

TESTIMONY OF
THE REVEREND MITCHELL C. HESCOX
President and CEO
Evangelical Environmental Network

“A CHRISTIAN PERSPECTIVE ON THE COSTS OF MERCURY TO HUMAN HEALTH AND WELLBEING”
Before the
ENERGY AND POWER SUBCOMMITTEE
of
ENERGY AND COMMERCE COMMITTEE
U.S. HOUSE OF REPRESENTATIVES
FEBRUARY 8, 2012

“Because human life is not a political or economic commodity. And defending life is not a matter of party ... it’s about standing on principle.

“These two founding principles, life and liberty, are intertwined. Together, they form the core of our national character. They comprise the standard by which the world looks to us. When we affirm the dignity of life, we affirm our commitment to freedom. When we don’t affirm life ... when life is cheapened or weakened, here or abroad, freedom itself is diminished.

*– The Honorable John Boehner,
Speaker of The House of Representatives,
March for Life Rally
January 23, 2012*

The Honorable Speaker of The House John Boehner’s words just two weeks ago at the March for Life rally express values I hold dear, values that help bring me here today. Life, especially protecting our unborn children and infants, should not be a “matter of party or economic commodity.” Protecting life and providing the opportunity for abundant life must be a matter of principal and morality.

Luke 18:15-16 (ESV)

¹⁵Now they were bringing even infants to him that he might touch them. And when the disciples saw it, they rebuked them. ¹⁶But Jesus called them to him, saying, "Let the children come to me, and do not hinder them, for to such belongs the kingdom of God.

Children are a precious gift from God and are among the most vulnerable members of our society. Christian Scripture demands we protect the vulnerable, and yet we gather here today to choose in effect if protecting our unborn children and newborns from mercury pollution from the largest domestic source, coal-burning power plants, is in our national interest and in keeping with our national character. Are we as a nation willing to protect our children or hinder them? Mercury is a neurotoxin whose impacts on unborn and newborn children pose significant costs to them and society. A recent medical paper from the National Institutes of Health states:

Mercury is a highly toxic element; there is no known safe level of exposure. Ideally, neither children nor adults should have any mercury in their bodies because it provides no physiological benefit.¹

Even slight increases in environmental exposure to mercury may lead to adverse effects on nervous system development.² In addition, the American Academy of Pediatrics stated:

We agree with the strong evidence the EPA provides to support their decision that the proposed rule is both appropriate and necessary to protect public health ...³

In the past year, the National Association of Evangelicals (NAE), The United States Conference of Catholic Bishops (USCCB), and the Evangelical Environmental Network (EEN), have joined together to support a federal mercury standard that would protect our unborn children and infants across the country. Affirming our positions are several documents, including a statement from senior evangelical leaders entitled ***An Evangelical Call To Stop The Poisoning of Our Unborn***, and a letter from the Catholic Bishops' Conference to Environmental Protection Agency (EPA) Administrator Jackson. In the letter, Bishop Blaire stated,

While there are short-term costs involved in implementing this standard, the health benefits of such a rule outweigh these costs. Therefore, we welcome the EPA's proposal of a national standard to significantly reduce

toxic air pollution and call upon our leaders in government and industry to act responsibly, justly, and rapidly to implement such a standard.

We represent two different Christian traditions; however, we are united to protect life, a sacred gift from God, both before and after birth.

Psalm 139:13 (ESV)

***¹³For you formed my inward parts;
you knitted me together in my mother's womb.***

Anything that threatens and impedes life, especially impacts on the unborn and young children, is contrary to our common beliefs and values and exacts a moral toll on the nation's character.

According to data from the Centers for Disease Control, approximately 1 in 6 children in the United States are born with threatening levels of mercury.⁴ Another medical research study places the number on children affected at roughly fifteen (15) percent.⁵ Mercury impairs neurological development, lowers IQ, and is linked to cardiovascular disease and a host of other potential adverse health impacts. Over 1000 published medical journal articles verify mercury's health impacts.⁶ These adverse conditions result from eating foods containing methylmercury, primarily contaminated fish. Mercury deposition and entrance into the food chain is also well documented, as is the fact that 50% of our domestic mercury sources remain coal-fired utilities.

