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ONE HUNDRED ELEVENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON ENERGY AND COMMERCE
2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6115

Majority (202) 225–2927
Minority (202) 225–3641

April 13, 2010

Ian Cook
CEO and President
Colgate-Palmolive Company
300 Park Avenue
New York, NY 10022-7499

Dear Mr. Cook:

I am writing to you to because your company makes products, including Irish Spring and Palmolive hand soaps and Colgate Total toothpaste, which contain the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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[1] Reiss, R., N. Mackay, C. Habig, and J. Griffin. 2002. *An ecological risk assessment for triclosan in lotic systems following discharge from wastewater treatment plants in the United States.* Environmental Toxicology and Chemistry, 21(11): 2483-2492.

[2] Beyond Pesticides *The Ubiquitous Triclosan*, Aviva Glaser (beyondpesticides.org) Vol. 24, No. 3, 2004 Examples of soaps containing triclosan are: Dial® Liquid Soap; Softsoap® Antibacterial Liquid Hand Soap, CVS Antibacterial Soap, Dawn® Complete Antibacterial Dish Liquid, Ajax® Antibacterial Dish Liquid; In June 2009, FDA warned against marketing fraudulent virus claims: (online at http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm166801.html (Jun 15, 2009)

Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over

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[3] Heidler J, Sapkota A, Halden RU.2006. *Partitioning, Persistence, and Accumulation in Digested Sludge of the Topical Antiseptic Triclocarban during Wastewater Treatment.* Environmental Science and Technology, 40(11):3634-9.

[4] Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

[5] Rolf U. Halden and Daniel H. Paull. 2005. *Co-Occurrence of Triclocarban and Triclosan in U.S. Water Resources.* Environmental Science and Technology, 39(6):1420–1426.

[6] Calafat AM, Ye X, Wong LY, Reidy JA, Needham LL. 2008. *Urinary concentrations of triclosan in the U.S. population: 2003-2004.* Environmental Health Perspectives, 116(3):303-7.

[7] April 8, 2010: Food and Drug Administration, *Triclosan: What Consumers Should Know* (April 8, 2010) (online at http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm205999.htm); previous announcement in 2005; WebMD, FDA Panel: No Advantage to Antibacterial Soap, October 20, 2005 (online at http://www.webmd.com/news/20051020/fda-panel-no-advantage-to-antibacterial-soap).

[8] See for example: Aiello AE, Larson EL, Levy SB, 2007, *Consumer antibacterial soaps: effective or just risky?* Clinical Infectious Diseases, 45:S137–S147.

sustained periods of time.[9] The Environmental Protection Agency (EPA) has concluded from animal studies that triclosan disrupts thyroid hormone levels, which is important for brain development.[10] In addition, studies by the EPA also indicate that triclosan has the potential to affect the estrogen system. While triclocarban is a lesser studied compound, it has been shown in laboratory studies to interfere with normal testosterone action.[11] In evaluating all of the endocrine disruption data for triclosan and triclocarban FDA has also concluded "that existing data of triclosan raise valid concerns about the effects of repetitive daily human exposure to these antiseptic ingredients."[12]

Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate.".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Colgate-Pamolive voluntarily cease making and marketing hand soaps, dish detergent and other consumer soaps, such as Irish Spring and Palmolive hand soaps that contain these antimicrobial agents, products intended to come into contact with food and products marketed specifically to children. In addition, I ask that your company evaluate the endocrine disrupting impact of triclosan used in Colgate Total toothpaste. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

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[9] See, for example, Kumar V, Chakraborty A, Kural MR, Roy P. 2009. *Alteration of testicular steroidogenesis and histopathology of reproductive system in male rats treated with triclosan.* Reproductive Toxicology 27(2):177-85 and Kevin M. Crofton, Katie B. Paul , Michael J. DeVito, Joan M. Hedge. 2007. *Short-term in vivo exposure to the water contaminant triclosan: Evidence for disruption of thyroxine.* Environmental Toxicology and Pharmacology, 24:194–197.

[10] Letter from Assistant Administrator Stephen A. Owens, EPA Office of Prevention, Pesticides and Toxic Substances to Subcommittee Chairman Edward J. Markey, (March 5, 2010) (online at http://markey.house.gov/docs/epatriclosanresponse.pdf).

[11] Letter from FDA Assistant Commissioner of Legislation Jeanne Ireland to Subcommittee Chairman Edward J. Markey (February 23, 2010) (online at http://markey.house.gov/docs/fdatriclosanresponsereducœd.pdf).

[12] Id.

Thank you for your consideration of this request. I would also respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact, willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
Subcommittee on Energy and Environment

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WASHINGTON, DC 20515–6115

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April 13, 2010

Mark D. Ketchum
President and CEO
Newell Rubbermaid Inc.
10 B Glenlake Parkway, Suite 300
Atlanta, GA 30328
Fax: 770-407-3970

Dear Mr. Ketchum:

I am writing to you to because your company makes products, such as hard sided coolers, which contain Microban, a trademarked chemical formulation that sometimes uses the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, handwashes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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[1] Reiss, R., N. Mackay, C. Habig, and J. Griffin. 2002. *An ecological risk assessment for triclosan in lotic systems following discharge from wastewater treatment plants in the United States.* Environmental Toxicology and Chemistry, 21(11): 2483-2492.

