



Managing Germs Without Toxic Chemicals

Taking on triclosan with growing momentum

By Nichelle Harriott

In the past year, a new momentum has taken hold of the ban triclosan grassroots campaign. Starting in 2004, with the groundbreaking publication of Beyond Pesticides' factsheet, "The Ubiquitous Triclosan," Beyond Pesticides, in joint partnership with Food and Water Watch and dozens of organizations, is leading a campaign to expose the dangers associated with the widespread use of the antibacterial pesticide triclosan. Recent developments have catapulted triclosan and the adverse impacts associated with its use into the national spotlight and has energized this growing grassroots movement. Now with over 80 environmental and public health groups, there is a renewed call for the banning of triclosan from consumer products, calling on manufacturers, retailers, school districts, local businesses and communities to wash their hands of triclosan and protect our nation's waters and public health.

While the science continues to mount against the continued use of triclosan, the federal government has been dragging its feet in addressing the issue. In light of this, Beyond Pesticides, Food and Water Watch and several other environmental and public health groups have petitioned both the U.S. Food and Drug Administration (FDA) and the U.S. Environmental Protection Agency (EPA), which share joint jurisdiction over the regulation of triclosan, to ban the non-medical uses of triclosan in consumer products.

These calls highlight the many human health and environmental threats posed by the antibacterial, including endocrine disruption, increased body burden, and water and soil contamination. Slowly the agencies have agreed to take a closer look at triclosan, with FDA stating that it hopes to finalize its review by 2011, and EPA stating that it will once again reevaluate the chemical in 2013. But with the completion of these reviews years away, it is imperative to take a strong stand and increase the momentum for change and action, working at the grassroots level, to remove this toxic chemical from our communities.

Petitioning the Government

The Environmental Protection Agency

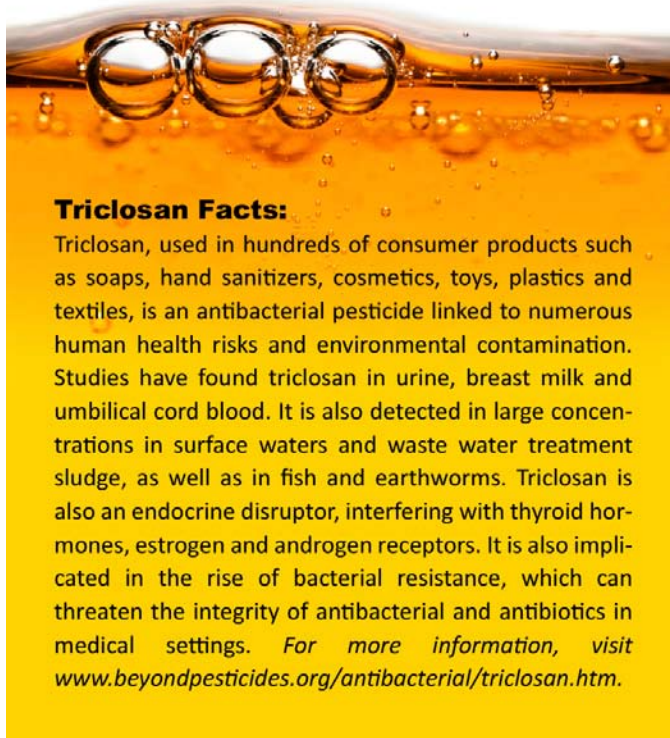
EPA has yet to adequately restrict this dangerous chemical. Having previously submitted comments to EPA during the summer of 2008, urging the agency to revoke the registration of triclosan, Beyond Pesticides continues to press the agency. By December 2008, EPA, after ignoring resounding criticism of its preliminary risk assessment by the environmental and public health community, found triclosan eligible for continued registration in plastics and textiles in its Reregistration Eligibility Decision (RED) document. This, even though EPA acknowledged in its assessment that triclosan can interfere with the thyroid hormone, is implicated in the

onset of bacterial resistance, and has contaminated surface waters across the U.S. EPA conceded, however, that based on the ongoing triclosan research, it would review the chemical again in 2013, ten years earlier than scheduled.

Finding this to be unsatisfactory, Beyond Pesticides and Food and Water Watch submitted a formal petition to the agency in January 2010, citing scientific and legal responsibility of EPA to ban the non-medical uses of triclosan. The petition cites numerous federal statutes, such as the *Clean Water Act*, *Safe Water Drinking Act*, and the *Endangered Species Act* under which the agency must act to stop the proliferation of triclosan. It is cosigned by over 80 environmental and public health groups around the country, including the American Federation of Teachers, Environmental Working Group, Physicians for Social Responsibility and several local Riverkeeper groups. To date, the EPA has not formally responded to this petition.

