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Strengthening Public Health:
Protecting Against Toxic Chemicals

Environment and Public Works Committee

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Good Morning. I would like to thank Chairwoman Boxer, Ranking Member Vitter and the members of the Committee for this opportunity to testify at today's important hearing.

The Breast Cancer Fund is the only national organization focused solely on preventing breast cancer. We do that by eliminating our exposures to toxic chemicals and radiation linked to the disease. Reform of the outdated and ineffective Toxic Substances Control Act (TSCA) has long been a priority of our organization. For the last four years, the Breast Cancer Fund has served on the Steering Committee of Safer Chemicals, Healthy Families, a coalition of over 450 organizations working to reform TSCA, including health professionals, health affected groups, environmental justice organizations, environmental groups and businesses.

We have all been touched by breast cancer, either personally or through a family member or friend. Despite all of our advances in detection and treatment, we have not been able to stem the tide – the tidal wave – of women, and men, diagnosed with this devastating disease. In fact, we are losing ground: today 1 in 8 women in the United States will be diagnosed with breast cancer in her lifetime. This represents a 40 percent increase over the risk women faced in 1973. Globally, breast cancer affects more women than any other type of cancer. In 2013 about 232,340 women and 2240 men in the United States will be diagnosed with breast cancer. 40,000 women die each year.ⁱ We know that most people with breast cancer have no family history and only 5 to 10 percent can be traced back to inherited genetic factors including the “breast cancer genes,” or BRCA1 and BRCA2. While they account for a relatively small percentage of cases, the risk for those with these genes has also increased dramatically over the past decades. Today, women with one of the BRCA genes have a staggering 87 percent chance of being diagnosed with breast cancer; a number that is triple the risk faced by women born before 1940. Genes do not change that quickly, but environmental factors do.

I am here today on behalf of the three million women and men living with breast cancer todayⁱⁱ, the millions we have lost, and the millions who have yet to be diagnosed in the hope that the actions taken by the Committee and the Congress can reduce those numbers in the future. We look to this Committee and the Senate as a whole to show the leadership and courage to pass meaningful, strong and effective reform of the Toxic Substances Control Act (TSCA). We are heartened that this conversation has shifted from “is reform necessary?” to “what should reform look like?” This is a significant step forward. Now we all must focus on creating legislation that truly protects public health and especially the most vulnerable among us.

Most Americans assume that the industrial chemicals used in the United States have been tested for safety. Sadly, this is not the case. In our daily lives we are exposed to hundreds, perhaps even thousands, of chemicals from a wide range of sources, including cleaning and personal care products, plastics, children's toys, furniture, food, air, water, our workplaces and our neighborhoods. A strong and rapidly growing body of evidence is showing that some of those chemicals are toxic and can increase our risk for breast cancer and a number of other diseases and conditions, from asthma and learning disabilities to prostate cancer and infertility. The Toxic Substances Control Act (TSCA) has utterly failed to protect the American public from these toxic chemicals, which are contributing to a worsening public health crisis of chronic diseases.

In talking about the intricacies of federal chemical policy, we sometimes lose track of the real-life impacts of these chemicals. The child with a learning disability. The young couple struggling to conceive a child. The women – and men – who have faced the life-changing impact of a breast cancer diagnosis. I want to bring those people and those voices into the room and our discussion

today – the faces of your mothers and fathers and daughters and sons – and remind us that what we do, or don't do, to ensure that new and existing chemicals used in commerce are safe will have a direct impact on them and on future generations.

The Science

Researchers have long known that genetic and environmental factors individually contribute and interact with each other to increase breast cancer risk. Studies show that breast cancer rates can vary with environmental circumstances. The good news is that environmental factors, including chemical exposures, are more readily modified than genetic factorsⁱⁱⁱ and therefore present a tremendous opportunity to reduce the risk of and prevent breast cancer, if we have the wisdom and political courage to reduce our exposures.

Chemicals can impact and interfere with our bodies in a number of ways. Some chemicals, called mutagens, actually change the DNA of our cells. Some do not change the DNA, but rather interfere with how the genes are expressed through a process called epigenetics. Both of these alterations can be passed down to the next generation, increasing our children's risk of adverse health impacts. Chemicals can also act as carcinogens through effects on the cell cycle and other mechanisms. Two of the leading authoritative lists of carcinogens come from the World Health Organization's International Agency on Research for Cancer, or IARC, and the U.S. National Toxicology Program, or NTP, an interagency program housed at the National Institute of Environmental Health Sciences (NIEHS). Both programs maintain and update lists of chemicals identified as carcinogens, many of which remain in commerce, and often in consumer products as well as our air, water, soil, etc.