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Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over

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[4] Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

[5] Rolf U. Halden and Daniel H. Paull. 2005. *Co-Occurrence of Triclocarban and Triclosan in U.S. Water Resources.* Environmental Science and Technology, 39(6):1420–1426.

[6] Calafat AM, Ye X, Wong LY, Reidy JA, Needham LL. 2008. *Urinary concentrations of triclosan in the U.S. population: 2003-2004.* Environmental Health Perspectives, 116(3):303-7.

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[8] See for example: Aiello AE, Larson EL, Levy SB. 2007. *Consumer antibacterial soaps: effective or just risky?* Clinical Infectious Diseases, 45:S137–S147.

sustained periods of time.[9] The Environmental Protection Agency (EPA) has concluded from animal studies that triclosan disrupts thyroid hormone levels, which is important for brain development.[10] In addition, studies by the EPA also indicate that triclosan has the potential to affect the estrogen system. While triclocarban is a lesser studied compound, it has been shown in laboratory studies to interfere with normal testosterone action.[11] In evaluating all of the endocrine disruption data for triclosan and triclocarban FDA has also concluded "that existing data of triclosan raise valid concerns about the effects of repetitive daily human exposure to these antiseptic ingredients."[12]

Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Newell Rubbermaid voluntarily cease making and marketing hard sided coolers, hand gel, washes and soaps, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents alone or as a part of the Microban formulation. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact,

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[9] See, for example, Kumar V, Chakraborty A, Kural MR, Roy P. 2009. *Alteration of testicular steroidogenesis and histopathology of reproductive system in male rats treated with triclosan.* Reproductive Toxicology 27(2):177-85 and Kevin M. Crofton, Katie B. Paul , Michael J. DeVito, Joan M. Hedge. 2007. *Short-term in vivo exposure to the water contaminant triclosan: Evidence for disruption of thyroxine.* Environmental Toxicology and Pharmacology, 24:194–197.

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willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
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The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
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Majority (202) 225–2927
Minority (202) 225–3641

April 13, 2010

Leslie H. Wexner
CEO
Limited Brands
Three Limited Parkway
Columbus OH 43230

Dear Mr. Wexner:

I am writing to you to because your company makes products, including Bath and Body Hand Gel, which contain the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over

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sustained periods of time.[9] The Environmental Protection Agency (EPA) has concluded from animal studies that triclosan disrupts thyroid hormone levels, which is important for brain development.[10] In addition, studies by the EPA also indicate that triclosan has the potential to affect the estrogen system. While triclocarban is a lesser studied compound, it has been shown in laboratory studies to interfere with normal testosterone action.[11] In evaluating all of the endocrine disruption data for triclosan and triclocarban FDA has also concluded "that existing data of triclosan raise valid concerns about the effects of repetitive daily human exposure to these antiseptic ingredients."[12]

Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Limited Brands voluntarily cease making and marketing hand gel, washes and soaps such as Bath and Body Hand Gel, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact,

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[12] Id.

willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
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April 13, 2010

Mr. Michael Treschow
CEO
Unilever PLC
Unilever House
100 Victoria Embankment
London EC4Y ODY
United Kingdom
Fax: 44-20-7822-5951

Dear Mr Treschow.:

I am writing to you to because your company makes products, including Vaseline Brand Intensive Care Antibacterial Hand Lotion, some Lever 2000 soaps and Suave Liquid Hand Soap, Antibacterial, with Extra Aloe, which contain the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Liquid Hand Soap, CVS Antibacterial Soap, Dawn® Complete Antibacterial Dish Liquid, Ajax® Antibacterial Dish Liquid; In June 2009, FDA warned against marketing fraudulent virus claims: http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm166801.html (Jun 15, 2009)

[3] Heidler J, Sapkota A, Halden RU.2006. *Partitioning, Persistence, and Accumulation in Digested Sludge of the Topical Antiseptic Triclocarban during Wastewater Treatment.* Environmental Science and Technology, 40(11):3634-9.

[4]Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

[5] Rolf U. Halden and Daniel H. Paull. 2005. *Co-Occurrence of Triclocarban and Triclosan in U.S. Water Resources.* Environmental Science and Technology, 39(6):1420–1426.

[6] Calafat AM, Ye X, Wong LY, Reidy JA, Needham LL. 2008. *Urinary concentrations of triclosan in the U.S. population: 2003-2004.* Environmental Health Perspectives, 116(3):303-7.

[7] April 8, 2010: Food and Drug Administration, *Triclosan: What Consumers Should Know* (April 8, 2010) (online at http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm205999.htm); previous announcement in 2005; WebMD, FDA Panel: No Advantage to Antibacterial Soap, October 20, 2005 (online at http://www.webmd.com/news/20051020/fda-panel-no-advantage-to-antibacterial-soap).

