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May 8, 2009

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

Dear President Obama and EPA Administrator Jackson,

I am contacting you on behalf of the American Nurses Association (ANA) 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 strongly urge you to cancel the unnecessary review and immediately release the Dioxin Reassessment, which has been delayed for almost 20 years.**

The ANA is the only full-service professional organization representing the interests of the nation's 2.9 million Registered Nurses through its 51 constituent member associations. ANA advances the nursing profession by fostering high standards of nursing practice, promoting the economic and general welfare of nurses in the workplace, projecting a positive and realistic view of nursing, and by advocating on health care affecting nurses and the public.

In 2006, the ANA House of Delegates (HOD) affirmed our commitment to preventing exposure to toxic chemicals to nurses, other healthcare workers, patients, and the public by passing a resolution entitled "Nursing Practice, Chemical Exposure, and the Right-to-Know". This resolution recognizes the need to reduce and eliminate the use of toxic chemicals requiring that less harmful chemicals be substituted whenever possible and create more streamlined methods for chemicals to be removed from use.

Dioxin(s) refers to a group of persistent, unintentionally produced, toxic chemicals. They do not readily break down in the environment and general population exposure is a problem of cumulative emissions from many sources. Dioxin air settles onto soil, water, and plant surfaces and over time accumulates up the food chain. According to the EPA, most dioxin exposure occurs through the diet, with over 95% from animal fats, including meat, eggs, and dairy products.

Dioxin is considered a "known human carcinogen" by the U.S. Department of Health and Human Services' National Toxicology Program and World Health Organization's International Agency for Research on Cancer. The US EPA completed its first health assessment of dioxin in 1985 and also 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.

The most toxic form of dioxin is 2,3,7,8-tetrachlorodibenzo-p-dioxin. It is recognized as the toxic contaminant found in Agent Orange and at Love Canal, New York. In 1994, the EPA released a draft report entitled "*Exposure and Human Health Reassessment of 2,3,7,8-Tetrachlorodibenzo-p-Dioxin*

(TCDD) and Related Compounds,” 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 and reviewed by several external peer groups. The SAB then approved the revisions which is final step in the agency’s peer review process. Subsequently, in June 2001, the SAB sent a letter to Administrator Whitman asking that the agency “proceed expeditiously” to complete and release the Dioxin Reassessment to the American people. Unfortunately, it continues to be delayed.

In 2006, the National Academy of Sciences released a report on the reassessment which was concluded that dioxin is a potent carcinogen. Even so, in October 2008, the EPA announced the formation of yet another SAB to review the Dioxin Reassessment. The agency estimates that it will take until 2012 to complete another review, which will further delay regulation of this chemical.

According to the EPA draft report, 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. Increased mortality from soft-tissue sarcomas and all cancers among workers exposed to dioxin has also been reported.

In addition to cancer, a range of endocrine (hormone), reproductive, developmental and immunological abnormalities have also been linked to dioxin. It can disrupt the normal function of hormones responsible 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. Animal studies have indicated associations with endometriosis, decreased fertility, terminated pregnancies, and lowered testosterone levels and sperm counts. Occupational studies have also reported lowered testosterone levels and decreased testicular size.

The National Academies report concluded that fetal rodents clearly show more susceptibility to adverse effects than adult rodents. In humans, birth defects have been observed in offspring of Vietnam veterans exposed to Agent Orange. Dioxin exposure has also been associated with IQ deficits, delays in psychomotor and neurodevelopment, and altered behavior (e.g. hyperactivity). 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 has been associated with immune system depression and alterations in immune status leading to increased infections.

The time to be proactive in protecting public health is now. You have stated that science, which has been trumped by politics for almost 20 years, should be brought back to the EPA. **Therefore, the ANA urges you to promptly cancel the unnecessary review and release the EPA Dioxin Reassessment.**

Thank you,



Rose Gonzalez, RN MPS
Director, Government Affairs
American Nurses Association

CC: Nancy Sutley, Chair, The White House Council on Environmental Quality

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