

December 19, 2024

Adam Calendrillo

Department of Labor

United States Government

Dear Adam

In our last committee meeting I was asked to do a more in depth 2 year review of the current status and thinking around the incidence of female firefighters and their development of cancer related the exposure to carcinogenic compounds in their firefighting duties and to provide additional recommendations for the addition of covered female firefighter cancers to be included in any new FECA Guidance Materials.

It is interesting to note that over the past 12-24 months there are several highly respected researchers and their institutions that are weighing in on this question many in the form of scientific letters to journals along with a couple of new research articles.

As we know the FECA guidance materials are silent as it relates to female cancers with the rationale of such few cases to create statistical significance. This has been a difficult challenge for female firefighters regarding their future risk of cancer due to their occupational exposures.

Additionally, a recent scientific survey research study was performed involving over 1300 female firefighters compared to female non firefighters which revealed a surprising result which will be included in my recommendations

In several scientific letters there has been clear acknowledgment of female exposure to PFAS and phenols acknowledging a double increase in the incidence of melanoma and basal cell carcinoma along with an increased risk of breast cancer. There also has been a link determined between PFNA and uterine cancer.

Approximately 90% of all cancers are due to the development of genetic malformations caused by chemical, biological and toxicological exposures. The incidence of non-firefighter cancer in the population is relatively the same regarding men and women and the types of cancer diagnosed are closely the same except for sexual organs.

There is no scientific doubt that exposure to known carcinogenic compounds is associated with the development of cancer in humans but most importantly in firefighters who are expected to work in exposure to known carcinogenic compounds.

Therefore, based upon scientific review, the following are my recommendations to include in the next FECA Guidance Bulletin adding the following cancers to females as related to carcinogenic compound exposures.

The first group are recommended based upon scientific exposure research related to PFAS and other carcinogenic compounds related to combustion.

- Basal Cell
- Breast

The following are my additional recommendations related to significantly increased incidence of the following cancers in female firefighters as compared to female non-firefighters incidence determined through population research between female firefighters and female non-firefighters.

1. Cervical
2. Ovarian
3. Uterine

Thank you for the opportunity to provide my FECA Guidance recommendations.

A handwritten signature in blue ink, appearing to read "Steven M. Moffatt, M.D.", is positioned above the typed name.

Respectfully

Steven M. Moffatt, M.D.

Executive Director/Chief Clinical Science Officer

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Vice President of Ascensio Public Safety Health