[8] See for example: Aiello AE, Larson EL, Levy SB. 2007. *Consumer antibacterial soaps: effective or just risky?* Clinical Infectious Diseases, 45:S137–S147.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over sustained periods of time.[9] The Environmental Protection Agency (EPA) has concluded from animal studies that triclosan disrupts thyroid hormone levels, which is important for brain development.[10] In addition, studies by the EPA also indicate that triclosan has the potential to affect the estrogen system. While triclocarban is a lesser studied compound, it has been shown in laboratory studies to interfere with normal testosterone action.[11] In evaluating all of the endocrine disruption data for triclosan and triclocarban FDA has also concluded "that existing data of triclosan raise valid concerns about the effects of repetitive daily human exposure to these antiseptic ingredients."[12]

Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Unilever voluntarily cease making and marketing hand gel, washes and soaps such as Vaseline Brand Intensive Care Antibacterial Hand Lotion, some Lever 2000 soaps and Suave Liquid Hand Soap (Antibacterial with Extra Aloe), products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents. I believe that such a step would

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[9] See, for example, Kumar V, Chakraborty A, Kural MR, Roy P. 2009. *Alteration of testicular steroidogenesis and histopathology of reproductive system in male rats treated with triclosan.* Reproductive Toxicology 27(2):177-85 and Kevin M. Crofton, Katie B. Paul , Michael J. DeVito, Joan M. Hedge. 2007. *Short-term in vivo exposure to the water contaminant triclosan: Evidence for disruption of thyroxine.* Environmental Toxicology and Pharmacology, 24:194–197.

[10] Letter from Assistant Administrator Stephen A. Owens, EPA Office of Prevention, Pesticides and Toxic Substances to Subcommittee Chairman Edward J. Markey, (March 5, 2010) (online at http://markey.house.gov/docs/epatriclosanresponse.pdf).

[11] Letter from FDA Assistant Commissioner of Legislation Jeanne Ireland to Subcommittee Chairman Edward J. Markey (February 23, 2010) (online at http://markey.house.gov/docs/fdatriclosanresponsereduced.pdf).

[12] Id.

demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact, willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
Subcommittee on Energy and Environment

HENRY A. WAXMAN, CALIFORNIA
CHAIRMAN

JOE BARTON, TEXAS
RANKING MEMBER

ONE HUNDRED ELEVENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON ENERGY AND COMMERCE
2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6115

Majority (202) 225–2927
Minority (202) 225–3641

April 13, 2010

Mr. Jeffrey C. Piccolomini
President
Henkel of America, Inc.
1001 Trout Brook Crossing
Rocky Hill, CT 06067-3910
Fax: 860-571-5465

Dear Mr. Piccolomini:

I am writing to you to because your company makes products, such as Dial Liquid Antibacterial Soap, which contain the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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[1] Reiss, R., N. Mackay, C. Habig, and J. Griffin. 2002. *An ecological risk assessment for triclosan in lotic systems following discharge from wastewater treatment plants in the United States.* Environmental Toxicology and Chemistry, 21(11): 2483-2492.

[2] Beyond Pesticides *The Ubiquitous Triclosan*, Aviva Glaser(beyondpesticides.org) Vol. 24, No. 3, 2004 Examples of soaps containing triclosan are: Dial® Liquid Soap; Softsoap® Antibacterial Liquid Hand Soap, CVS Antibacterial Soap, Dawn® Complete Antibacterial Dish Liquid, Ajax® Antibacterial Dish Liquid; In June 2009, FDA warned against marketing fraudulent virus claims: http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm166801.html (Jun 15, 2009)

Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over

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[3] Heidler J, Sapkota A, Halden RU.2006. *Partitioning, Persistence, and Accumulation in Digested Sludge of the Topical Antiseptic Triclocarban during Wastewater Treatment.* Environmental Science and Technology, 40(11):3634-9.

[4] Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

[5] Rolf U. Halden and Daniel H. Paull. 2005. *Co-Occurrence of Triclocarban and Triclosan in U.S. Water Resources.* Environmental Science and Technology, 39(6):1420–1426.

[6] Calafat AM, Ye X, Wong LY, Reidy JA, Needham LL. 2008. *Urinary concentrations of triclosan in the U.S. population: 2003-2004.* Environmental Health Perspectives, 116(3):303-7.

[7] April 8, 2010: Food and Drug Administration, *Triclosan: What Consumers Should Know* (April 8, 2010) (online at http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm205999.htm); previous announcement in 2005; WebMD, FDA Panel: No Advantage to Antibacterial Soap, October 20, 2005 (online at http://www.webmd.com/news/20051020/fda-panel-no-advantage-to-antibacterial-soap).

[8] See for example: Aiello AE, Larson EL, Levy SB. 2007. *Consumer antibacterial soaps: effective or just risky?* Clinical Infectious Diseases, 45:S137–S147.

sustained periods of time.[9] The Environmental Protection Agency (EPA) has concluded from animal studies that triclosan disrupts thyroid hormone levels, which is important for brain development.[10] In addition, studies by the EPA also indicate that triclosan has the potential to affect the estrogen system. While triclocarban is a lesser studied compound, it has been shown in laboratory studies to interfere with normal testosterone action.[11] In evaluating all of the endocrine disruption data for triclosan and triclocarban FDA has also concluded "that existing data of triclosan raise valid concerns about the effects of repetitive daily human exposure to these antiseptic ingredients."[12]

Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Henkel voluntarily cease making and marketing hand gel, washes and soaps such as Dial Liquid antibacterial Soap, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact,

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[9] See, for example, Kumar V, Chakraborty A, Kural MR, Roy P. 2009. *Alteration of testicular steroidogenesis and histopathology of reproductive system in male rats treated with triclosan.* Reproductive Toxicology 27(2):177-85 and Kevin M. Crofton, Katie B. Paul , Michael J. DeVito, Joan M. Hedge. 2007. *Short-term in vivo exposure to the water contaminant triclosan: Evidence for disruption of thyroxine.* Environmental Toxicology and Pharmacology, 24:194–197.

