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January 25, 2010

The Honorable Edward Markey
2108 Rayburn House
Office Building
Washington, D.C. 20515

Dear Representative Markey:

We are writing to commend your January 5, 2010 letters to the FDA and EPA regarding regulation of triclosan in antibacterial soap. Thank you for your continued leadership in confronting the potential dangers following use of triclosan and other surface antibacterials in household cleaning agents.

Antibiotic resistance is recognized as one of the top three public health threats by the U.S. CDC, WHO and FDA. The proliferation of superbugs is complicating treatment of every infection known to man in healthcare facilities and households.

The overuse of antibiotics in agriculture, human medicine, and now in household products, is leading to increased drug resistance and complicating treatment of infections. While federal efforts are underway to promote more prudent use of antibiotics in human medicine and agriculture, antibacterial household products fall into a “regulatory black hole.”

The global spread of drug-resistant infections was mapped out in the APUA GAARD Report published in *Clinical Infectious Diseases* (CID) in 2005. This report found global penicillin resistance rates for *S. pneumoniae* as high as 54 percent and macrolide resistance for this organism up to 72 percent. A recent APUA-initiated study at Cook County Hospital in Chicago documented a two-fold higher death rate for patients with resistant infections and an additional 6.4 – 12.7 hospital days for patients with resistant versus susceptible infections.

Over 1000 household products contain triclosan. While good hygiene is an important foundation for infection control, triclosan cleaning agents are paradoxically implicated in promoting new super germs that are resistant to antibiotics, linger on surfaces, and can be transferred to humans.

To avoid possible public health problems associated with the increasing use of triclosan containing products, the government needs closer scrutiny and research regarding these potential results:

- Disruption of normal bacterial flora which allows proliferation of less desirable species
- Link to emergence of MRSA in the community
- Negative effects on thyroid function
- Skin irritation
- Immune system disruption.

While the use of triclosan and other strong biocides may be appropriate under special regulated circumstances they are not for routine use in the healthy household. Children in day care centers and the elderly in nursing homes are particularly vulnerable to resistance. Washing with plain soap and water produces 99 percent of the hygiene control a normal household requires. Bleach and pinesol agents are more appropriate as they do not leave behind the resistance-promoting residue which triclosan has exhibited in the laboratory.

Attached is the APUA Newsletter focused on infection control and our report "Hygiene for a Healthy Household." Thank you again for your advocacy and concern. We would be pleased hear from your staff and help in any related matters.

Sincerely,



Stuart B. Levy, M.D.
President, APUA



Kathleen T. Young
Executive Director, APUA

cc: Congressman Stephen Lynch, Kevin Ryan