



Think Autism. Think Cure.

September 6, 2006

Andrew C. von Eschenbach, M.D.
Food and Drug Administration
5630 Fishers Lane
Rockville, MD 20852

Dear Dr. von Eschenbach:

The National Autism Association requests that the Food and Drug Administration conduct the long overdue investigation of the impact of vaccine-injected mercury upon the health of this nation's children. Our organization appealed to the FDA in 2004 to remove thimerosal from all vaccines for the sake of public health and safety. This appeal has yet to be addressed by your agency.

Along with a growing number of researchers, we believe that exposure to mercury through increased use of thimerosal-containing vaccines that began in the late 1980's has led to an unprecedented public health crisis in this country. The rise in pediatric neurological disorders consistent with mercury toxicity is in direct proportion to the increase in the amount of mercury our children received through vaccines. We believe this to be the principal reason that an estimated one in six children now requires special education services in our schools.

Our organization hears daily from an increasing number of families who are convinced their children's diagnoses such as autism and ADHD are directly attributable to gross overexposure to mercury received through vaccines.

The extreme neurotoxicity of mercury in general and thimerosal in particular have been known for decades. We ask the FDA to consider that in 1935, veterinary vaccine manufacturer Pittman-Moore wrote in a letter to Eli Lilly & Co., the original producer of thimerosal:

*"We have obtained marked local reaction in about 50% of the dogs injected with serum containing dilutions of Merthiolate.....Merthiolate is unsatisfactory as a preservative for serum intended for use on dogs."*¹

In a study published in 1977, D.G. Fagan refers to 10 deaths among 13 infants upon which thimerosal was used as a topical treatment for umbilical hernias and found that:

*"in 9 of the 10 cases autopsies revealed organ mercury levels in the liver, kidney, blood and brain.....thimerosal can induce blood and organ levels of organic mercury which are well in excess of the minimum toxic levels in adults and fetuses."*²

A 1983 study published in a Russian epidemiology journal states:

*"...thimerosal....has been found not only to render its primary toxic effect, but also capable of changing the properties of cells. This fact suggests that the use of thimerosal for the preservation of medical biological preparations, especially those intended for children, is inadmissible."*³

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More recently, in the year 2000, FDA scientist William Slikker states in the journal *Neurotoxicology*:

*"Thimerosal crosses the blood-brain and placental barriers and results in appreciable mercury content in tissues including brain."*⁴

The [attached letter](#) from former Austrian chief regulator of vaccines and blood products, Dr. Wolfgang Maurer, references a 1993 meeting at which FDA officials were further warned of thimerosal's toxicity. This became yet another unheeded wake-up call leading to tragic consequences for the children of our country.

The amount of mercury injected into the most vulnerable among us was allowed to triple during the 1990's. We believe that the hundreds of thousands of children diagnosed with autism are actually living with the consequences of this overexposure to mercury. The resulting devastation to the affected families—physically, emotionally, and financially—is incalculable. There is no health care issue that more urgently needs the FDA's full and open investigation.

Sincerely,

Rita Shreffler, Executive Director
Wendy Fournier, President
Ann Brasher, Vice President
National Autism Association

References:

1. Director of Biological Services, Pittman-Moore Company, letter to Dr. Jamieson of Eli Lilly Company dated 1935. U.S. Congressional Record, May 21, 2003, E1018, page 9.
2. Fagan DG, Pritchard JS, Clarkson TW, Greenwood MR. "Organ mercury levels in infants with omphaloceles treated with organic mercurial antiseptic." *Archives of Disease in Childhood*. 1977 Dec; 52 (12):962-4.
3. Kravchenko AT, Dzagurov SG, Chervonskaia GP. "Evaluation of the toxic action of prophylactic and therapeutic preparations on cell cultures. III. The detection of toxic properties in medical biological preparations by the degree of cell damage in the L132 continuous cell line." *Zh Mikrobiol Epidemiol Immunobiol*. 1983 Mar;(3): 87-92.
4. Slikker, William, Jr. "Developmental Neurotoxicology of Therapeutics: Survey of Novel Recent Findings." *Neurotoxicology*, 21, page 250 (2000).

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