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*Cancer prevention through reduction of carcinogens in air, water, the workplace, and consumer products.*  
**www.preventcancer.com**

June 9, 2009

The Honorable Edward M. Kennedy  
Chairman  
Senate Committee on Health, Education, Labor and Pensions  
428 Senate Dirksen Office Building  
Washington, D.C. 20510

The Honorable Michael B. Enzi  
Ranking Minority Member  
Senate Committee on Health, Education, Labor and Pensions  
Washington, D.C. 20510

Dear Chairman Kennedy and Ranking Member Enzi:

President Obama has boldly pledged to reform the national health care system. Central to this, as the president has stressed, is containing the spiraling costs of health care -- costs which are soaring at about 6% each year. Most experts agree that this is not possible without a better plan to prevent Americans from getting sick in the first place. This year, 1.5 million people will be diagnosed with cancer, from which 562,000, over 1,500 daily, will die.

The epidemic of cancer strikes as many as one in three Americans and takes the life of one in four. After 37 years of losing the war against cancer (a war that President Nixon originally declared in December 1971), we are taking grossly and demonstrably inadequate action to protect us from this menace.

While research on the prevention, and treatment of cancer is predominantly the responsibility of the National Cancer Institute (NCI), other governmental agencies are also involved. These include the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), the Consumer Product Safety Commission (CPSC), and the Food and Drug Administration (FDA). Unfortunately, such action is uncoordinated and unbalanced amongst these governmental agencies.

The connection between our losing the cancer war and the need to control costs through prevention is clear. Cancer is not only one of the most costly and sometimes deadly diseases in America, it is also one of the most preventable. Based on recent estimates by the National Institutes of Health, the total costs of cancer are \$219 billion. The annual costs to taxpayers of diagnosis and treatment amount to \$89 billion; the annual costs of premature death are conservatively estimated at \$112 billion; and the annual costs due to lost productivity are conservatively estimated at \$18 billion. And these are the quantifiable, inflationary economic costs. The human costs surely are of far greater magnitude.

To be sure, smoking remains the best-known and single largest cause of cancer, particularly lung cancer. While incidence rates of lung cancer in men have declined by 20% over the past three decades, rates in women increased by 111%. But more importantly, non-smoking cancers -- due to known chemical and physical carcinogens -- have increased substantially since 1975. Some of the more startling realities in the failure to prevent cancer are illustrated by their soaring rates of increase. These include:

- Malignant melanoma of the skin in adults is increasing by 168% due to the use of sunscreens in childhood that fail to block long wave ultraviolet light;
- Thyroid cancer is increasing by 124% due in large part to ionizing radiation;
- Non-Hodgkin's lymphoma is increasing 76% due mostly to phenoxy herbicides; and phenylenediamine hair dyes;
- Testicular cancer is increasing by 49% due to pesticides; hormonal ingredients in cosmetics and personal care products; and estrogen residues in meat;
- Childhood leukemia is increasing by 55% due to ionizing radiation; domestic pesticides; nitrite preservatives in meats, particularly hot dogs; and parental exposures to occupational carcinogens;
- Ovary cancer (mortality) for women over the age of 65 has increased by 47% in African American women and 13% in Caucasian women due to genital use of talc powder;
- Breast cancer is increasing 17% due to a wide range of factors. These include: birth control pills; estrogen replacement therapy; toxic hormonal ingredients in cosmetics and personal care products; diagnostic radiation; and routine premenopausal mammography, with a cumulative breast dose exposure of up to about five rads over ten years. Reflecting these concerns, Representatives Debbie Wasserman-Schultz and Henry Waxman have introduced bills promoting educational campaigns, including teaching regular breast self examination, to high school students. However, and in spite of its scientifically proven efficacy, this initiative has been strongly challenged by breast cancer prevention "experts" who remain unaware of the scientific evidence on the cancer risks of high dose radiation premenopausal mammography. Furthermore, these "experts" are unaware of the well-documented scientific evidence of avoidable causes of breast cancer, other than factors related to . . . "childbirth and breastfeeding."

It is now beyond dispute in the independent scientific community -- particularly scientists who have no financial ties to drug industries which aggressively promote dubious treatments for cancer -- that environmental and occupational exposures to carcinogens are the primary cause of non-smoking related cancers. An October 2007 publication on environmental and occupational causes of cancer by Dr. Richard Clapp and his colleagues further emphasized that the increasing incidence of cancer is due to preventable exposures to carcinogens in the workplace and environment.<sup>1, 2</sup>

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<sup>1</sup> The Clapp report provides a wide range of evidence showing preventable cancers resulting from environmental exposures. These include formaldehyde, chlorinated organic pesticides, and organic solvents.