[10] Letter from Assistant Administrator Stephen A. Owens, EPA Office of Prevention, Pesticides and Toxic Substances to Subcommittee Chairman Edward J. Markey, (March 5, 2010) (online at http://markey.house.gov/docs/epatriclosanresponse.pdf).

[11] Letter from FDA Assistant Commissioner of Legislation Jeanne Ireland to Subcommittee Chairman Edward J. Markey (February 23, 2010) (online at http://markey.house.gov/docs/fdatriclosanresponsereducœd.pdf).

[12] Id.

willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
Subcommittee on Energy and Environment

HENRY A. WAXMAN, CALIFORNIA
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ONE HUNDRED ELEVENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON ENERGY AND COMMERCE
2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6115

Majority (202) 225–2927
Minority (202) 225–3641

April 13, 2010

Stanley K. Chang
CEO
Meyer Corporation
One Meyer Plaza
Vallejo, CA 94590

Dear Mr. Chang:

I am writing to you to because your company makes products, such as Faberware knives and cutting boards, which contain Microban, a trademarked chemical formulation that sometimes uses the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, handwashes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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[1] Reiss, R., N. Mackay, C. Habig, and J. Griffin. 2002. *An ecological risk assessment for triclosan in lotic systems following discharge from wastewater treatment plants in the United States.* Environmental Toxicology and Chemistry, 21(11): 2483-2492.

[2] Beyond Pesticides *The Ubiquitous Triclosan*, Aviva Glaser(beyondpesticides.org) Vol. 24, No. 3, 2004 Examples of soaps containing triclosan are: Dial® Liquid Soap; Softsoap® Antibacterial Liquid Hand Soap, CVS Antibacterial Soap, Dawn® Complete Antibacterial Dish Liquid, Ajax® Antibacterial Dish Liquid; In June 2009, FDA warned against marketing fraudulent virus claims: (online at http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm166801.html (Jun 15, 2009).

Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over

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[4] Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

[5] Rolf U. Halden and Daniel H. Paull. 2005. *Co-Occurrence of Triclocarban and Triclosan in U.S. Water Resources.* Environmental Science and Technology, 39(6):1420–1426.

[6] Calafat AM, Ye X, Wong LY, Reidy JA, Needham LL. 2008. Urinary concentrations of triclosan in the U.S. population: 2003-2004. Environmental Health Perspectives, 116(3):303-7.

[7] April 8, 2010: Food and Drug Administration, *Triclosan: What Consumers Should Know* (April 8, 2010) (online at http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm205999.htm); previous announcement in 2005; WebMD, FDA Panel: No Advantage to Antibacterial Soap, October 20, 2005 (online at http://www.webmd.com/news/20051020/fda-panel-no-advantage-to-antibacterial-soap

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Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate.".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Meyer Corporation voluntarily cease making and marketing any food contact products, such as Faberware Microban knives and cutting boards, other products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents alone or as a part of the Microban formulation. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I would also respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is,

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[9] See, for example, Kumar V, Chakraborty A, Kural MR, Roy P. 2009. *Alteration of testicular steroidogenesis and histopathology of reproductive system in male rats treated with triclosan.* Reproductive Toxicology 27(2):177-85 and Kevin M. Crofton, Katie B. Paul, Michael J. DeVito, Joan M. Hedge. 2007. *Short-term in vivo exposure to the water contaminant triclosan: Evidence for disruption of thyroxine.* Environmental Toxicology and Pharmacology, 24:194–197.

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[12] Id.

in fact, willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
Subcommittee on Energy and Environment

HENRY A. WAXMAN, CALIFORNIA
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ONE HUNDRED ELEVENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON ENERGY AND COMMERCE
2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6115

Majority (202) 225–2927
Minority (202) 225–3641

April 13, 2010

Alan G. Lafley
CEO and President
Proctor & Gamble
One Proctor & Gamble Plaza
Cincinnati, OH 45202

Dear Mr. Lafley:

I am writing to you to because your company makes products such as Dawn dishwashing liquid, Zest soaps and Softsoap which contain the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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[2] Beyond Pesticides *The Ubiquitous Triclosan*, Aviva Glaser(beyondpesticides.org) Vol. 24, No. 3, 2004 Examples of soaps containing triclosan are: Dial® Liquid Soap; Softsoap® Antibacterial Liquid Hand Soap, CVS Antibacterial Soap, Dawn® Complete Antibacterial Dish Liquid, Ajax® Antibacterial Dish Liquid; In June 2009, FDA warned against marketing fraudulent virus claims: http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm166801.html (Jun 15, 2009)

Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

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[4] Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

[5] Rolf U. Halden and Daniel H. Paull. 2005. *Co-Occurrence of Triclocarban and Triclosan in U.S. Water Resources.* Environmental Science and Technology, 39(6):1420–1426.