The most at risk and vulnerable are unborn children and infants, mainly because the body's natural defense, the blood brain barrier, is not yet fully developed. Pregnant women who consume fish and shellfish contaminated with mercury transmit such mercury to their developing unborn child, and infants can ingest mercury in breast milk. Unlike adults, unborn children have no way to excrete mercury. The toxin just keeps circulating inside their mother's womb increasing their exposure. Medical research indicates that mercury cord blood is twice that of their mothers' blood.⁷ Therefore, even if a mother's blood remains below "risk level"

doses, the unborn child's may not. Mercury poisoning of our children is just not a statistic; it's our children.

The threat of mercury is present across our country. According to the latest EPA Toxic Release Inventory, Texas produces approximately 17 % of the United States mercury emissions from coal-fired utilities, over 11,000 pounds in 2010, an increase over 2009.⁸ Using EPA guidelines, fifty-one percent of North Texas reservoirs had largemouth bass above the recommended mercury limits.⁹ Texas is not alone. The 2010 *Biannual National Listing of Fish Advisories* states that approximately 17 million acres of lakes and 1.3 million miles of rivers, over 40% of our fresh waters, have mercury advisories, an increase of 1.1% (lakes) and 0.2% (rivers) from 2008.¹⁰ All fifty (50) states have at least one mercury fish consumption advisories. It's simply not safe to eat locally caught fish in much of the United States, especially if you are a woman who is pregnant or nursing.

As part of his Christian witness, EEN staff member Ben Lowe chooses to live in a low-income community in DuPage County, IL. Many of his neighbors fish regularly to provide protein for their families. Ben, an avid angler, reports an event while fishing in the Chicago River. Knowing the river had fish consumption advisories, Ben was about to release his catch, when a man walked up and asked for it, to feed his family. Ben attempted to explain that the fish was full of toxins such as mercury, which would hurt his children. It's ok, the man said, they need the food. Ben ended up giving him the fish, but no, it is not ok. Nowhere in America should a family have to choose between eating poison and going hungry.

Ben's story is not unique. Last spring, we had a family outing to Valley Forge National Park. My daughter-in-law is a photographer, and as we passed the covered bridge, she asked for a photo. We walked around the bridge and right there was a sign posted, "Attention All

Fishermen – No Fish May be Killed or Held in Possession From This Stream.” Just 30 feet away, a man was fishing. Returning home, we went to the Pennsylvania Fish Advisory Website and learned mercury and PCB’s poisoned the stream. A colleague, Hispanic Pastor Frank Machado, shared how his family once depended on locally caught fish for a source of protein. Now he is afraid of even taking his sons fishing in Pennsylvania because of the mercury warnings.

Our children pay the greatest cost of mercury pollution. But such costs also accrue to society. One study estimates the base cost for methylmercury toxicity of \$5.1 billion in 2008 between a range of \$3.2 of \$8.4 billion.¹¹ The authors compare the economic benefits of eliminating mercury pollution to the benefits gained from lead regulation:

Similarly [to lead], great economic savings can be achieved by preventing methylmercury contamination of fish, which is the major source of human exposure to this chemical.¹²

The EPA’s Mercury and Air Toxics Standard, the so-called “utility-MACT” rule, will cost some \$9.6 billion per year according to the agency¹³. However, the EPA also estimates that for every \$1 spent complying with this rule, society will reap between \$5-9 in return.¹⁴

Some may point out that the poor will be most affected in higher electric rates. In certain areas, it could add \$7.00¹⁵ per month to electric bills, with the national average increase \$3 to \$4 per month.¹⁶ Considering that the average electric bill has declined over twenty (20%) in real terms since 1980¹⁷, most Americans, we suggest, would agree that it is worth \$84.00 per year to protect our children. Nevertheless, for those for whom this might prove a hardship, we are happy to work with private parties and government to ensure that the poor are helped through energy efficiency, public policy, or any number of possibilities.

Small business owners’ understand the value of health benefits provided by environmental protection. In a recently released study, “79% of small business owners support

having clean air and water in their community in order to keep their family, employees, and customers healthy, and 61% support standards that move the country towards energy efficiency and clean energy”.¹⁸

Our Network and those we work with in the faith community, including the National Association of Evangelicals and the United States Conference of Catholic Bishops, are thankful for recently finalized National Mercury and Air Toxics Standards and their life-saving benefits from mercury, particulates, and acid gases. In a public release after the MATS’ promulgation Bishop Stephen Blaire of USCCB stated:

The U.S. Catholic bishops welcome this important move by the Administration to adopt long-awaited standards to reduce mercury and toxic air pollution from power plants and to protect children’s health. In the end it just makes good sense to want to have clean air for our children and families to breathe and for future generations.