Another class of chemicals causing increased concern for breast cancer and numerous other diseases are called endocrine-disrupting compounds or EDCs. These substances behave like our body's natural hormones and can interfere with the very sensitive and critical endocrine system that controls our development and homeostasis. This interference can happen in a number of ways, including mimicking the body's own hormones or blocking their actions. EDCs, especially chemicals that mimic estrogen, are particularly concerning for breast cancer, because increased lifetime exposure to estrogen is a known risk factor. EDCs can also interfere with the thyroid system, which regulates metabolism and reproductive health. EDCs can also impact men by increasing the risk of diseases and conditions such as prostate cancer and male genital deformities. While more needs to be known about EDCs, without strong testing requirements in TSCA we will continue to be exposed to these chemicals without regard for their impacts.

The Breast Cancer Fund bases all of our work in a strong foundation of science. We review the peer-reviewed scientific literature related to breast cancer and the environment and compile the information in an accessible way. Over the past 12 years, we have issued 6 editions of our report entitled *State of the Evidence: The Connection Between Breast Cancer and the Environment*. With the ever evolving nature of the science, we now provide the most updated information on our website's "Clear Science" section (www.breastcancerfund.org). The existing and emerging science points to a number of themes:

Low doses matter: For many years it was believed that the risk from harmful chemicals was directly proportional to the amount of exposure – that the dose made the poison. But scientific

evidence now shows that some chemicals, especially those that disrupt our endocrine system, can exert negative effects at extremely low exposure levels – sometimes with more serious or different effects than at higher doses. It is essential that low-doses exposure be taken into account when testing chemicals for health effects and when regulating chemical exposures. Some chemicals — can have a more profound impact at lower exposure levels.

Chemical mixtures matter: We are exposed to a bewildering variety of chemicals every day, and we may be exposed to a single chemical from a variety of different pathways. And while we lack adequate information about the health effects of exposures to individual chemicals, we know even less about how chemicals act together to increase risk for diseases, including breast cancer. Evaluating the total exposure to single chemicals and the mix of chemicals people are exposed to every day would provide a missing piece of the puzzle in understanding environmental links to breast cancer.

Your occupation and where you live matters: While all of us are exposed to chemicals all around us, those on the front line, either as workers or living in communities next to chemical plants or other sources of chemical exposures, are even more at risk for increased risk of breast cancer or other diseases.

Workers often suffer the highest exposures to chemicals and are the “canary in the coal mine” for the dangers of exposures to the broader population. As just one example, a recent Canadian study discovered that the women who work in automotive plastics and food-canning have a staggering fivefold increase in pre-menopausal breast cancer as compared to similarly situated women in other occupations.^{iv} These workers are exposed to endocrine-disrupting compounds in plastics, such as phthalates and bisphenol A, or toxic flame retardants called polybrominated diphenyl ethers (PBDEs), which are commonly used in the interiors of cars.

Fenceline communities, those living next to chemical plants, incinerators, Superfund sites or other sources of chemical exposures, are another vulnerable population that should be considered and protected when evaluating the safety of chemicals. While white women have the highest overall breast cancer rates, a greater proportion of African American women are diagnosed with breast cancer before age 45,^{v,vi} and they are more likely to die from the disease than any other racial or ethnic group.^{vii} For breast cancer specifically, we know that the levels of chemicals related to breast cancer in people’s bodies can vary by race, ethnicity and socioeconomic status. As a group, African Americans have higher levels than whites or Mexican Americans of many chemicals, including PCBs, mercury, lead, PAHs, dioxin and phthalates.^{viii,ix} Mexican Americans as a group have higher levels of the pesticides DDT/DDE and 2,3,5,TCP.^x African Americans, as well as people with less formal education and people with lower socioeconomic status, are more likely to live within a mile of a polluting facility, such as a chemical plant.^{xi}

Timing of exposure matters. The timing of exposure is a particularly important aspect of chemical exposures. The stage of life at which you are exposed to a chemical matters – a lot. Developing bodies are more sensitive to some chemical exposures, and the body’s ability to protect itself is not fully mature. A level of exposure that might not seriously impact adults could have disastrous effects on long-term health when the exposure is in utero. Particularly sensitive stages of life, referred to as windows of susceptibility, include prenatal development, early childhood, puberty, pregnancy and lactation.

