

January 12, 2012

Honorable Lisa P. Jackson  
Administrator  
Environmental Protection Agency  
1200 Pennsylvania Ave, N.W.  
Washington D.C. 20460

Dear Administrator Jackson:

Environmental Working Group, a nonprofit public health and advocacy organization based in Washington D.C., strongly supports the Environmental Protection Agency's plan to complete its re-analysis of dioxin toxicity for risks other than cancer by the end of this month. This assessment, in the works for nearly three decades, is essential as EPA moves to protect the health of Americans from exposure to dioxin and related compounds.

EWG has conducted extensive research on dioxin pollution in people since 2003. EWG's body burden studies have found 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) and other chlorinated dioxins and furans in blood samples from all 34 Americans tested and in every cord blood samples collected from 20 newborns at the moment of birth. Our most recent report, *EPA Must Finish the Job of Protecting People from Dioxin*, released in July 2010, concluded that the amount of dioxin a nursing infant consumes daily is up to 77 times higher than the level EPA has proposed to protect the endocrine and immune systems from dioxin toxicity. EWG has found that the general public can be exposed to up to 1,200 times more dioxin than EPA scientists have considered safe for cancer risk.

The danger of dioxin to human health was first recognized in the 1940s. Many Americans believe that dioxin pollution has been curbed by environmental laws and initiatives launched in the 1970s, with creation of the EPA. Yet, according to the EPA's own Toxics Release Inventory, hazardous waste facilities and metal refining plants still release dioxin pollution daily. The latest inventory shows that total disposal or other releases of dioxins increased by 18 percent between 2009 and 2010 and that air releases of dioxins increased by 10 percent in that period. It is no wonder that dioxin contamination remains widespread across the country.

Dioxins build up in the food chain by accumulating in the tissues of animals, especially in fat. Because of ongoing dioxin releases, the American food supply is widely contaminated with dioxins, including meat, fish, milk, eggs, butter and other foods Americans eat daily. As a consequence, exposures begin in the womb when dioxins cross the placenta. Newborn infants ingest them in mother's milk and formula.

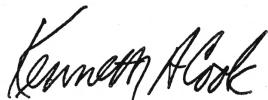
Breast-fed infants are among the most endangered Americans of all. Studies detect dioxin and dioxin-like compounds in human breast milk in amounts similar to highly contaminated foods

such as beef, cheese and fish. Since newborns can consume nothing but milk for a number of months, their exposure to dioxins is greater, for their body weight, than that of older children and adults. Adverse impacts of dioxins on children's health are of great concern, because early-life dioxin exposure has been linked to neurological alterations, including effects on hearing, psychomotor function, cognition, and gender-specific behaviors; effects on the reproductive organs; and hormonal changes.

EWG strongly supports EPA's approach for establishing a safe daily dose for human exposure to this potent chemical. EPA's method for deriving the reference dose for dioxin exposure is based on highly reliable data from human epidemiological studies. The maximum safe dose proposed by EPA scientists represents a balanced judgment and is not extreme or impractical. **This proposed standard should not be weakened.** A growing number of recent studies have found that dioxin is much more toxic at smaller doses than previously assumed. American policymakers and regulators must take rapid action to restrict dioxin exposures.

When EPA wraps up its dioxin reassessment for diseases other than cancer, this important document will serve as the cornerstone of the agency's initiatives to protect public health from chemical contaminants. Every day of delay is another day millions of Americans, including breast-fed babies, ingest this contaminant at levels the agency itself deems unsafe. It is essential for EPA to follow through with its commitment to protect the health of Americans from these toxic compounds.

Sincerely,



Ken Cook  
President, Environmental Working Group

Cc:

Cass R. Sunstein, Administrator for Office of Management and Budget's Office of Information and Regulatory Affairs,

Paul Anastas, Assistant Administrator for Environmental Protection Agency's Office of Research and Development