2008 announcement to convene yet another review of the EPA's health assessment study on dioxins. **We request that you cancel the unnecessary review and release the Dioxin Reassessment, which has been delayed for almost 20 years.**

Dioxin is the name given to a group of persistent, very toxic chemicals that are unintentionally produced. The most toxic form of dioxin is 2,3,7,8-tetrachlorodibenzo-p-dioxin or TCDD. TCDD is more commonly recognized as the toxic contaminant found in Agent Orange and at Love Canal, New York and Times Beach, Missouri.

The US EPA completed its first health assessment of dioxin in 1985 and concluded that there was an increased cancer risk in humans at dioxin exposure levels lower than had been estimated by any government agency anywhere in the world. Industries that would be affected by regulations to limit or eliminate dioxin emissions and discharges into the environment challenged EPA's findings. As a result, in 1991 EPA Administrator William Riley announced that the agency would reassess the health risks posed by dioxin.

In 1994, the EPA released a draft report titled "*Exposure and Human Health Reassessment of 2,3,7,8-Tetrachlorodibenzo-p-Dioxin (TCDD) and Related Compound*," which is commonly known as the Dioxin Reassessment. This draft report was reviewed by the agency's Science Advisory Board (SAB), which approved most of the document but requested revisions of several chapters. These revisions were made by the agency, which released its final draft report in June 2000. These revisions were reviewed by several external peer review groups and again by the SAB, which approved the revisions to the reassessment document completing the final step in the agency's peer review process. On June 1, 2001, the EPA's SAB sent a letter to Administrator Whitman asking that the agency "proceed expeditiously" to complete and release the Dioxin Reassessment to the American people. Since then it's been further delayed.

In 2006, the National Academies released a report that provided comments on the reassessment. It also confirmed what numerous scientific panels have concluded: dioxin is a potent cancer-

causing chemical. On October 15th 2008, the EPA announced the formation of yet another SAB to review the Dioxin Reassessment. This new review will take at least several years to complete, which will further delay regulation of this chemical. The EPA states it will take until 2012 to complete another review.

Dioxin does not readily break down in the environment and exposure of the general population is a problem of cumulative emissions from many sources. According to the EPA, over 95 percent of human exposure to dioxin occurs through the diet, primarily foods derived from animals. Dioxin in air settles onto soil, water, and plant surfaces and over time accumulates in the animals that eat these plants. People then ingest the dioxin contained in meat, dairy products and eggs. Some exposure also results from eating dioxin-contaminated fish.

Dioxin causes a wide array of adverse health effects in both animals and humans. Dioxin is a potent cancer-causing agent and is considered to be a “known human carcinogen” by the World Health Organization’s International Agency for Research on Cancer and the U.S. Department of Health and Human Services’ National Toxicology Program. According to the US EPA draft report on dioxin’s health effects, the levels of dioxin-like compounds found in the general population may cause a lifetime cancer risk as high as 1 in 1,000. This is 1,000 times higher than the general “acceptable” risk level of 1 in 1,000,000. The human epidemiological evidence provides consistent findings of increased risk for all cancers combined and lung cancer in occupational studies as well as evidence of tissue specific increases in cancer. Increased mortality from soft-tissue sarcomas and all cancers among workers exposed to dioxin has also been reported.

Non-cancer health effects linked to dioxin exposure include a wide range of reproductive, developmental, immunological, and endocrine effects in both animals and humans. Animal studies show that dioxin exposure is associated with endometriosis, decreased fertility, inability to carry pregnancies to term, lowered testosterone levels, decreased sperm counts, birth defects, and learning disabilities. In children, dioxin exposure has been associated with IQ deficits, delays in psychomotor and neurodevelopment, and altered behavior including hyperactivity. Studies in workers have found lowered testosterone levels, decreased testis size, and birth defects in offspring of Vietnam veterans exposed to Agent Orange.

Effects on the immune system of the developing organism appear to be among the most sensitive endpoints studied. Animal studies show that dioxin decreased immune response and increased susceptibility to infectious disease. In human studies, dioxin was associated with immune system depression and alterations in immune status leading to increased infections. Dioxin can also disrupt the normal function of hormones – chemical messengers that the body uses for growth and regulation. For example, dioxin has been observed to interfere with thyroid levels in infants and adults, alter glucose tolerance, and has been linked to diabetes.

You have both stated that it is time to bring science back to the EPA, and that science should not be trumped by politics. Unfortunately for almost 20 years, science has been trumped by politics. It is time for the U.S. to prioritize science over politics and release the Dioxin Reassessment.

As nurses, doctors, and scientists, we urge you to cancel the unnecessary review and release the EPA's Dioxin Reassessment.

Thank you.

Sincerely,

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