Developmental stages, times of rapid growth and differentiation are delicately orchestrated by the body’s chemical messaging system, the endocrine system. These windows of susceptibility

provide an opportunity for chemicals to exert greater harm – harm that is sometimes not fully realized until years or decades later and can have profound impacts on later-life risk of breast cancer and many other diseases. More and more science shows that prenatal and early life exposures are the most concerning for a vast array of health outcomes from various cancers to diabetes.

For breast cancer the situation is even more complex than just looking at very early exposures. Unlike most organs of the body, breasts are not fully developed until adulthood, specifically a woman's first full-term pregnancy. In utero development, infancy, puberty, pregnancy and lactation are all stages during which breast tissue is developing and differentiating. Each of these stages provides an opportunity for chemicals to interfere with and disrupt these extremely sensitive processes. One of the disturbing trends in childhood development is the falling age of puberty. While the average age of first menarche has fallen by a few months relative to 40 years ago, most significantly girls' breasts are developing one to two years earlier. Evidence points to environmental chemicals, particularly endocrine disrupting compounds, as one of the culprits in this trend.^{xii} Early puberty is one of the risk factors for later life breast cancer. The impact of that disruption early in life can stay with a child through adulthood, sometimes manifesting decades later. The scientific understanding of these processes is evolving quickly, but more research and data are needed, particularly on chemical impacts that might be shaping this pattern.

We urgently need to accelerate progress toward understanding the role of these environmental chemicals. In the face of scientific uncertainty, however, we cannot wait to act. We must prioritize protecting public health and investing in safer alternatives, while intensifying the study of how chemicals impact our health. That can only be accomplished with the full force of a strong chemical management system and an EPA empowered and funded to do the job.

The Failings of the 1976 TSCA

Numbers effectively tell the story of our failed chemical policy: Of the over 84,000 chemicals on the TSCA inventory, 62,000 were grandfathered in when the law passed in 1976, meaning chemical companies could keep selling them without safety testing. And in the 35 years since TSCA became law, the Environmental Protection Agency (EPA) has been able to require testing for only a few hundred of the grandfathered chemicals. Perhaps most striking, only five chemicals overall have been restricted. In fact, TSCA makes it so difficult to regulate a chemical that the EPA has not even been able to ban asbestos, a well-established human carcinogen.

The TSCA framework and requirements tie the EPA's hands in a number of ways, resulting in a regulatory system that fails to protect the public's health. Among those issues are:

Lack of Safety Data – To make sound decisions about the safety of a chemical, EPA needs adequate information on a range of possible health impacts. Unfortunately, TSCA makes it extremely hard for EPA to get that necessary safety data by placing the burden on the EPA to show they need the information rather than on the industry to show their chemical is safe.

For existing chemicals, EPA is in a Catch 22 of having to show that a chemical poses an unreasonable risk of injury to health or the environment before the agency can require testing to find out if the chemical actually poses such a risk. Even once the agency has gone through the costly and time-consuming process of obtaining the necessary data showing the risk, they must go through a lengthy rule-making process to get the additional data from the manufacturer.

For new chemicals, EPA has 90 days to review the chemical before it goes into production, but it cannot compel manufacturers to submit any safety data and very few companies do so voluntarily. This leaves EPA reliant on sometimes incomplete or imperfect models to predict the toxicity of a chemical based on similarities to other chemicals that have been tested for safety. And if the EPA fails to act, the chemical goes onto the market at the end of the review period.

Confidential Business Information – Much of the limited data that the EPA receives is designated by the chemical companies as confidential business information, or CBI. A CBI designation prohibits the EPA from sharing the information with the public, or even with state and local health and environmental agencies. The public has a right to know what chemicals they are being exposed to and states often want this information to assist them with emergency planning and alerting emergency response personnel about potential threats from toxic chemicals in local manufacturing facilities. Ironically, while available safety data cannot be designated as CBI, the identity of the chemical associated with that safety data can be withheld. EPA estimates that in about 95 percent of new chemical notices, manufacturers claim some portion of that submission as CBI. While EPA has recently stepped up its efforts to require manufacturers to better justify their claims, the agency lacks the authority and sufficient resources to adequately protect the public's right to know.

