June 1st, 2020

The Honorable Stephen Hahn, M.D.
Commissioner
U.S. Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

Dear Commissioner Hahn,

I write to you today as the leader of Students for Life of America (SFLA) and Students for Life Action (SFLAction), which has almost 1,300 groups in all 50 states on middle school, high school, college and university, medical and law school campuses, about the dangers surrounding chemical abortions via RU 486. We are asking for a virtual meeting with our activists and the Food and Drug Administration (FDA) to request the agency:

- Hold the line on the REMs that require an examination that protects women, including requiring a Rh negative assessment.
- Seize websites illegally selling chemical abortion pills to American citizens.
- Re-examine and take control of the study that Gynuity Health Projects is engaged in, which is distributing life-ending drugs through a federal contractor, Planned Parenthood, in ways known to be unsafe.
- Re-open an examination of the environmental impact of flushing human remains into the nation’s water system.

According to the abortion industry think tank the Guttmacher Institute, almost 40 percent of all abortions are now committed by chemical abortion pills, a number that can’t be verified as no National Abortion Reporting Law exists. Given that on-line abortion vendors are illegally operating, selling abortion pills in ways that the FDA has condemned in letters to Aid Access and Rablon, that number is most certainly higher with implications for women’s lives, health, and future children. Students for Life of America and Students for Life Action represents the generation targeted by the chemical abortion pill industry, which pushes these drugs as a quick fix and camouflages their deadly realities. Earlier this year, SFLA and SFLAction joined a coalition letter asking you at the FDA to shut down the illegal, on-line sales centers for the pills. But that’s only the beginning of what is needed.

As the New York Times recently detailed, the market shift of the abortion industry has been long in the works and is now in plain sight during the coronavirus crisis. They and their allies have argued that the FDA should reduce or drop the REMs, the Risk Evaluation and Mitigation Strategy (REMS), health and safety standards designed to ensure that people are not harmed by the drugs sold. A former FDA official has even joined in that call. Also at play, a so called study by Gynuity Health Projects that distributes RU-486 with minimal patient interaction because “(t)he Food and Drug Administration is allowing the service to operate.” By its own admission,
Gynuity seeks to push the limits of the safety restrictions and invent new ways of ending life with chemicals.

This concerted effort to take advantage of a crisis to make it easier to sell life-ending drugs ignores the dangers of such pills, well known to the FDA.

These risks include an incomplete abortion requiring surgery, life-threatening infection, severe bleeding, and even death. To determine a woman’s risks from the pills, an examination has been required. But taking time to protect women’s lives and health is described as a “barrier” to abortion “access” by those who want to make a quick sale. In fact, the abortion industry is pushing “No Test” abortion and recommending an end to Rh negative testing, which protects a woman’s ability to have children in the future.

It is not in the public interest and certainly not in women’s interests to endanger lives by making it easier for abortionists to operate. It’s no surprise that a business wants to be free of health and safety standards, but the FDA’s role in holding the line on behalf of the public is vital on the issue of chemical abortion pills, as it is with all deadly drugs.

Political pressure being applied at this time, to force a change in the REMs, reflects the fact that women’s health is not the priority of those who want to weaken the REMs, but rather their focus is on the business and political interests of the well-connected Planned Parenthood and company. Mailing a few pills to women and abandoning them to whatever happens next serves the interests of the abortion industry, which has outsourced their responsibility … for any emergency surgery that might be needed, from infection that might occur, for domestic violence as abusers with such drugs use them against unwilling women, to name a few of the repercussions.

And this reckless distribution of chemical abortion pills also carries an unknown impact on the environment, as human tissue and medical waste is flushed down a toilet, into America’s water system, something that we call toilet bowl abortions on campuses.

During the approval process for RU-486, an environmental impact study for the drugs focused on the impact of packaging for the drugs, rather than on the impact of human remains in our waste water system and ground water. Today, with so many lives ending by such chemical abortion pills, it’s vital to reopen an inquiry into the environmental impact on our water and land as so many human beings are being flushed away. When you consider that the Environmental Protection Agency recommends against flushing tampons to preserve the environment and water safety, how much more significant is disposing of human remains through the waste water systems across America?

As the American Academy of Family Physicians observes, “Home based health care can create medical waste which can be hazardous if not disposed properly.”

The college students who work with us have tremendous concern about the environment, and as states such as California push forward a policy to require distribution of chemical abortion drugs...
on campuses, such students will be exposed to blood and human tissue in the dorms and other student housing as will those who work in school physical plants and in maintenance.

Surely this raises concerns for the FDA, which is required under the National Environmental Policy Act of 1969 to consider “the environmental impact of its actions.”

As you know, “(a)n Environmental Assessment (EA) serves to provide sufficient evidence and analysis for an agency to determine whether significant environmental impacts may occur from the proposed action. While an EA is usually prepared by the applicant (i.e., drug sponsor or feed additive petitioner), the FDA is ultimately responsible for its scope and content.” Given the increasing scope of chemical abortions, the impact on the environment of human remains in the water system should be closely evaluated.

At SFLA and SFLAction, we respect the long hours and tireless service of those at the FDA working to address solutions to the coronavirus crisis. But part of the fallout from COVID-19 is an effort, on multiple fronts, by those who profit from abortion to end common-sense health and safety standards for chemical abortion pills.

The voices of those who want deregulation of chemical abortion have been loud and politically connected, and we wish to share with you the perspective of those who oppose the reckless distribution of chemical abortion pills that prioritizes the desires of abortion vendors over patient safety. I look forward to hearing from you and presenting you with a petition from students from across the country who don’t want to see their generation suffer so that abortionists can drop a few pills in the mail, deposit their profits and walk away from the consequences.

Sincerely,

Kristan Hawkins  
President  
Students for Life of America  
Students for Life Action

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