[6] Calafat AM, Ye X, Wong LY, Reidy JA, Needham LL. 2008. *Urinary concentrations of triclosan in the U.S. population: 2003-2004.* Environmental Health Perspectives, 116(3):303-7.

[7] April 8, 2010: Food and Drug Administration, *Triclosan: What Consumers Should Know* (April 8, 2010) (online at http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm205999.htm); previous announcement in 2005; WebMD, FDA Panel: No Advantage to Antibacterial Soap, October 20, 2005 (online at http://www.webmd.com/news/20051020/fda-panel-no-advantage-to-antibacterial-soap).

[8] See for example: Aiello AE, Larson EL, Levy SB. 2007. *Consumer antibacterial soaps: effective or just risky?* Clinical Infectious Diseases, 45:S137–S147.

sustained periods of time.[9] The Environmental Protection Agency (EPA) has concluded from animal studies that triclosan disrupts thyroid hormone levels, which is important for brain development.[10] In addition, studies by the EPA also indicate that triclosan has the potential to affect the estrogen system. While triclocarban is a lesser studied compound, it has been shown in laboratory studies to interfere with normal testosterone action.[11] In evaluating all of the endocrine disruption data for triclosan and triclocarban FDA has also concluded "that existing data of triclosan raise valid concerns about the effects of repetitive daily human exposure to these antiseptic ingredients."[12]

Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate.".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Proctor and Gamble voluntarily cease making and marketing hand soaps, dish detergent and other consumer soaps, such as Dawn dishwashing liquid, Zest soaps and Softsoap, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I would also respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is,

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[9] See, for example, Kumar V, Chakraborty A, Kural MR, Roy P. 2009. *Alteration of testicular steroidogenesis and histopathology of reproductive system in male rats treated with triclosan.* Reproductive Toxicology 27(2):177-85 and Kevin M. Crofton, Katie B. Paul, Michael J. DeVito, Joan M. Hedge. 2007. *Short-term in vivo exposure to the water contaminant triclosan: Evidence for disruption of thyroxine.* Environmental Toxicology and Pharmacology, 24:194–197.

[10] Letter from Assistant Administrator Stephen A. Owens, EPA Office of Prevention, Pesticides and Toxic Substances to Subcommittee Chairman Edward J. Markey, (March 5, 2010) (online at http://markey.house.gov/docs/epatriclosanresponse.pdf).

[11] Letter from FDA Assistant Commissioner of Legislation Jeanne Ireland to Subcommittee Chairman Edward J. Markey (February 23, 2010) (online at http://markey.house.gov/docs/fdatriclosanresponsereducœd.pdf).

[12] Id.

in fact, willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
Subcommittee on Energy and Environment

HENRY A. WAXMAN, CALIFORNIA
CHAIRMAN

JOE BARTON, TEXAS
RANKING MEMBER

ONE HUNDRED ELEVENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON ENERGY AND COMMERCE

2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6115

Majority (202) 225–2927
Minority (202) 225–3641

April 13, 2010

Tae Y. Chang
President
Highel Inc.
199 Technology Drive
Irvine, CA 92618-2451
Fax: 949-753-8601

Dear Mr. Chang:

I am writing to you to because your company makes products, such as cutting boards, which contain Microban, a trademarked chemical formulation that sometimes uses the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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[1] Reiss, R., N. Mackay, C. Habig, and J. Griffin. 2002. *An ecological risk assessment for triclosan in lotic systems following discharge from wastewater treatment plants in the United States.* Environmental Toxicology and Chemistry, 21(11): 2483-2492.

[2] Beyond Pesticides *The Ubiquitous Triclosan*, Aviva Glaser(beyondpesticides.org) Vol. 24, No. 3, 2004 Examples of soaps containing triclosan are: Dial® Liquid Soap; Softsoap® Antibacterial Liquid Hand Soap, CVS Antibacterial Soap, Dawn® Complete Antibacterial Dish Liquid, Ajax® Antibacterial Dish Liquid; In June 2009, FDA warned against marketing fraudulent virus claims: http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm166801.html (Jun 15, 2009)

Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over

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[3] Heidler J, Sapkota A, Halden RU.2006. *Partitioning, Persistence, and Accumulation in Digested Sludge of the Topical Antiseptic Triclocarban during Wastewater Treatment.* Environmental Science and Technology, 40(11):3634-9.

[4] Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

[5] Rolf U. Halden and Daniel H. Paull. 2005. *Co-Occurrence of Triclocarban and Triclosan in U.S. Water Resources.* Environmental Science and Technology, 39(6):1420–1426.

[6] Calafat AM, Ye X, Wong LY, Reidy JA, Needham LL. 2008. Urinary concentrations of triclosan in the U.S. population: 2003-2004. Environmental Health Perspectives, 116(3):303-7.