Threshold for Regulation – Even once the EPA has obtained the requested safety data, the bar set by TSCA to implement actual regulations to reduce risk is impossibly high. Not only must the agency show that the chemical exposure presents “an unreasonable risk of injury to health or the environment,” but it must also demonstrate that the proposed restriction is the “least burdensome requirement” available. In proposing a restriction on a chemical, the EPA must also consider factors beyond the health impacts, including a cost/benefit analysis of the regulation. We need look no further than the agency's inability to ban asbestos, a known carcinogen with an entire disease named after it, to understand how impossibly high the bar is for EPA to act to protect public health.

The overall effect of this system is to place the burden of proving that a chemical is harmful on the EPA, instead of having chemical manufacturers bear the burden of proving safety.

Fixing Our Broken System

There is broad consensus that TSCA must be reformed. The EPA, state public health officers, health care professionals, scientists and health affected groups are all calling for swift Congressional action on this critical issue. Recent federal reports have also called for TSCA reform. The 2010 President's Cancer Panel report *Reducing Environmental Cancer Risk, What We Can Do Now*, the 2011 CDC's National Conversation on Public Health and Chemical Exposures, and the 2013 Interagency Breast Cancer and Environmental Research Coordinating Committee (IBCERCC) report *Breast Cancer and the Environment: Prioritizing Prevention* both called for TSCA to be strengthened to give the EPA the information and tools needed to protect the health of American families. The IBCERCC report cites the 2009 GAO report,^{xiii} which found that although TSCA authorizes the EPA to ban, limit or regulate chemicals, the threshold to take action requires meeting a prohibitively high level of risk after conducting a lengthy and expensive cost-benefit analysis. Based on deficiencies identified in the report, the GAO added TSCA reform to its high-risk list (See 8.23 IBCERCC report).

The Breast Cancer Fund's president and CEO, Jeanne Rizzo, recently had the honor of serving as one of the co-chairs of the committee that wrote the groundbreaking [*Breast Cancer and the Environment: Prioritizing Prevention*](#) report. IBCERCC was housed at the National Institutes for Health, specifically the National Institute of Environmental Health Sciences and the National Cancer Institute, and was comprised of federal agency staff, medical and scientific experts, and breast cancer advocates. The report includes the largest to-date survey of peer-reviewed science on breast cancer and the environment, and finds that environmental factors like toxic chemical exposure increase breast cancer risk. In addition, the report identifies the gaps in research and policies, concluding that "prevention is the key to reducing the burden of breast cancer," and calling for a national, comprehensive, cross-governmental breast cancer prevention strategy. A key recommendation of the report is the urgent need to update and reform TSCA:

"Improving the TSCA is a priority for collecting the data needed to generate and test hypotheses regarding the effects of a wider range of chemicals on breast cancer risk and, ultimately, for preventing environmentally caused disease." p. 6-35

Any effort to mitigate the environmental causes of breast cancer, or other diseases linked to exposure to environmental chemicals, must include a plan to reform TSCA.

The Chemical Safety Improvement Act Falls Short

The introduction of S. 1009, the Chemical Safety Improvement Act (CSIA) has changed the conversation in Washington, DC. No longer are we talking about if we should reform the broken chemicals management system set up by the 37-year-old Toxic Substances Control Act (TSCA). Now we are engaged in a conversation about what that reform must look like to be meaningful and truly safeguard the American public, and particularly vulnerable populations, from exposures to dangerous chemicals.

Protecting public health and the environment should be the primary and overriding goal of TSCA reform. Unfortunately, the Chemical Safety Improvement Act falls short of that goal. As written, this legislation could set back the few current protections in place, particularly at the state level, without ensuring that the EPA has the necessary authority, tools and resources to provide real federal protection. While the Breast Cancer Fund opposes the bill as it is currently written, we stand ready to work with Congress and all stakeholders to address the bill's significant flaws and craft meaningful and effective chemical policy reform.

To be true reform and to accomplish the goal of protecting America's families and workers, any effective chemicals management system must include the following elements and unfortunately the CSIA as currently written fails to meet these basic requirements.

A safety standard that is health-protective, particularly of vulnerable populations.

The safety standard must explicitly protect vulnerable populations. Pregnant women, children, workers and communities living in areas of high chemical exposures all need and deserve our protection and by protecting them, we will protect all of us and future generations.

