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The Editor
Harefuah
39 Shaul Hamelech Blvd.
Tel-Aviv
ISRAEL

Dear Sir:

I have examined the recent Consumer Shield report by Dr. Jerry Westin on Carcinogens in Israeli milk and milk products, together with the subsequent "rebuttals" published in the Jerusalem Post (December 19, 1977) by the Israeli Milk Council, and would like to offer the following comments.

The Consumer Shield report is a careful and conservative statement of the substantial carcinogenic hazards posed to the Israeli population by the very high residues of carcinogenic pesticides in their dairy products. The facts summarized in this report are consistent with generally accepted views on environmental carcinogenesis, and also reflect the deep concerns which have led to the strict regulation and banning in the U.S. of various organochlorine pesticides, including DDT, Aldrin and Dieldrin, apart from the current proceedings to ban Chlordane and Heptachlor. These regulatory proceedings reflect the overwhelming consensus in the qualified scientific community in the U.S. that there is no known method for setting threshold or safe levels for environmental carcinogens, and that carcinogenicity data derived from animal tests may be appropriately extrapolated to humans. There is a strong presumption that chemicals found to be carcinogenic in animals also pose carcinogenic hazards to humans.

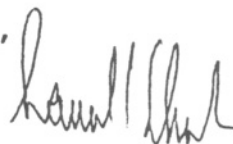
The statements in the Jerusalem Post article attempting to rebut the Consumer Shield report, appear to reflect a lack of understanding and information on the scientific and regulatory implications of problems of environmental carcinogenesis and of carcinogenic dietary residues. Additionally, these statements are in error in the following regard:

1. The claim that "it has never been clearly proved that this substance (DDT) is a carcinogen" is at variance with the results of a wide range of carcinogenicity tests in mice and rats, which have unequivocally concluded that DDT is carcinogenic. These conclusions were clearly stated in 1969 by an HEW Commission on Pesticides and their Relationship to Environmental Health, and formed the basis of the subsequent U.S. decision to cancel all major uses of DDT.

2. The inference that there are safe levels of human exposure to carcinogens is contrary to prevailing scientific opinion and to major legislative and regulatory policies in the U.S., besides elsewhere.
3. The inference that the carcinogenicity data on benzenehexachloride (BHC) are not relevant to human risk because these were obtained in tests based on the administration of quantities much greater than those found in milk is both misleading and contrary to the fundamental principles of carcinogenicity testing. It is axiomatic that carcinogenicity tests must be conducted at levels, greatly in excess of those to which humans are exposed in attempts to reduce the gross insensitivity of these tests, which are based on small numbers of animals compared with the millions of humans at presumptive risk.
4. The more rapid rate of elimination of BHC from the body than DDT is no assurance of safety, whatsoever. Many known carcinogens, ranging from nitrosamines to polycyclic hydrocarbons, are rapidly metabolised or cleared from the body without leaving significant residues.
5. The statement that the excess of brain cancers among Jews is genetic in origin is speculative in extreme, and based on very slender evidence published in a single article (Vaun Newill, J NCI 26: 405, 1961), which was subsequently challenged (Cohen, A and Modan, B., Cancer 22: 1323, 1968), when an alternative explanation based on environmental carcinogens was offered.

There seems to be little question that Israeli use of pesticides, in general, and carcinogenic organochlorines including DDT, BHC, Dieldrin and Heptachlor, in particular, are excessive, and that they are associated with high carcinogenic residues in dairy products, besides high residues in humans. There also appears to be evidence of substantial recent increases in overall cancer mortality rates in Israel, besides in rates for various organs. These are matters for urgent and serious concerns, which merit informed attention and action.

Sincerely yours,



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