[7] April 8, 2010: Food and Drug Administration, *Triclosan: What Consumers Should Know* (April 8, 2010) (online at http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm205999.htm); previous announcement in 2005; WebMD, FDA Panel: No Advantage to Antibacterial Soap, October 20, 2005 (online at http://www.webmd.com/news/20051020/fda-panel-no-advantage-to-antibacterial-soap).

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sustained periods of time.[9] The Environmental Protection Agency (EPA) has concluded from animal studies that triclosan disrupts thyroid hormone levels, which is important for brain development.[10] In addition, studies by the EPA also indicate that triclosan has the potential to affect the estrogen system. While triclocarban is a lesser studied compound, it has been shown in laboratory studies to interfere with normal testosterone action.[11] In evaluating all of the endocrine disruption data for triclosan and triclocarban FDA has also concluded "that existing data of triclosan raise valid concerns about the effects of repetitive daily human exposure to these antiseptic ingredients."[12]

Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Highel voluntarily cease making and marketing cutting boards, hand gel, washes and soaps, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents alone or as a part of the Microban formulation. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact,

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[9] See, for example, Kumar V, Chakraborty A, Kural MR, Roy P. 2009. *Alteration of testicular steroidogenesis and histopathology of reproductive system in male rats treated with triclosan.* Reproductive Toxicology 27(2):177-85 and Kevin M. Crofton, Katie B. Paul , Michael J. DeVito, Joan M. Hedge. 2007. *Short-term in vivo exposure to the water contaminant triclosan: Evidence for disruption of thyroxine.* Environmental Toxicology and Pharmacology, 24:194–197.

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[12] Id.

willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
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HENRY A. WAXMAN, CALIFORNIA
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ONE HUNDRED ELEVENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON ENERGY AND COMMERCE
2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6115

Majority (202) 225–2927
Minority (202) 225–3641

April 13, 2010

William Mordan
Vice President and General Counsel
Reckitt Benckiser Inc.
399 Interpace Pkwy.
Parsippany, NJ 07054

Dear Mr. Mordan:

I am writing to you to because your company makes products, such as Clean and Smooth Kitchen Antibacterial Liquid Hand Soap, which contain the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over

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[4] Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

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[6] Calafat AM, Ye X, Wong LY, Reidy JA, Needham LL. 2008. *Urinary concentrations of triclosan in the U.S. population: 2003-2004.* Environmental Health Perspectives, 116(3):303-7.

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Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate.".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Home Solution voluntarily cease making and marketing hand gel, washes and soaps, such as Clean and Smooth Kitchen Antibacterial Liquid Hand Soap, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I would also respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is,

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in fact, willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
Subcommittee on Energy and Environment

HENRY A. WAXMAN, CALIFORNIA
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ONE HUNDRED ELEVENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON ENERGY AND COMMERCE

2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6115

Majority (202) 225-2927
Minority (202) 225-3641

April 13, 2010

J. Merrick Taggart
President and CEO
Victorinox Swiss Army, Inc.
7 Victoria Drive
Monroe, CT 06468-1212
Fax: 203-929-3786

Dear Mr. Taggart:

I am writing to you to because your company makes products, such as knives, which contain Microban, a trademarked chemical formulation that sometimes uses the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

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In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Victorinox voluntarily cease making and marketing knives, hand gel, washes and soaps, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents alone or as a part of the Microban formulation. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact,

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Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

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Ranking Member

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Ranking Member
Subcommittee on Energy and Environment

HENRY A. WAXMAN, CALIFORNIA
CHAIRMAN

JOE BARTON, TEXAS
RANKING MEMBER

ONE HUNDRED ELEVENTH CONGRESS

Congress of the United States

House of Representatives

COMMITTEE ON ENERGY AND COMMERCE
2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6115

Majority (202) 225–2927
Minority (202) 225–3641

April 13, 2010

Mitchell Lynn
President
Early Childhood Resources
820 E Gate Drive
Mount Laurel, NJ
08054-1209

Dear Mr. Lynn:

I am writing to you to because your company makes products, such as such as school Rest Cots, Resin Chairs & Tables, Wooden Classroom Furniture and Soft Play Environments, which contain Microban, a trademarked chemical formulation that sometimes uses the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, handwashes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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[1] Reiss, R., N. Mackay, C. Habig, and J. Griffin. 2002. *An ecological risk assessment for triclosan in lotic systems following discharge from wastewater treatment plants in the United States.* Environmental Toxicology and Chemistry, 21(11): 2483-2492.

[2] Beyond Pesticides *The Ubiquitous Triclosan*, Aviva Glaser(beyondpesticides.org) Vol. 24, No. 3, 2004 Examples of soaps containing triclosan are: Dial® Liquid Soap; Softsoap® Antibacterial Liquid Hand Soap, CVS Antibacterial Soap, Dawn® Complete Antibacterial Dish Liquid, Ajax® Antibacterial Dish Liquid; In June 2009, FDA warned against marketing fraudulent virus claims: (online at http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm166801.html (Jun 15, 2009)

Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over

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[3] Heidler J, Sapkota A, Halden RU.2006. *Partitioning, Persistence, and Accumulation in Digested Sludge of the Topical Antiseptic Triclocarban during Wastewater Treatment.* Environmental Science and Technology, 40(11):3634-9.