The CSIA does not explicitly require a consideration of the health impacts of chemical exposure to our most vulnerable populations including pregnant mothers, children, workers or disproportionately exposed communities. The legislation also maintains the current TSCA safety standard which has failed to protect public health. This continued use of TSCA's flawed

“unreasonable risk of harm to health or the environment” safety standard raises a number of unsettling questions: Who decides if a chemical presents an “unreasonable risk?” And who bears the burden of proof for meeting that standard – the EPA (and therefore the public) or industry? One of the major failures of the current TSCA is that the burden falls on the EPA to prove chemicals are not safe rather than on industry to demonstrate their chemicals are safe. Any meaningful reform of TSCA must clearly shift the burden of proof to industry to demonstrate the safety of the chemicals they manufacture and market.

Finally, we are not exposed to one chemical at a time, or even just one source of a particular chemical. It is essential for the EPA to consider aggregate exposures when determining safe levels of a chemical. CSIA allows for such consideration but does not require it.

Use of the best science available. TSCA reform should ensure the use of the best available science by incorporating recommendations from the National Academy of Sciences reports on reforming the EPA’s risk assessment process. Legislation must also protect the integrity of scientific review from undue industry influence and incorporate science from all sources, including government agencies and academia.

For years, the chemical industry has been waging a well-funded campaign against government and academic science showing adverse health effects and increased health risks associated with specific chemicals. The language in the CSIA reflects those chemical industry efforts to undermine and devalue government and independent science while protecting industry-funded science. To ensure the highest quality and best available science, the CSIA should require scientific procedures and guidelines developed in the bill follow the recommendations of the National Academy of Sciences for 21st century toxicology.

Require data on all chemicals. The EPA should require chemical manufacturers to demonstrate via scientific data that their chemical is safe. The absence of data should not default to assuming the chemical is safe.

The CSIA sets up a two-tiered system for EPA review of the safety of industrial chemicals. Chemicals designated as high priority must be scheduled for a safety assessment and safety determination. Low priority chemicals are those that the EPA determines as “likely to meet the safety standard,” and once so designated, are set aside with no further action unless the EPA is explicitly requested to reevaluate the low priority designation of a specific chemical. Under CSIA, there is no upfront requirement for manufacturers to develop or submit scientific data showing a chemical is likely to meet the safety standard of not presenting an “unreasonable risk of harm to health or the environment.” In fact, the burden falls to the EPA to find information that is “reasonably available to the Administrator” including requiring the EPA to actively search for publicly available data. The EPA can request or require more data, by consent agreement or order, but this adds an additional level of administrative burden, a burden that should be industry’s from the beginning. The bill should make clear that no chemical should be designated as low priority without sufficient data to affirmatively show it is safe.

Action on the worst chemicals. For some chemicals we have enough scientific evidence showing harm to act now to reduce exposures. TSCA reform must allow the EPA to take fast action on the worst chemicals, including persistent, bioaccumulative toxins (PBTs): toxic chemicals that are persistent in the environment and bioaccumulate in organisms, including humans.

Instead of allowing for fast action on the worst chemicals, CSIA retains TSCA's impossibly high regulatory burden when the EPA identifies the need to ban or phase out a toxic chemical. Since these actions would be reserved for the most dangerous chemicals, this provision would have the exact opposite effect of what is needed – creating regulatory barriers that will slow down or halt altogether needed restrictions rather than expediting action on the worst chemicals.

Include sufficient deadlines and timetables. Enforceable deadlines are essential, particularly given the history of the chemical industry's ability under current TSCA process to delay evaluation and regulation of chemicals for years and sometimes decades. CSIA provides virtually no deadlines or timelines for completing critical tasks such as safety assessments and safety determinations. While there are a few deadlines for creating procedural guidelines, language like “promptly,” “every effort to complete...in a timely manner,” “from time to time,” “expeditiously completing,” “reasonable extensions,” “reasonable period,” and “as soon as possible” take the place of specified timetables and deadlines. In our criminal justice system there is an expression that “justice delayed is justice denied.” In this case, chemical regulation delayed allows for dangerous exposures that threaten public health.

Protecting the public's right to know about the health hazards of specific chemicals. Reform should require that the public have access to information regarding the safety of chemicals, including the identity of hazardous chemicals. State and local agencies also need chemical identity and safety data to allow them to do their job of protecting citizens from hazardous exposures.

The CSIA does not go far enough to ensure the public has adequate access to information on the safety of industrial chemicals that end up in their environment, workplaces, communities and consumer products. The bill would allow the EPA to share CBI with state and local authorities and medical personnel with certain conditions, which is a step forward. However, the process for sharing the information in most cases calls for alerting the submitter of the CBI claim before releasing the data and provides the opportunity for judicial review, allowing the submitter to sue to keep the information confidential. These judicial reviews could prevent the sharing of the information or at the very least cause significant delays.