The Food and Drug Administration

Triclosan in over-the-counter (OTC) antiseptic drug products is regulated by FDA under the *Federal Food, Drug and Cosmetics Act* and its uses endorsed via an incomplete monograph, a regula-



Triclosan Facts:

Triclosan, used in hundreds of consumer products such as soaps, hand sanitizers, cosmetics, toys, plastics and textiles, is an antibacterial pesticide linked to numerous human health risks and environmental contamination. Studies have found triclosan in urine, breast milk and umbilical cord blood. It is also detected in large concentrations in surface waters and waste water treatment sludge, as well as in fish and earthworms. Triclosan is also an endocrine disruptor, interfering with thyroid hormones, estrogen and androgen receptors. It is also implicated in the rise of bacterial resistance, which can threaten the integrity of antibacterial and antibiotics in medical settings. For more information, visit www.beyondpesticides.org/antibacterial/triclosan.htm.

tory decision document similar to an EPA RED document. However, the tentative final monograph, which covers triclosan (and other antibacterial substances) for consumer and medical uses, has not been finalized since it was initiated in the early 1970s, and once amended in 1994. Environmental assessments, as required by the *National Environmental Protection Act* (NEPA), have also not been finalized. In July 2009, Beyond Pesticides and Food and Water Watch petitioned FDA, updating a 2005 petition filed by Beyond Pesticides, to ban the use of the controversial pesticide for non-medical applications. The petition cites violations of the *Federal Food,*

Drug and Cosmetics Act. The agency has not formally responded to the petition, but has stated that the petition is currently under consideration and shares concerns about triclosan's potential health effects and suggestions that it offers any more protection from bacteria than soap and water.

Congressional Scrutiny over Regulation

Following the submission of these petitions, U.S. Representative Edward J. Markey (D-Mass), Chairman of the Energy and Envi-

What You Can Do

Here are some things you can do as part of this campaign:

- Avoid products containing triclosan.
- Tell your friends and family about the health and environmental dangers of triclosan, and that regular soap and water works just as well.
- Encourage your local schools, government agencies, religious institutions and local businesses to use their buying power to go triclosan-free. Urge your municipality, institution or company to adopt the model resolution which commits to not procuring or using products containing triclosan.
- Write a letter (see sample letter on page 12) to your local grocery store, retailer or to the manufacturer of your favorite product asking them to stop using and/or selling triclosan and triclosan products.
- Support companies that do not use triclosan. Some companies that do not use triclosan include: Jason Natural Products, Kiss My Face, Nature's Gate, Method, Seventh Generation, CleanWell Company and Dr. Bronner's Magic Soaps.
- Sign the individual pledge (on next page) to not use products containing triclosan and support campaign efforts to end the consumer use of this hazardous chemical.
- Have your organization join the campaign to ask manufacturers to stop using triclosan in their products.

ronment Subcommittee of the Energy and Commerce Committee, sent letters to FDA and EPA expressing concern about the widespread use of triclosan, and questioning the lack of federal regulatory action to curb its proliferation. FDA responded to Rep. Markey's letter stating, "Existing data raise valid concerns about the [health] effects of repetitive daily human exposure to these antiseptic ingredients," and announced plans to address the use of triclosan in cosmetics or other products. Conversely, EPA responded that it does not currently plan to reevaluate its regulations regarding the use of triclosan until 2013, having completed the reregistration process for triclosan in 2008, when it found that triclosan was eligible for continued use.

Excerpts from FDA Letter Acknowledging Need for Triclosan Review

On Triclosan As An Endocrine Disruptor

Rep. Markey - Has the FDA reviewed the scientific evidence regarding the endocrine disrupting nature of triclosan and triclocarban? If yes, what has the FDA concluded? If not, why not?

FDA Response – *"FDA shares your concern over the potential effects of triclosan and triclocarban as endocrine disruptors that have emerged since we issued the Tentative Final Monograph (TFM) in 1994. It has been reported for example, that triclosan decreases thyroxine levels in a rat model and decreases the levels of androgens, leading to decreased sperm production in treated male rats, which indicated a potential perturbation in the hypo-pituitary-gonadal axis.....Finally there are some in vitro studies, as well as studies in several different animal species (including mammals), that suggest that triclosan may interfere with the thyroid system and have other endocrine-disrupting effects...."*

On Efficacy Of Triclosan

Rep. Markey- Has the FDA evaluated the efficacy of antiseptic washes used by consumers in reducing transmission of infection? Has the FDA determined that use of antiseptic handwashes is superior to washing hands with regular

soap using proper handwashing technique? If so, please describe the manner in which this demonstration was made.