<sup>2</sup> The Clapp report also cites a wealth of evidence attributing the increasing incidence of lung cancers to preventable occupational exposures to asbestos, silica, chromium VI, formaldehyde, methylene chloride, benzene, and ethylene oxide.

The NCI is the primary federal agency devoted exclusively to fighting cancer. Paradoxically, the escalating incidence of cancer over the last thirty years parallels its sharply escalating annual budget — from \$690 million in 1975 to \$6 billion this year. Of this a mere \$131 million is allocated to NCI's mission on Prevention and Early Detection. Furthermore, President Obama has proposed a 5% increase in funding the NCI for unspecified cancer research, with a doubling to \$11.5 billion over the next eight years.

However, in spite of well-documented evidence relating the escalating incidence of cancer to a wide range of avoidable carcinogenic exposures, the NCI remains “asleep at the wheel,” and has stubbornly refused to devote significant resources or even attention to prevention. The NCI has also ignored proddings from Congress and independent scientific experts to develop a comprehensive registry of carcinogens. Worse still, the NCI has misled the public by claiming that most cancers are due to unhealthy behavior, “blaming the victim,” despite overwhelming evidence to the contrary.<sup>3</sup>

Furthermore, the NCI has touted the imminent success of new cancer treatments – promises that have seldom borne out, and which have been widely questioned by the independent scientific community. For instance, in 2004, Nobel laureate Leland Hartwell, President of the Fred Hutchinson Cancer Control Center, warned that Congress and the public are not paying NCI \$4.7 billion a year, most of which is spent on “promoting ineffective drugs” for terminal disease.

As members of the independent scientific community, we welcome the Obama Administration's goal of health care reform and prevention. But while President Obama has put forward a unique cancer plan, it too focuses far too much on the diagnosis and treatment of cancer, rather than on prevention. The simple truth is that the more cancer is prevented, the less there is to treat. That will also save lives and money.

Congress now has an epochal opportunity to reform our health care system and prevent diseases, particularly cancer, from occurring in the first place. By taking some simple steps, Congress should enact reforms to prevent cancer. Accordingly, we recommend that Congress enact the following specific legislative reforms to the 1971 National Cancer Act:

1. Congress declares that it is the national policy of the United States to reduce carcinogenic exposures to confirmed or suspected carcinogens by at least half during the next decade.<sup>4</sup>
2. Congress shall create a Deputy Director for Cancer Prevention of the NCI who, in consultation with the administrators of EPA, OSHA, CPSC, FDA and other relevant regulatory agencies, shall report to Congress annually on steps needed during the next decade, under existing regulatory authority, to reduce, by at least half, exposures reasonably anticipated to reduce the prevalence of future preventable cancers.
3. The Deputy Director of NCI shall meet quarterly with the administrators of EPA, OSHA, CPSC, FDA and other relevant regulatory agencies to identify opportunities to reduce

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<sup>3</sup> NCI officials have claimed, for instance that 94% of all cancers are due to “unhealthy behavior” such as smoking, poor nutrition, inactivity, obesity and over exposure to sunlight – and that a mere 6% is attributable to exposures to environmental and occupational exposures. These estimates are based on those published in 1981 by the late U.K. epidemiologist Sir Richard Doll. However, from 1976 to 1999, Doll had been a closet consultant to U.K. and U.S. industries, including the asbestos, General Motors, and Monsanto. Following revelation of these conflicts of interest, just prior to his death in 2002, Doll admitted that most cancers, other than those related to smoking and hormones, “are induced by exposure to chemicals often environmental.”

<sup>4</sup> However, cancer incidence rates will continue to increase for longer because of past and current exposures to carcinogens including acrolein, methyl bromide and acetaldehyde.

- exposures to carcinogens in the environment, the workplace, pharmaceuticals, and consumer products -- food, household products, and cosmetics and personal care products.
4. The Deputy Director's annual report shall include recommendations for changes in statutes, regulations and enforcement authority, necessary to achieve this national policy, in consultation with the administrators of the EPA, OSHA, CPSC, FDA and other relevant regulatory agencies.
  5. Congress shall allocate at least 40% of the NCI budget to explicit prevention related programs for FY 2011, and 50% by FY 2014.
  6. Congress shall mandate the annual publication of a comprehensive register of carcinogens. This will provide federal, state and local governments, as well as the public, with comprehensive information on carcinogens in the workplace, environment, and consumer products so that necessary preventive action can be promptly undertaken.

These steps alone will not win the war against cancer, but they will be critical in redirecting a failing war on cancer that can best be described as one of the most notorious public health failures of the 20<sup>th</sup> century. Cancer prevention is a critical public policy area in which reform is long well overdue.

Sincerely,

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*This letter was also sent to the following Congressional committees: Committee on Energy and Commerce; Senate Committee on Appropriations; and the House Committee on Appropriations.*