[4] Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

[5] Rolf U. Halden and Daniel H. Paull. 2005. *Co-Occurrence of Triclocarban and Triclosan in U.S. Water Resources.* Environmental Science and Technology, 39(6):1420–1426.

[6] Calafat AM, Ye X, Wong LY, Reidy JA, Needham LL. 2008. *Urinary concentrations of triclosan in the U.S. population: 2003-2004.* Environmental Health Perspectives, 116(3):303-7.

[7] April 8, 2010: Food and Drug Administration, *Triclosan: What Consumers Should Know* (April 8, 2010) (online at http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm205999.htm); previous announcement in 2005; WebMD, FDA Panel: No Advantage to Antibacterial Soap, October 20, 2005 (online at http://www.webmd.com/news/20051020/fda-panel-no-advantage-to-antibacterial-soap).

[8] See for example: Aiello AE, Larson EL, Levy SB. 2007. *Consumer antibacterial soaps: effective or just risky?* Clinical Infectious Diseases, 45:S137–S147.

sustained periods of time.[9] The Environmental Protection Agency (EPA) has concluded from animal studies that triclosan disrupts thyroid hormone levels, which is important for brain development.[10] In addition, studies by the EPA also indicate that triclosan has the potential to affect the estrogen system. While triclocarban is a lesser studied compound, it has been shown in laboratory studies to interfere with normal testosterone action.[11] In evaluating all of the endocrine disruption data for triclosan and triclocarban FDA has also concluded "that existing data of triclosan raise valid concerns about the effects of repetitive daily human exposure to these antiseptic ingredients."[12]

Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Early Childhood Resources voluntarily cease making and marketing school Rest Cots, Resin Chairs & Tables, Wooden Classroom Furniture and Soft Play Environments, hand gel, washes and soaps, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents alone or as a part of the Microban formulation. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

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[9] See, for example, Kumar V, Chakraborty A, Kural MR, Roy P. 2009. *Alteration of testicular steroidogenesis and histopathology of reproductive system in male rats treated with triclosan.* Reproductive Toxicology 27(2):177-85 and Kevin M. Crofton, Katie B. Paul , Michael J. DeVito, Joan M. Hedge. 2007. *Short-term in vivo exposure to the water contaminant triclosan: Evidence for disruption of thyroxine.* Environmental Toxicology and Pharmacology, 24:194–197.

[10] Letter from Assistant Administrator Stephen A. Owens, EPA Office of Prevention, Pesticides and Toxic Substances to Subcommittee Chairman Edward J. Markey, (March 5, 2010) (online at http://markey.house.gov/docs/epatriclosanresponse.pdf).

[11] Letter from FDA Assistant Commissioner of Legislation Jeanne Ireland to Subcommittee Chairman Edward J. Markey (February 23, 2010) (online at http://markey.house.gov/docs/fdatriclosanresponsereduced.pdf).

[12] Id.

Thank you for your consideration of this request. I respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact, willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
Subcommittee on Energy and Environment

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WASHINGTON, DC 20515–6115

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Minority (202) 225–3641

April 13, 2010

Walter C. Johnsen
Chairman and CEO
Acme United Corporation
60 Round Hill Road
Fairfield, CT 06824

Dear Mr. Johnsen:

I am writing to you to because your company makes products, Clauss Titanium Bonded™ knives, which contain Microban, a trademarked chemical formulation that sometimes uses the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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[2] Beyond Pesticides *The Ubiquitous Triclosan*, Aviva Glaser(beyondpesticides.org) Vol. 24, No. 3, 2004 Examples of soaps containing triclosan are: Dial® Liquid Soap; Softsoap® Antibacterial Liquid Hand Soap, CVS Antibacterial Soap, Dawn® Complete Antibacterial Dish Liquid, Ajax® Antibacterial Dish Liquid; In June 2009, FDA warned against marketing fraudulent virus claims: http://www.fda.gov/NewsEvents/Newsroom/PressAnnouncements/ucm166801.html (Jun 15, 2009).

Since wastewater treatment plants are not required to remove triclosan from the water and since this chemical is highly stable for long periods of time, it is reasonably expected that people could be further exposed to triclosan by drinking contaminated water. In fact, a 2006 study by the Johns Hopkins Bloomberg School of Public Health found that about 75 percent of triclosan makes it through water treatment methods, ending up in our surface water and in municipal sludge. This municipal sewage sludge is routinely applied to U.S crop fields as a fertilizer[3] and has very high concentrations of triclosan and triclocarban, which due to chemical stability have the ability to resist degradation for decades.[4] Additionally, a U.S. Geological Survey (USGS) report found that between 1999 and 2000, triclosan was found in nearly 60% of U.S. streams.[5] This means there is a potential risk of these chemicals accumulating in both our drinking water and our foods. This risk is demonstrated by a recent study by the Centers for Disease Control and Prevention (CDC), which found triclosan in the urine of 75% of Americans, including children.[6]

Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

Moreover, recent scientific evidence suggests that triclosan and triclocarban may act as endocrine disruptors causing adverse health effects on the endocrine system when used over

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[4] Environmental Protection Agency, *Targeted National Sewage Sludge Survey Sampling and Analysis Technical Report*, (January 2009) (EPA-822-R-08-016) (online at http://www.epa.gov/waterscience/biosolids/tnsss-tech.pdf).