This regulation is a fair and uniform standard to address a powerful threat to our children.

As a father and now a grandfather, this is personal. It is also central to the Evangelical Environmental Network’s ministry of creation care, because for us creation care is a matter of life. We understand the gift of creation as a sustainable gift empowering and providing for human life.

Exposing children to mercury poisoning in their mother’s womb, a poisoning that will last a lifetime, is simply wrong. We have it within our means to reduce 90% of the mercury emitted from coal-burning power plants without the fear of diminished electric reliability or job loss, and with economic benefits at least five times greater than the cost.

We’ve waited since the 1990 Clean Air Act for our country to clean up mercury from the burning of fossil fuels. It is well past time to act –no more delays or special treatment of one industry over another¹⁹. Let us live up to our nation’s character and protect the vulnerable

from mercury pollution emitted by coal-burning power plants. We urge this Subcommittee and the entire Congress to protect our children by supporting this regulation. Today's world provides enough threats to our children's future. Let's not endanger our children with a substance we can control. We must protect the weakest in our society, the unborn, from mercury poisoning. As the Psalmist says:

Psalm 82:3 (ESV)

**Give justice to the weak and the fatherless;
maintain the right of the afflicted and the destitute.**

¹ Stephan Bose-O'Reilly, MD, MPH, Kathleen M. McCarty, ScD, MPH, Nadine Steckling, BSc, and Beate Lettmeier, PhD, "Mercury Exposure and Children's Health", *Curr Probl Pediatr Adolesc Health Care*. 2010 September; 40(8): 186-215. doi:10.1016/j.cpped.2010.07.002. See also National Academy of Sciences, *Toxicological Effects of Methylmercury* (2000): 13-14.

² Grandjean, Phillippe, Hiroshi Satoh, Katsuyuki Murata, and Komyo Eto, "Adverse Effects of Methylmercury: Environmental Research Implementations", *Environ Health Perspect* 118:1137-1145.

³ <http://www.lungusa.org/get-involved/advocate/advocacy-documents/epa-mercury-other-health.pdf>

⁴ Mahaffey et al., "Blood Organic Mercury and Dietary Mercury Intake" *Environmental Health Perspectives*, 112, #5 (April 2004).

⁵ Trasande, et al., "Public Health and Economic Consequences of Methyl Mercury Toxicity to the Developing Brain," *Environmental Health Perspectives*, Vol. 113, No. 5 (May 2005): p. 590.

⁶ Grandjean, Phillippe, Hiroshi Satoh, Katsuyuki Murata, and Komyo Eto, "Adverse Effects of Methylmercury: Environmental Research Implementations", *Environ Health Perspect* 118:1137-1145.

⁷ Lederman, Sally Ann, Robert L. Jones, Kathleen L. Caldwell, Virginia Rauh, Stephen E. Sheets, Deliang Tang, Sheila Viswanathan, Mark Becker, Janet L. Stein, Richard Y. Wang, and Frederica P. Perera, Relation between Cord Blood Mercury Levels and Early Child Development in a World Trade Center Cohort, *Environmental Health Perspectives*, VOLUME 116, NUMBER 8, August 2008:1085-1091.

⁸ EPA website, <http://www.epa.gov/mercury/about.htm>. Data from the 2005 National Emissions Inventory.

⁹ Drenner, Ray W., Matthew M. Chumchal, Stephen P. Wentz, Mandy McGire, and S. Matthew Drenner, "Landscape-Level Patterns of Mercury Contamination of Fish in North Texas, USA", *Environmental Toxicology and Chemistry*, 2011 SETAC, DOI: 10.1002/etc.589

¹⁰ <http://water.epa.gov/scitech/swguidance/fishshellfish/fishadvisories>

¹¹ Leonardo Trasande and Yinghua Liu, Reducing The Staggering Costs Of Environmental Disease In Children, Estimated At \$76.6 Billion In 2008, *Health Affairs*, 30, no.5 (2011):863-870

¹² Ibid.

