Public Comment Needed on Ban Triclosan Petition by April 8, 2011

Your voice is critical in generating public comments on a petition, published in the Federal Register, to ban the antibacterial chemical triclosan. As you may know, this chemical, now found in the bodies of 75% of the U.S. population, is linked to endocrine disruption, bacterial and antibiotic resistance, dioxin contamination, and contaminated fish and biosolids.

You can also help get the word out by asking your network to let EPA know that triclosan must be banned to protect the public, workers and the environment. Click here for the document you can use to publicize the public comment period on Ban Triclosan petition.

EPA published in the Federal Register a petition, filed by 82 public health and environmental groups, to ban the hazardous antimicrobial/antibacterial pesticide triclosan for non-medical use. The chemical is found in products from clothing to soaps. The Federal Register notice (Petition for a Ban on Triclosan, 75 FR 76461, December 8, 2010) announces a public comment period until April 8, 2011 on the need to ban triclosan under numerous federal statutes from pesticides, clean water, safe drinking water, to endangered species.

SUGGESTED ACTION AND SAMPLE PUBLIC COMMENT:
Please send your own comments (see suggested language below) and notify your networks, listserves, faith organizations, etc. and post on your website, urging other people/organizations to comment. Thanks!

- Submit your own comments to the docket directly by clicking here. Fill in the form to submit your comments to the Federal Register (this method offers different levels of privacy). For a more impactful statement, use your own language. You can get ideas for what to write by going to Beyond Pesticides' Triclosan page or you can simply copy and paste from our sample language below, or;
- Click here to send an email directly to EPA Administrator Lisa Jackson. The link (sponsored by Organic Consumers Association) sends an automated message to Lisa Jackson.

Suggested Language (unique comments are extremely helpful)

Re: Petition for a Ban on Triclosan. Docket Number: EPAHQOPP20100548

I am writing to support the concerns raised in the petition regarding the prevalence of the toxic pesticide triclosan in consumer products. Research has shown that triclosan poses a threat to human health, contaminates water and persists in the environment. EPA has a responsibility under the law to protect the health of the public and the environment and must move to do so now. While the Centers for Disease Control and Prevention (CDC) finds triclosan concentrations are increasing in the human population, triclosan is too dangerous a chemical to be allowed in consumer products as it is causing involuntary exposure directly and through environmental contamination. Triclosan has been linked to:
- endocrine disruption as it interferes with the thyroid hormone, estrogen and androgen hormones and as a result can impact fetal development
- bacterial resistance and possible cross-resistance to antibiotics
- contaminated biosolids that are used for compost and agricultural fertilizer
- toxic and more persistent breakdown products including dioxins and other endocrine disruptors
- accumulation in plants, crustaceans and is toxic to amphibians, algal communities and certain fish species

Since triclosan is no more effective than regular soap and water at reducing bacteria, there is absolutely no need for triclosan to be incorporated into consumer products, given the hazards to people and the environment. I sincerely hope your agency takes the threats posed by triclosan seriously and moves quickly to rid this chemical from consumer products.

Sincerely,
<Your Name>
Organization, Concerned Citizen, etc.

**Background:**

The petition, filed on January 14, 2010, identifies pervasive and widespread use of triclosan and a failure of EPA to: (i) address the impacts posed by triclosan’s degradation products on human health and the environment, (ii) conduct separate assessment for triclosan residues in contaminated drinking water and food, and (iii) evaluate concerns related to antibacterial resistance and endocrine disruption. The petition cites violations of numerous environmental statutes, including laws on pesticide registration, the Clean Water Act, Safe Drinking Water Act, and Endangered Species Act. It also documents that triclosan is no more effective than regular soap and water in removing germs and therefore creates an unnecessary hazardous exposure for people and the environment. Regulated by both EPA and the U.S. Food and Drug Administration, triclosan is commonly found in clothing, toys, kitchen utensils and cutting boards, hair brushes, computer keyboards, countertops, plastics, facial tissues, hand soaps, cosmetics, toothpastes, deodorants, laundry detergents, fabric softeners, antiseptics, and medical devices. The petition to EPA seeks expedited action to ban household triclosan, challenging serious deficiencies in EPAs September 2008 re-registration of triclosan and its failure to comply with safety laws.

Research indicates that widespread use of triclosan causes a number of serious health and environmental problems. The Centers for Disease Control and Prevention finds in its 2009 report, National Report on Human Exposure to Environmental Chemicals, and 2010 update that triclosan is in the bodies of 75% of the U.S. population and its levels are increasing. A critical health concern is triclosans association with bacterial resistance to antibiotic medications and cleansers, a special problem for vulnerable populations such as infants, patients, and the elderly. Triclosan is an endocrine disruptor and has been shown to affect male and female reproductive hormones, which potentially increases cancer risk. Recent studies show triclosans adverse effects on fetal growth and development. Further, the
pesticide accumulates in biosolids, is taken up by food crops, and breaks down to different forms of dioxin, thereby exposing consumers to even more dangerous chemicals. “We’re calling on the public to urge EPA to consider the full extent of triclosan’s impact on people’s health and the environment and ban its non-medical uses,” said Jay Feldman executive director of Beyond Pesticides.

For more information, please contact:
Jay Feldman | jfeldman@beyondpesticides.org
Nichelle Harriott | nharriott@beyondpesticides.org
Beyond Pesticides, 202-543-5450