[5] Rolf U. Halden and Daniel H. Paull. 2005. *Co-Occurrence of Triclocarban and Triclosan in U.S. Water Resources.* Environmental Science and Technology, 39(6):1420–1426.

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[7] April 8, 2010: Food and Drug Administration, *Triclosan: What Consumers Should Know* (April 8, 2010) (online at http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm205999.htm); previous announcement in 2005; WebMD, FDA Panel: No Advantage to Antibacterial Soap, October 20, 2005 (online at http://www.webmd.com/news/20051020/fda-panel-no-advantage-to-antibacterial-soap).

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sustained periods of time.[9] The Environmental Protection Agency (EPA) has concluded from animal studies that triclosan disrupts thyroid hormone levels, which is important for brain development.[10] In addition, studies by the EPA also indicate that triclosan has the potential to affect the estrogen system. While triclocarban is a lesser studied compound, it has been shown in laboratory studies to interfere with normal testosterone action.[11] In evaluating all of the endocrine disruption data for triclosan and triclocarban FDA has also concluded "that existing data of triclosan raise valid concerns about the effects of repetitive daily human exposure to these antiseptic ingredients."[12]

Concerns about triclosan are also shared by other countries including Japan, Canada, Germany and other members of the European Union that have all issued regulations or warnings that act to limit human exposure to triclosan from cosmetics and other personal care products. Furthermore, on March 19, 2010 the European Union acted to prohibit the use of triclosan in products that are intended to come into contact with food noting that the manufacturer of the chemical (CIBA/BASF) found its use in food contact products no longer "appropriate".

In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Acme United Corporation voluntarily cease making and marketing Clauss Titanium Bonded™ knives, hand gel, washes and soaps, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents alone or as a part of the Microban formulation. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact,

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[12] Id.

willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
Subcommittee on Energy and Environment

cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
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2125 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6115

Majority (202) 225-2927
Minority (202) 225-3641

April 13, 2010

Michael Silberstein
CEO
Infantino, LLC
4920 Carroll Canyon Road, Suite 200
San Diego, CA 92121
Fax: 858-457-0181

Dear Mr. Silberstein:

I am writing to you to because your company makes products, including cart covers and baby carriers, which contain Microban, a trademarked chemical formulation that sometimes uses the antimicrobial chemical triclosan. I request that you halt further use of this chemical in any consumer soaps, products intended to come into contact with food and products marketed specifically to children, in light of the serious concerns that have been raised about the use of this chemical in products that come into contact with food, products that are marketed to children and in everyday consumer soaps in which it is no more effective than plain soap and water.

As you may know, triclosan was originally introduced in the healthcare setting as a surgical scrub, but over the last decade there has been a rapid increase in the use of both triclosan, and a related compound triclocarban, in a number of consumer products including soaps, hand washes, toothpaste, shave gels, kitchenware, clothes, and toys. Over 95% of the uses of these antimicrobial agents are in consumer products that are disposed of in residential drains.[1] This is of particular concern in today's health climate in which these "antibacterial" products are extensively used by healthy individuals as a safeguard against the H1N1 and seasonal flu viruses, even though they are useless for that purpose.[2]

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Despite widespread use, there is little data to prove that products containing triclosan and triclocarban are any more effective in protecting against disease transmission than using regular soap and water with proper hand-washing techniques. In fact, consumer guidance provided by the FDA on April 8, 2010 stated that triclosan added to soaps and body washes provide no more health benefits than plain soap and water.[7] There is also scientific evidence that suggests use of triclosan and other antimicrobial agents may increase widespread antibiotic resistance[8], which could make serious illnesses less easily treated with antibiotics.

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In light of recent statements by the FDA and the EPA that express concerns over the potential health effects of triclosan and triclocarban, statements from both the FDA and American Medical Association about the ineffectiveness of the these chemicals when compared to regular soap and water, as well as growing concern about the potential for these common uses of antimicrobials to contribute to bacterial resistance which has led to restrictions or warnings about the use of triclosan in numerous other countries, I am requesting that Infantino voluntarily cease making and marketing cart covers and baby carriers, hand gel, washes and soaps, products intended to come into contact with food and products marketed specifically to children that contain these antimicrobial agents alone or as a part of the Microban formulation. I believe that such a step would demonstrate your companies' commitment to the health and well-being of your consumers, as well as to the environment.

Thank you for your consideration of this request. I respectfully ask that you respond to this request in writing by Friday May 7, 2010, and indicate whether your company is, in fact,

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willing to undertake such a voluntary action. If you have any questions or concerns, you may contact Dr. Avenel Joseph or Dr. Michal Freedhoff of my staff at 202-225-2836.

Sincerely,

Edward J. Markey
Chairman
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cc: The Honorable Henry A. Waxman
Chairman

The Honorable Joe Barton
Ranking Member

The Honorable Fred Upton
Ranking Member
Subcommittee on Energy and Environment