

August 3, 2004

1 page via e-mail and fax: 202.323.2592

Ken Cook, President
Environmental Working Group
1718 Connecticut Ave. N.W.
Suite 600
Washington, DC 20009

Dear Mr. Cook:

I am writing in regard to the Environmental Working Group's (EWG) recently launched campaign, **Skin Deep**, and its potential implications for animals in laboratories. Specifically, your request that companies sign on to a pledge to "determine [the] toxicity to living things...including carcinogens, endocrine disrupters, sensitizers, mutagens, reproductive toxins, developmental toxins and neurotoxins" could, if implemented using standard methods, spell suffering and death for tens of thousands of animals in laboratory poisoning studies.

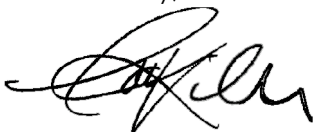
More than three years ago, you corresponded and met with PETA's Federal Agency Liaison, Jessica Sandler, to discuss our organizations' respective positions on animal testing vis-à-vis the assessment and regulation of chemicals in the environment. As you know, the U.S. government is reluctant in the extreme to ban hazardous chemicals on the basis of animal data, and there are very few examples of it actually having done so. Moreover, chemical manufacturers argue every day that animal data are not applicable to humans (see, for example, the debacle in the U.S. over phthalates, with which you are obviously well acquainted). A recent article in *Womens News* (4.30.04) illustrates this point succinctly:

The Cosmetic, Toiletry, and Fragrance Association calls the European regulation 'unnecessary' and dismisses research on phthalates for two reasons: phthalate levels in cosmetics are well within U.S. safety standards and because most studies on the chemicals' ill effects have been conducted on animals and not humans ... industry insiders say levels of the substance are safe and the outcry is all based on tests of animal subjects that do not translate into human risks.

While we have concerns with a number of specific substances that EWG has singled out for further study (e.g., substances about which much is already known and documented), it would seem to be counterproductive to limit our discussion to such specifics at this point. Rather, we would like you to consider reworking your "Compact with America" to specifically state that non-animal test methods should be used and existing data mined for information on the ingredients of interest. Otherwise, your **Skin Deep** campaign could easily turn into yet another animal-testing boondoggle that companies undertake as a public relations exercise, but which does nothing in the long run to actually protect the public from hazardous products.

I am in DC on a fairly regular basis, and would be happy to meet with you to discuss these matters further. Please let me know when your schedule could accommodate such a meeting. I can be reached at 519.570.3208 (voice) or TroyS@peta.org.

Sincerely,



Troy Seidle
Science Policy Advisor



PETA

PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS

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