

February 26, 2024

Dear Members of Congress,

The safety of America's drinking water demands that deliberate pollution be addressed, and pollutants tracked to the best of our nation's ability. Recently, the Environmental Protection Agency (EPA) has begun monitoring a list of "[forever chemicals](#)" – substances that linger in America's drinking water and are determined to pose a risk to those exposed to them. [In a recent letter sent to the EPA](#), Students for Life of America explained, "In recent years, and largely in 2023, the EPA has increased its efforts to regulate per- and polyfluoroalkyl substances ("PFAS"). With rulemaking, guidance, published initiatives, newly established pollution standards, and more, the EPA has addressed concerns of pollution as a result of PFAS being released on large scales into the environment. The EPA's increased understanding of the environmental harms these chemicals create has led it to take a closer look at the issue and ultimately implement new strategies and regulations to control the release of PFAS and monitor their impact more carefully. In implementing these new initiatives, the EPA has shown a commitment to monitoring and controlling the effect that a constant stream of chemicals and harmful substances – no matter how small those substances may be – may have on the environment."

In light of this effort, we urge you to direct the EPA to conduct regular and comprehensive environmental testing for the presence of the abortion drug mifepristone in the same manner as testing is conducted for "forever chemicals" or PFAS chemicals. This data is needed to assess potential environmental harms from exposing aquatic animal and plant life and the people relying on them to mifepristone, a widely used chemical abortion drug that according to the Planned Parenthood-founded Guttmacher Institute now [accounts for more than half of all U.S. abortions](#).

As there is [no mandatory national abortion data collected by the Centers for Disease Control \(CDC\)](#) nor is there [consistent data regarding adverse outcomes](#) by the Food and Drug Administration (FDA), the full scope of mifepristone use is poorly tracked. As such, data on the scope of any environmental hazard is also limited.

However, the scope of [potential environmental contamination](#) is likely on the rise, when considering that three-quarters of abortions in Europe are committed with Mifepristone pills, according to [the New York Times](#). Elsewhere the percentage is even higher, as an NIH report notes that countries like Finland use Mifepristone pills [97.7% of the time](#), and in Sweden, the pills [are used more than 96.4% of the time](#).

There is evidence that aquatic animal and plant life can be negatively impacted by Mifepristone, but it has not been sufficiently investigated. Mifepristone can be present in the remains of the blood and placenta tissue that, along with a preborn child, is flushed into America's wastewater when disposed of at a home, apartment, or dormitory. What limited research has been conducted shows:

- Active metabolites including monodemethylated, didemethylated, and hydroxylated metabolites of mifepristone, all retain considerable affinity toward human progesterone and glucocorticoid receptors.ⁱ Mifepristone has been detected in waste water possibly due to passing of contaminants found in blood following induced abortion.^{ii, iii}
- Drugs with similar effects as mifepristone, those drugs known as endocrine disrupting compounds, containing progesterone inhibitors, have a similar chemical makeup and have been shown to be passed into waste water and into wildlife.^{iv,v,vi,vii,viii,ix}
- Early studies of mifepristone showed mutation of sex organs in fish and were never thoroughly investigated.^x The negative impact of endocrine disrupting compounds on animals including fish, farm animals, dogs, and cats is documented in many studies of these types of drugs.^{xi,xii}

The extent to which mifepristone is then present in wastewater has not been sufficiently studied, and the increase in the number of chemical abortions over the past two decades gives strong reason to assess the presence of the drug in the environment and consider any related hazards.

Any such testing should be conducted in a manner that provides data regarding environmental impact, an effort that will not reveal personally identifiable information about individuals, as the focus is on water testing. Such research would strengthen and expand the already existing CDC/NCHS collaborations with EPA that strives to implement, house, and maintain the most up-to-date data to better identify communities at risk. EPA is already committed to efforts such as the "[American's Children and the Environment \(ACE\)](#)" indicators series related to describing contaminants in the air children breathe, the water they drink, and the food they eat.

In light of this, we call on Congress to demand that the EPA begin tracking the active metabolites of Chemical Abortion Pills as part of their on-going efforts to determine long-term harms in our water. Heightened distribution of abortion drugs gives urgency to the need for environmental monitoring in the interest of protecting life, from endangered species to human beings. Doing so is vital to ensuring that our environment does not fall victim to unintended consequences.

Sincerely,

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ⁱ <https://pubmed.ncbi.nlm.nih.gov/14698071/#:~:text=The%20three%20most%20proximal%20metabolites,human%20progesterone%20and%20glucocorticoid%20receptors>

ⁱⁱ <https://www.sciencedirect.com/science/article/abs/pii/S0043135418301787>

ⁱⁱⁱ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9657224/>

^{iv} <https://pubmed.ncbi.nlm.nih.gov/20347536/>.

^v <https://pubs.acs.org/doi/10.1021/es801845a>.

^{vi} <https://link.springer.com/article/10.1007/s10337-018-3631-0>

^{vii} <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7139484/>

^{viii} <https://www.sciencedirect.com/science/article/pii/S0013935121018855>

^{ix} <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4213582/>

^x <https://pubmed.ncbi.nlm.nih.gov/31491707/#:~:text=A%20long%2Dterm%20exposure%25>

^{xi} <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4584497/>

^{xii} <https://www.sciencedirect.com/science/article/pii/S0013935121018855>