¹³ EPA FACT SHEET: Mercury and Air Toxics Standards -BENEFITS AND COSTS OF CLEANING UP TOXIC AIR POLLUTION FROM POWER PLANTS, downloaded from:

<http://www.epa.gov/mats/pdfs/20111221MATSimactsfs.pdf>

¹⁴ Ibid.

¹⁵ Evangelical Environmental Network internal estimate of monthly consumer cost in highest abatement areas.

¹⁶ EPA Proposed Rule Factsheet: <http://www.epa.gov/airquality/powerplanttoxics/pdfs/overviewfactsheet.pdf>

¹⁷ McCarthy, James E., EPA's Utility MACT: Will the Lights Go Out?, Congressional Research Service, January 9, 2012, 7-5700.

¹⁸ Small Business Owners' Opinions on Regulations and Job Creation, February 1, 2012; downloaded from http://www.asbcouncil.org/uploads/Regulations_Poll_Report_FINAL.pdf

¹⁹ McCarthy. James E. and Claudia Copeland, "EPA's Regulation of Coal Fired Power: Is a 'Train Wreck' Coming", Congressional Research Service, August 8, 2011, 7-5700

An Evangelical Call to Stop the Mercury Exposure of the Unborn

Our commitment to Jesus Christ compels us to do all we can to protect unborn children from mercury poisoning.

“Jesus said, ‘Let the little children come to me, and do not hinder them, for the kingdom of heaven belongs to such as these.’” (Matthew 19:14)

“For you created my inmost being; you knit me together in my mother’s womb.” (Psalm 139:13)

As evangelical Christians, we believe that all human life is sacred; that each person conceived is of equal and innate value and dignity, and that all human life is worthy of protection.

We are thankful for the many benefits provided by our modern, advanced economy, including vastly improved health care. We recognize, however, that our economic progress has been accompanied by considerable environmental degradation. For example, approximately half of our electricity is generated in coal-fired power plants that emit many toxic pollutants, including mercury. Such power plants are the largest domestic source of mercury pollution, helping to create a situation where one out of six babies born in the U.S. has harmful levels of mercury in their blood.¹

The Clean Air Act was signed into law over 40 years ago by President Richard Nixon, with significant amendments signed by President George H. W. Bush in 1990. The law as amended provides, among other things, for the protection of all people, and especially pregnant mothers and unborn children, from mercury pollution generated by power plants. Yet until recently, court challenges have tied the hands of those charged with protecting our air quality.

Mercury emitted from power plants drops from air to earth and presently contaminates over 6 million acres of freshwater lakes, 46,000 miles of streams, and 225,000 wetland acres across the U.S. Every state has a fish consumption advisory. Mercury contaminated fish are often eaten by pregnant women. Mercury and other heavy metal toxins pass across the mother’s placenta and enter the bloodstream of her unborn child. A protective shield around the developing child’s brain is not fully formed until the first year of life. Mercury easily crosses into the developing child’s brain causing brain damage, developmental disabilities, neurological disorders, lowered intelligence, and learning difficulties.

On March 16, 2011, the Environmental Protection Agency (EPA) issued the proposed Mercury and Air Toxics Standards. Finally, more than 20 years after the 1990 Clean Air Act amendments were passed, the courts have cleared the way for the issuance of regulations protecting our

communities from mercury pollution. These standards when applied are expected to reduce emissions of mercury from power plants by 91 percent.

Opponents of the mercury standards are seeking to weaken or delay the regulations. They argue that the cost of cleaning up our air (about \$3-7 per month per family) is too expensive. We welcome an honest debate about how much our children's health is worth. We believe that our families, and particularly the unborn who are most at risk, deserve protection. We support efforts to safeguard pregnant mothers and our unborn and newborn children from the neurological health risks associated with mercury poisoning.

As an essential step in protecting the vulnerable from mercury pollution, we call upon our leaders in government and industry to act responsibly and humanely, and to implement effective regulations that reduce at least 90% of mercury emissions from power plants without further delay. Our children have already waited far too long for this protection.

