

February 6, 1984

Mr. Lane W. Adams
Executive Vice-President
American Cancer Society
777 Third Ave.
New York, N.Y. 10017

Dear Mr. Adams:

Over the past seven years, public interest and environmental groups, unions, and recently 28 prominent scientists have urged the ACS to broaden its focus on cancer-prevention. Many of these same groups have now joined with others to once again urge ACS to take all necessary steps to vigorously advocate the speedy elimination or reduction of the public's exposure to carcinogens in the environment, workplace, and food supply.

ACS's strong advocacy of tobacco issues has been admirable. ACS has lobbied for stronger labels on cigarette packages and higher tobacco taxes. Thus, ACS understands the need to prevent exposure to the chemical causes of cancer before disease strikes; it should now apply its knowledge and experience to preventing exposure to other occupational and environmental carcinogens as well.

To date, outside of the smoking area, the ACS has done very little to prevent cancer through influencing public policy. While ACS has enlarged its Washington office -- a step we applaud -- ACS has studiously avoided supporting measures to control any carcinogen other than those in cigarettes, has not defended the budgets and integrity of beleaguered regulatory agencies, and has failed to emphasize a comprehensive prevention approach in its educational and research activities.

The ACS's limited war on cancer falls short of what a \$220 million a year organization could do and what it promises its public supporters. ACS relies too heavily on curing and treating the disease, while almost totally ignoring the thousands of preventable cancers attributable to occupational or environmental exposures. Despite its promise to the public to do everything to "wipe out cancer in your lifetime," ACS fails to make its voice heard in Congress and the regulatory arena, where it could be a powerful influence to help reduce public exposure to carcinogens. Thus, thousands of deaths from this terrible disease are particularly tragic because they could have been prevented.

ACS has left the role of educating the public and government officials on comprehensive cancer-prevention issues to small environmental and health groups. While these groups have had some success in getting major cancer-fighting legislation passed and regulations adopted, ACS involvement and leadership could significantly accelerate the pace.

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Unfortunately, the ACS has also taken several major steps backwards. In 1982, ACS adopted a cancer policy that requires human proof that a substance is a carcinogen before ACS advocates controls. Such emphasis on human proof is contrary to the tenets of authoritative scientific committees and established federal policy, which has long recognized animal evidence of an agent's carcinogenic potential as sufficient for reducing human exposure.

In 1982, ACS's Public Issues Committee also overwhelmingly voted down a resolution to defend the budgets of the cancer-related regulatory agencies.

Regrettably, ACS's public statements on carcinogens frequently downplay the need for regulatory intervention because of the lack of epidemiological data on human carcinogens. These data are rarely obtainable and then only after several decades of human exposure and deaths. ACS's failure to speak out on all significant chemical carcinogens implies that the danger does not warrant the public's attention.

We believe, therefore, that ACS should reform its policies immediately, and become an aggressive, pro-active cancer-prevention organization. ACS should establish a top-flight legislative affairs department in Washington that is equal to ACS's reputation and finances. ACS should have physicians, scientists, and attorneys, with support staff, on hand to compete effectively with the large and well-supported lobbying staffs maintained by those who profit from manufacturing and distributing carcinogens. In addition, ACS should mobilize its network of chapters and volunteers so as to mount a grassroots attack to prevent cancer deaths.

Such a top-flight legislative affairs department would monitor the federal regulatory agencies, including the Environmental Protection Agency, Food and Drug Administration, Consumer Product Safety Commission, Department of Agriculture, and the Occupational Safety and Health Administration, thus enabling ACS to participate in or initiate regulatory proceedings on carcinogens. Protecting the budgets of these agencies would be equally important.

Another essential activity for a progressive cancer organization is to support broad legislation to reduce or eliminate exposure to carcinogens, including the Clean Air Act; the Toxic Substances Control Act; Superfund; the Delaney amendment of the Food, Drug, and Cosmetic Act; and pesticide legislation. It should be noted that although the March of Dimes and the American Heart Association have joined a coalition to fight for the Clean Air Act, the American Cancer Society has refused to join.

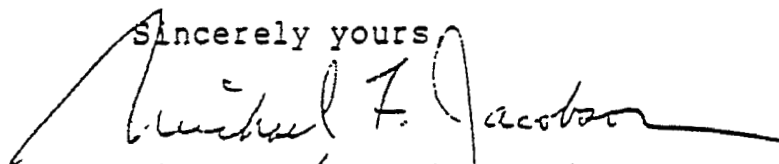
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Finally, the ACS should be allocating significantly more of its research dollars to prevention-oriented projects, and should be urging the National Cancer Institute to do likewise.

To assist ACS in these moves, we urge the Society to add a significant number of toxicologists and experts in chemical carcinogenicity, as well as labor, environmental, and public interest representatives to its House of Delegates, Board of Directors, and Public Issues Committee.

We sincerely hope our recommendations will be given immediate and fruitful consideration. In the absence of the establishment by ACS of a legislative department that vigorously seeks to prevent cancer, and a general reorientation towards prevention in ACS educational and research activities, we believe that a national educational campaign to inform the public of the limitations of the Cancer Society will be in order.

Sincerely yours



Michael F. Jacobson, Ph.D
Executive Director
Center for Science in the Public Interest

On behalf of:

Mr. Charles Bremer, Administrative Director
A. Philip Randolph Institute

Appalachia Science in the Public Interest, Dr. Al Fritsch

Cancer Consultation Service, Reverend Howard Moody

Center for Medical Consumers, Ms. Maryann Napoli

Center for Occupational Health, Dr. Michael McCann

Ms. Winifred Veitch
Citizens for Clean Land, Air, and Water (Waddington, New York)

Community Nutrition Institute, Mr. Rod Leonard

Mr. Steven Brobeck, Executive Director
Consumer Federation of America

Mr. John Conyers, Jr.
Congressman, First District, Michigan

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District 1199 Wisconsin, Ms. Tracy Suprise, President

District 1199 New York, Ms. Dorris Turner, President

Mr. Alden Meyer, Executive Director
Environmental Action, Inc.

Dr. William Brown, Acting Executive Director
Environmental Defense Fund

Food Research Action Council, Ms. Nancy Amidei

Friends of the Earth, Mr. Jeffrey W. Knight

Mr. Arnold Cohen
Ironbound Community Health Project (Newark, New Jersey)

Journey House, Inc. (Milwaukee, Wisconsin), Mr. Tom Williams

Missouri Coalition for the Environment, Mr. Steven Sorkin

National Audubon Society, Dr. Russ Peterson

Mr. Jay Feldman, Executive Director
National Coalition Against the Misuse of Pesticides

Mr. John Adams, Executive Director
Natural Resources Defense Council

Mr. Joel Schuffro
New York Committee for Occupational Safety and Health

People Against Cancer, Mr. Myron L. Sifton, President

Ms. Ellen Haas, Executive Director
Public Voice for Food and Health Policies

Mr. John Sweeney, President
Service Employees International Union

Sierra Club, New Jersey Chapter, Ms. Diane Walker

Texas Center for Rural Studies/Pesticide Project, Ms. Tami Adams

White Lung Association, Mr. James F. Fite, Executive Director

Mr. Mark Schultz
Wisconsin Committee on Occupational Safety and Health

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