FDA Response – *"..Analysis of many of these studies was presented to the Non-prescription Drugs Advisory Committee at a meeting on the risks and benefits of antiseptics for consumer use in October 2005. At that time, FDA was not aware of any evidence that antibacterial washes were superior to plain soap and water for reducing transmission of, or preventing infection for consumers..."*

The Pledge to Stop Using Triclosan Consumer Products

Triclosan, the toxic antibacterial pesticide, can be found in many consumer products, including, soaps, hand sanitizers, toys, counter tops, cutting boards, toothpaste and many others. It is also found in human breast milk, urine and other fatty tissues. Washing triclosan-containing products down the drain leads to long-term water, soil and wildlife contamination, and human poisoning.

I support the "Wash Your Hands of Triclosan Campaign," led by Beyond Pesticides and Food and Water Watch and supported by over 80 environmental and public health organizations, to protect human health and the environment from the dangers posed by triclosan.

By signing this pledge, I recognize that:

- Triclosan and its degradates are associated with adverse health effects, such as endocrine disruption, cancer and long-term bioaccumulation,
- Triclosan creates more potent strains of bacteria, increasing antibacterial and antibiotic resistance,
- Triclosan is accumulating in waterways and soil, resulting in hazardous residues in fish and crops, and
- The efficacy of triclosan is no greater than regular soap and water.

Therefore, as a consumer concerned about the threat triclosan poses to me, my family, friends, and the community, as well as the environment, I pledge to:

- Remove triclosan-containing products from my home,
- Choose soaps, hand sanitizers and other personal care products that do not contain triclosan,
- Learn more about the dangers of triclosan,
- Tell my friends and family about the dangers of triclosan,
- Support local and national efforts to remove triclosan products from schools, stores and other businesses,
- Support local and national efforts to ban triclosan in consumer products.



To sign the pledge online and learn about triclosan, visit www.beyondpesticides.org/antibacterial/triclosan.htm



Write a letter to your neighborhood retailer or favorite cosmetic company requesting that they take a stand to protect public health by discontinuing the sale of triclosan products at their store, and by signing the triclosan-free pledge (see <http://www.beyondpesticides.org/antibacterial/triclosan-pledge.htm>) to reaffirm their commitment to the well-being of the community they serve.

Many other businesses and communities around the country are going triclosan-free. You too can encourage your local businesses, school districts, municipalities and other local governments to avoid selling and using triclosan. We have a model resolution, sample retail letter and pledge available that can be used and adopted, along with other resources on our website for distribution among your community, family and friends. You can access these materials at www.beyondpesticides.org/antibacterial/action/index.htm. Contact Beyond Pesticides for ways to get involved in your community and for any help that you may need.

On Status Of Triclosan Regulation

Rep. Markey – What is the status of the final monograph ruling? When does FDA plan on promulgating finalized rules regarding over-the-counter (OTC) topical antimicrobial products?

FDA Response – *“FDA is working to issue a proposed rule to amend the 1994 tentative final monograph for OTC health care antiseptic drug products. This will permit us to incorporate the most up to date data and information into the monograph and ensure that the data meet FDA standards for safety and efficacy.”*

Take Action

Many are surprised to know that their favorite body wash or hand sanitizer contains triclosan. Triclosan may also be lurking unidentified in many cosmetics, hair accessories and plastics as a preservative. Of national brand soaps, triclosan or its cousin triclocarban was found in 76 percent of liquid soaps and 29 percent of bar soaps. In light of the potential for endocrine disruption and its accumulation in our bodies and the environment, and given that triclosan is no more effective than plain soap and water, the time is now to demand action. Recently, twenty local businesses and organizations around New Brunswick, NJ announced their commitment to not purchase, use or sell products that contain triclosan. Your community can be the next to go triclosan-free.

Sample Text Asking Retailers to Stop Selling Triclosan

Dear Sir/Madam,

I am writing to <your company> about my family’s concern about the products containing triclosan that are currently sold at your store. Triclosan is an antibacterial pesticide that is associated with many human health problems, as well as environmental contamination. I believe <your company> should stop the sale of these products since:

- Triclosan and its degradates are associated with adverse health effects, such as endocrine disruption, cancer and long-term bioaccumulation,
- Triclosan creates more potent strains of bacteria, increasing antibacterial and antibiotic resistance,
- Triclosan is accumulating in waterways and soil, resulting in hazardous residues in fish and food crops,
- The efficacy of triclosan is no greater than regular soap and water.

As a loyal customer of <your company>, my family, friends and I would appreciate your company taking a stand to protect public health by discontinuing the sale of triclosan-containing products at your store, and by signing the triclosan-free pledge (attached) to reaffirm your commitment to the well-being of the community you serve.

I look forward to hearing back from you and the opportunity to provide you with additional information. In the meantime, you can find additional scientific information at <http://www.beyondpesticides.org/antibacterial/triclosan.htm>.

Thank you for your urgent attention to this matter.

Sincerely,