¹ See Kathryn R. Mahaffey et al., "Blood Organic Mercury and Dietary Mercury Intake: National Health and Nutrition Examination Survey, 1999 and 2000," *Environmental Health Perspectives*, 112, No. 5 (April 2004): <http://ehp.niehs.nih.gov/members/2003/6587/6587.html>, and Leonardo Trasande, et al., Public Health and Economic Consequences of Methyl Mercury Toxicity to the Developing Brain, *Environmental Health Perspectives*, Vol. 113, No. 5 (May 2005): p. 593; <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257552/pdf/ehp0113-000590.pdf>. The 1-in-6 figure, taken from her peer-reviewed research, was used by Mahaffey in a presentation she made while she was the EPA's top mercury scientist. See <http://www.epa.gov/waterscience/fish/forum/2004/presentations/monday/mahaffey.pdf>.

An Evangelical Call to Stop the Mercury Poisoning of the Unborn Signatories

All signatories do so as individuals expressing their personal opinions and not as representatives of their organizations unless indicated.

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Alexandria Bennett, Sustainability Coordinator, Point Loma Nazarene University, San Diego, CA

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Rev. Pat Chen, Founder & President, Love Ministries International; The White House & Capitol Hill Prayer Initiative, San Ramon, CA

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Rev. Kim Sandelin, Executive Director, Love in the Name of Christ of Kalamazoo County, Kalamazoo, MI

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Rev. Tyler Wigg-Stevenson, Founder & Director, Two Futures Project, Nashville, TN

Rev. Dr. Cecelia Williams-Bryant, Senior Episcopal Supervisor, Fourth Episcopal District, African Methodist Episcopal Church, Chicago, IL

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Committee on Domestic Justice and Human Development

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June 20, 2011

Lisa P. Jackson
Administrator
U.S. Environmental Protection Agency
Washington, DC 20460

Subj: Docket ID No. EPA-HQ-OAR-2011-0044
Docket ID No. EPA-HQ-OAR-2009-0234

Dear Administrator Jackson:

I write on behalf of the United States Conference of Catholic Bishops (“Conference”) to welcome and comment on recently proposed Mercury and Air Toxics Standards that would reduce hazardous air pollution from power plants. The Conference supports a national standard to reduce such pollution. Such standards should protect the health and welfare of all people, especially the most vulnerable members of our society, including unborn and other young children, from harmful exposure to toxic air pollution emitted from power plants.

While we are not experts on air pollution, our general support for a national standard to reduce hazardous air pollution from power plants is guided by Catholic teaching, which calls us to care for God’s creation and protect the common good and the life and dignity of human persons, especially the poor and vulnerable, from conception until natural death. As we articulated in *Putting Children and Families First*: “For generations, the Catholic community has reached out to children... We have defended their right to life itself and their right to live with dignity, to realize the bright promise and opportunity of childhood.”

Children, inside and outside the womb, are uniquely vulnerable to environmental hazards and exposure to toxic pollutants in the environment. Their bodies, behaviors and size leave them more exposed than adults to such health hazards. Furthermore, since children are exposed to environmental hazards at an early age, they have more extended time to develop slowly-progressing environmentally triggered illnesses.

It is well known that power plants are the largest source of mercury and other toxic air pollution in the United States. In addition to mercury and arsenic, power plants emit lead, other heavy metals, dioxins and acid gases. It is reported that even in small amounts these harmful air pollutants in the environment are linked to health problems, particularly in children before and after birth, the poor and the elderly. These problems apparently include asthma, cancer, heart disease, learning disabilities, brain damage, and other illnesses that adversely affect childhood development.

Toxic air pollution from power plants causes great harm to the environment, to the food chain, and to humans. Scientists tell us mercury emitted from power plants contaminates our lakes, streams, rivers and fish. People are primarily exposed to mercury by eating contaminated fish. This is of particular concern for pregnant women and their unborn and newborn children since mercury exposure can interfere with children’s developing nervous systems, impairing their ability to think and learn. According to research, one out of six babies born in the U.S. has harmful levels of mercury in his or

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her blood.ⁱ Fish advisories have been issued across the United States warning against fish consumption from local waters as a result of mercury contamination.ⁱⁱ

A national standard limiting mercury and other toxic air pollution represents an important opportunity to protect the health and welfare of all people, especially our children and poor and vulnerable communities. Applying such a standard would reduce emissions of mercury from power plants by 91 percent marking a significant step forward. Some may attempt to weaken this proposed standard. However, we believe we ought to take prudent and responsible action to protect our children.

