



December 1, 2009

The Honorable James Moran
U.S. House of Representative
2239 Rayburn House Office Building
Washington, DC 20515

Dear Representative Moran:

The Endocrine Society applauds your introduction of the “Endocrine Disruption Prevention Act of 2009”. The Society strongly endorses this important legislation and thanks you for your leadership on the issue of endocrine-disrupting chemicals (EDCs). The Endocrine Society is the world's largest and most active professional organization of endocrinologists representing over 14,000 members worldwide. We are dedicated to quality research, patient care, and education. Endocrine research continues to identify health effects of EDCs and their underlying biological mechanisms. Endocrinologists are uniquely qualified to design and interpret studies that clearly delineate these issues.

In our recently released report, *Endocrine Disrupting Chemicals: An Endocrine Society Scientific Statement*, the Society presents the evidence that endocrine disruptors have effects on male and female reproduction, breast development and cancer, prostate cancer, neuroendocrine physiology, thyroid function, metabolism and obesity, and cardiovascular endocrinology. The Endocrine Society makes a number of recommendations designed to increase understanding of effects of EDCs, including enhancing increased basic and clinical research, invoking the precautionary principle, and advocating involvement of individual and scientific society stakeholders in communicating and implementing changes in public policy and awareness. The “Endocrine Disruption Prevention Act” is entirely in line with the Society’s positions and will advance endocrine science in the field of EDCs and will improve the regulatory process by ensuring it is informed by the best science.

While the Society supports the current version of the bill, we offer the following suggestions to ensure that the research program and scientific panel are as comprehensive as possible and to provide greater regulatory authority to relevant federal agencies.

Comprehensive research program and scientific panel:

In SEC. 463C(b)(1)(B-F), the bill defines the health outcomes and other considerations to be examined by the research program. One very important aspect of EDCs to emerge in recent years is the identification of effects that become apparent in descendants of the exposed individual (transgenerational effects). Thus, we recommend that the examination of transgenerational effects be added to this section as a research requirement.

In SEC.463C(c)(2)(C), the bill requires that the scientific panel comprise representatives from “diverse disciplines, including developmental biology, endocrinology, developmental and neurological biology, embryology, biochemistry, physiology, epidemiology, endocrine driven oncology, and medical research.” While all of these viewpoints would be valuable, endocrinology cannot be adequately represented by any single individual. Endocrinology incorporates many highly focused areas of expertise, and it is critical that the panel include researchers with deep understanding of the myriad endocrine mechanisms involved. Therefore, we recommend the above language be revised to include the italicized additions below:

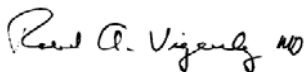
“...diverse disciplines, including developmental biology, endocrinology—*including but not limited to individuals with expertise in studying the basic biology of hormone actions in the reproductive system, the thyroid system, the cardiovascular system, obesity, diabetes, and metabolism*—developmental and neurological biology, embryology, biochemistry, physiology, epidemiology, endocrine driven oncology, and medical research.”

Greater regulatory authority:

Under SEC. 4. FEDERAL AGENCY ACTION, we would recommend the addition of a subsection requiring stronger action on the part of regulatory agencies if the Panel finds a tier 4 or tier 5 level of concern. Such a finding should result in the identification of the chemical in question as presenting an unreasonable risk, or as being unsafe, and regulatory agencies should be required to take appropriate action to restrict human exposure to the chemical.

Thank you, Representative Moran, for recognizing the need for stronger regulation of EDCs. We fully support your efforts to address the potentially detrimental effect of these chemicals on the health of Americans and strongly endorse the “Endocrine Disruption Prevention Act.” If we can be of assistance to you in any way, please contact Stephanie Kutler, Director of Government Affairs, at skutler@endo-society.org or 301-941-0254.

Sincerely,



Robert Vigersky, MD
President
The Endocrine Society