



Center for Health, Environment and Justice

Comments on the
Report on Carcinogens Draft Background Document for TCDD
October 31, 1997
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The CCHW Center for Health Environment and Justice is a non-profit organization that since 1981 has worked with grassroots community based groups dealing with problems caused by exposures to toxic chemicals. In general, we provide technical and organizing assistance in support of the efforts of these groups who are located across the United States. CCHW was founded by Lois Gibbs the woman who organized the community efforts at Love Canal in Niagara Falls, New York.

In 1994 when the USEPA released its draft reassessment report on dioxin, CCHW became committed to educating the American public about the dangers of dioxin. It was clear at that time that dioxin was a serious public health threat and that it was time to stop dioxin exposures. We have helped coordinate the nationwide and to some extent international efforts of community based groups to stop dioxin exposure.

I am here today to support the proposed Report on Carcinogens listing for 2,3,7,8-tetrachlorodibenzo-p-dioxin as a known human carcinogen. This determination is based on strong evidence in human studies that have found an association between dioxin and cancer mortality with respect to all cancers combined, non-Hodgkin's lymphoma and lung cancer. There is also powerful evidence from at least 7 studies in experimental animals that has shown that TCDD causes benign and malignant tumors at multiple sites in multiple species. This evidence is further supported by very strong evidence that indicates a basic similarity in the mechanism of induction and in the biochemical and toxicological responses in animal and human tissue to TCDD at comparable doses and tissue levels.

As you are aware, the carcinogenicity of TCDD was carefully and extensively reviewed this year by a Working Group of the International Agency for Research on Cancer (IARC). This group identified 4 high exposure cohorts in Germany, the Netherlands and the United States that found an overall increase in cancer mortality for all cancers combined and for lung cancer, but less strong evidence for cancer at any particular site. For both lung cancer and all cancers combined, the outcomes were consistent across studies. In addition, the IARC Working Group summarized and evaluated all human TCDD-cancer studies - a total of 31 studies - published through 1996 and reported a statistically significant increase in relative

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risk for all cancers combined, lung cancer and non-Hodgkin's lymphoma. Data from these studies indicate that for workers exposed largely to chlorophenoxy herbicides, there appears to be elevated risks for cancer of the testicle, thyroid gland, and other endocrine glands. IARC's overall conclusion was that TCDD is a human carcinogen.

Since the completion of the IARC report in February of this year, additional evidence of the carcinogenicity of TCDD in people was reported in the continuing study of the residents of Seveso, Italy who were exposed to TCDD in an accidental explosion in 1976. This study shows an increased risk for numerous cancers including stomach cancer and multiple myeloma in women, rectal cancer and leukemia in men, and non-Hodgkin's disease in both men and women.

It is clear from this mounting body of evidence that exposure to TCDD leads to the development of cancer in people, not just when workers are exposed to high levels but when people in a community are exposed to much lower levels. How many studies and how much proof is needed? This is not 1983 when there were only a few studies evaluating the risk of cancer following dioxin exposure. At that time the evidence of increased risk of cancer from exposure to dioxin was equivocal and controversial. This is not the case today. Study after study continue to show fairly conclusively that there is a strong relationship between dioxin exposure and cancer.

Combining the experimental data from animals with the epidemiological evidence and the similarity in dioxin mechanism of action in animals and people, the only prudent action is to declare TCDD a known human carcinogen.

The determination of the scientific working group at IARC alone should be sufficient for the NTP and the Annual Report on Carcinogens to follow IARC's lead. After all, did not the leading scientists in the world from government, industry and academia together, based on a thorough review of all the scientific data and information, conclude that dioxin was a human carcinogen?

There can be no scientific basis, given the decision made by the scientists at IARC to do anything but follow their lead. We all know that dioxin is a controversial substance because of its far reach into industry as well as society. But this decision is not about who is affected financially. Rather, it is about defining what is the best scientific evidence on the carcinogenicity of dioxin. We do not need to know every single aspect of the mechanism of how dioxin causes cancer to define it as a human carcinogen.

The American public is aware of dioxin and its dangers. They are aware of the decision made by IARC. At this time, it is appropriate for the National Toxicology Program to follow the lead of the expert scientific Working Group of IARC and to declare dioxin for what it is - a known human carcinogen.