We do not make these comments unaware of the broad economic reality. Our country continues to struggle with persistently high unemployment and stagnant economic growth that is not nearly sufficient to meet the needs of vulnerable workers and families. EPA's analysis finds that the employment impacts of this rule are expected to be small.ⁱⁱⁱ Implementation of such a rule should attempt to mitigate the potential effects on the workforce and protect poor and vulnerable communities while maintaining a clear priority for health and well-being. EPA and others involved in implementing this rule should work to ensure that any additional costs generated by implementation of the rule are allocated according to capacity to bear such burdens. Poor and vulnerable people and their communities must not be asked to bear a disproportionate share of the effects of toxic air pollution or the cost burden of implementing such a rule.

While there are short-term costs involved in implementing this standard, the health benefits of such a rule outweigh these costs.^{iv} Therefore, we welcome the EPA's proposal of a national standard to significantly reduce toxic air pollution and call upon our leaders in government and industry to act responsibly, justly, and rapidly to implement such a standard.

Sincerely,



Most Reverend Stephen E. Blaire
Bishop of Stockton
Chairman, Committee on Domestic Justice and Human Development

ⁱ See Kathryn R. Mahaffey et al., "Blood Organic Mercury and Dietary Mercury Intake: National Health and Nutrition Examination Survey, 1999 and 2000," *Environmental Health Perspectives*, 112, #5 (April 2004): <http://ehp.niehs.nih.gov/members/2003/6587/6587.html>, and Leonardo Trasande, et al., Public Health and Economic Consequences of Methyl Mercury Toxicity to the Developing Brain, *Environmental Health Perspectives*, Vol. 113, No. 5 (May 2005): p. 593; <http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257552/pdf/ehp0113-000590.pdf>. The 1-in-6 figure, taken from her peer-reviewed research, was used by Mahaffey in a presentation she made while she was the EPA's top mercury scientist. See <http://www.epa.gov/waterscience/fish/forum/2004/presentations/monday/mahaffey.pdf>.

ⁱⁱ American Lung Association, Emissions of Hazardous Air Pollutants from Coal-Fired Power Plants. Prepared by Environmental Health & Engineering, Inc., March 7, 2011, p.18. Available at: <http://www.lungusa.org/assets/documents/healthy-air/coal-fired-plant-hazards.pdf>

ⁱⁱⁱ U.S. Environmental Protection Agency, Regulatory Impact Analysis for the Utility Air Toxics Rule, Final Report, March 29, 2010, p. 9-15. Available at: http://www.epa.gov/ttn/atw/utility/ria_toxics_rule.pdf

^{iv} U.S. EPA *ibid*, p. 1-1



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BISHOPS WELCOME NEW MERCURY AND AIR TOXICS STANDARDS TO PROTECT HUMAN LIFE AND GOD'S CREATION

December 21, 2011

WASHINGTON—"A new national standard to reduce mercury and toxic air pollution from power plants is an important step forward to protect the health of all people, especially unborn babies and young children, from harmful exposure to dangerous air pollutants," said the U.S. bishops' domestic policy chairman in response to the Environmental Protection Agency's (EPA) announcement of a new rule limiting hazardous air pollution.

Recently finalized Mercury and Air Toxics Standards will reduce toxic air pollution from coal- and oil-fired power plants that are the largest source of mercury pollution in the United States. Many of these pollutants are linked to health problems, particularly in children before and after birth, the poor and the elderly.

"The bishops welcome this important move by the Administration to adopt long-awaited standards to reduce hazardous air pollution and protect children's health," said Bishop Blaire. "In the end it just makes good sense to want to have clean air for our children and families to breathe and for future generations."

Bishop Blaire is chairman of the Committee on Domestic Justice and Human Development of the U.S. Conference of Catholic Bishops (USCCB). He also cited Catholic teaching on the protection of the environment and the need to protect human life and dignity at all stages.

"Children, inside and outside the womb, are uniquely vulnerable to environmental hazards and exposure to toxic pollutants in the environment," he said. "Their bodies, behaviors and size leave them more exposed than adults to such health hazards."

Bishop Blaire had earlier commented on the proposed rule in a June 20 letter to the EPA. The text of the letter can be found at

<http://www.usccb.org/about/general-counsel/rulemaking/upload/comments-to-epa-on-mercury-2011-06.pdf>

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