Currently, the EPA has little authority and even fewer resources to challenge CBI designations, so the vast majority of claims are simply accepted without serious review of their legitimacy. Chemical identity, particularly of a hazardous substance, is critically important for manufacturers to make safer choices for their products, for workers to protect themselves and their families from unsafe exposures, for retailers crafting policies to protect their customers, for scientists to conduct effective research and ultimately for consumers wanting to make informed purchases to protect their families. Given the historic and ongoing abuse of CBI, it is particularly troubling that the CSIA leaves all current CBI claims in place, grandfathering them in with no requirement or incentive for the EPA to review or substantiate the need for that information to be held as confidential.

Allow the states to continue to protect their citizens. Finally, TSCA reform must respect the right of states to protect their residents if the federal government fails to do so or is slow to act. With the EPA's hands tied by the complete failure of TSCA, citizen demand has driven states from around the country to step up to provide protection from harmful chemical exposures through legislation on a variety of chemicals and uses. These laws not only protect citizens within the state borders, but have also had a positive impact on manufacturing practices and products throughout the country. States must continue to have that ability.

CSIA does not adequately protect the right of states to safeguard their citizens from harmful exposures when the federal government can't or won't take action. The CSIA could roll back the current state protections in place and would stifle future state protections. State laws that are in place when the CSIA is enacted would be pre-empted once the EPA has completed a safety determination of the particular chemical in question. However, completion of the safety determination is not the same as having federal safety protections in place. The process and timeframe between issuing a safety determination and issuing of a final rule to implement needed restrictions can be a very long one, including the protracted process of rulemaking and the possibility of lawsuits that could delay implementation indefinitely.

Under CSIA, states would be barred from passing future laws once a chemical is designated as low priority or designated as high priority and scheduled for a safety assessment and determination. Given the lack of deadlines in the bill, once scheduled a chemical could sit for any number of years before action is taken, during which time the state's hands are tied and the public unprotected. Once a chemical is designated as low priority, which is designed to be basically an educated guess by the EPA as to whether or not a chemical will meet the safety standard, the states are also prohibited from taking any action on that chemical.

Conclusion

Chemicals policy reform is a public health necessity. For too long industry has argued against updating TSCA by saying that more protective chemical policy is bad for the economy and will cost jobs. The choice between jobs and safe chemicals is a false dichotomy. Chemical policy reform that encourages green chemistry can stimulate innovation and economic growth – and we have the best and the brightest in this country ready to meet that challenge. And consider the cost to the economy of doing nothing. The financial drag of chronic disease on the economy is staggering, both in terms of health care costs and lost productivity. Taking action to reduce that burden will help not hurt the economy.

For the reasons outlined in this testimony, it is urgent and essential that we create a chemicals management system that protects all of us...at all stages of our lives. Congress has a moral imperative to pass legislation strengthening the way chemicals are regulated to provide the public real protection from dangerous chemicals. TSCA does not meet that goal. CSIA in its current form does not meet that goal. But creating workable and health protective legislation is doable. While we understand that compromise is always part of the legislative process, we must not compromise public health. There are core values that must be addressed before any legislation can truly be called chemicals policy reform. The opportunity is before us to work together with all stakeholders in a bipartisan way to address the outstanding issues and concerns. We owe it to the women and men facing breast cancer and all of the individuals dealing with diseases linked to chemical exposures to rise to this opportunity.

I would like to leave you with this quote from Florence Williams' critically acclaimed book *Breasts: A Natural and Unnatural History*:

Breasts are bellwethers for the changing health of people. If we're becoming more infertile, producing increasingly contaminated breast milk, reaching puberty earlier and menopause later, how can we fulfill our potential as a species? ... Breasts carry the

burden of the mistakes we have made in our stewardship of the planet, and they alert us to them if we know how to look.”^{xiv}

We look forward to working with the Committee members to create a bill that meets the challenges outlined here and protects all of our citizens. The Breast Cancer Fund stands ready to help meet the challenges of crafting meaningful TSCA reform and I thank you again for the opportunity to testify. I look forward to answering questions from the Committee.

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ⁱⁱⁱ Interagency Breast Cancer and Environmental Research Coordinating Committee. *Breast Cancer and the Environment: Prioritizing Prevention*. 2013.

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^{xiv} Williams, Florence (2012). *Breasts: A Natural and Unnatural History*. New York, NY: W. W. Norton & Company.