

April 2, 2010

Honorable Barbara Boxer
Chair, Environment and Public
Works Committee
U.S. Senate
Washington, DC 20510

Honorable Frank R. Lautenberg
Chair, Superfund, Toxics, and
Environmental Health Subcommittee
U.S. Senate
Washington, DC 20510

Honorable Henry A. Waxman
Chair, Energy and Commerce
Committee
U.S. House of Representatives
Washington, DC 20515

Honorable Bobby L. Rush
Chair, Commerce, Trade, and
Consumer Protection Subcommittee
U.S. House of Representatives
Washington, DC 20515

Dear Senators Boxer and Lautenberg and Representatives Rush and Waxman:

On behalf of the signing 20 health professional organizations, representing millions of health professionals, we are writing to express our support for a strengthened chemical management system that better protects human and environmental health. We are encouraged by the collective call from the Obama Administration, chemical industry, and environmental health advocacy organizations to strengthen the federal laws governing industrial chemicals. Health professional organizations, including the American Medical Association, state medical associations, American Nurses Association, state nurses associations, and American Public Health Association, have all passed resolutions calling for the need to reform how chemicals are regulated in the United States.

Healthy communities and a healthy environment are critical to the health and wellness of every person. Yet, people are exposed every day to a complex mixture of industrial chemicals, some of which are linked to increases in disease and conditions such as cancers, birth defects, and infertility¹. The U.S. Centers for Disease Control and Prevention has measured hundreds of chemicals in urine and blood samples of Americans, finding widespread human exposure to flame retardants, perfluorinated compounds, phthalates, heavy metals, and other chemicals.²

While the evidence linking chemical exposures to negative health outcomes continues to rise, the federal laws created to protect the public from hazardous chemicals remain inadequate. Independent reviews have found that the thirty-four year-old law governing industrial chemicals, the Toxic Substances Control Act (TSCA), does not:

- require adequate testing of existing and new chemicals such that we are unaware of the full hazardous profile of most chemicals;³
- regulate known toxic chemicals because TSCA doesn't give regulators adequate authority to do so;⁴
- provide incentives for safer alternatives to come to market or to require their

- use; or
- allow for sufficient public access to the limited chemical information provided by chemical manufacturers to the government.⁵

As a result of this failed system, products and their manufacture and disposal can release hazardous chemicals with the potential to harm human health and the environment.

We support your commitment to reform the failed regulatory system in order to improve environmental health. As you continue your work to strengthen TSCA, we urge you to support the following critical elements of reform:

- **Take immediate action on the worst chemicals:** Some chemicals, including persistent, bioaccumulative toxicants (PBTs), are too hazardous to continue using because of the harm they can do to human health and the environment. The U.S. Environmental Protection Agency should be given the authority to immediately phase out the use of the worst chemicals to which people can be exposed and should act upon that authority expeditiously. The U.S. EPA also should immediately act to reduce our exposure to other toxic chemicals that can cause serious health problems.
- **Require and disclose basic information for all chemicals:** Chemical manufacturers should be required to provide full information on the health and environmental hazards associated with their chemicals, how they are used, and the ways that the public or workers could be exposed. The U.S. EPA should be required to make such data easily accessible to the public.
- **Ensure chemical manufacturers demonstrate the safety of their products:** Chemical manufacturers should be required to demonstrate the safety of their products based on a health standard that explicitly requires the protection of the most vulnerable subpopulations, including developing children, workers, and pregnant women.
- **Promote safer alternatives:** There should be national support for research into green chemistry and engineering, and policies should favor safer chemicals and products over those with known health hazards.

We appreciate your leadership on this issue and look forward to working together to protect human and environmental health. If you have any questions or would like to discuss this issue further, please contact Gary Cohen, President, Health Care Without Harm, at gcohen@igc.org or (617) 524-6018.

Sincerely,

American Nurses Association
American Public Health Association
Physicians for Social Responsibility
Association of Public Health Laboratories
National Environmental Health Association
National Association of Pediatric Nurse Practitioners
Association of Community Health Nursing Educators
Association of State and Territorial Directors of Nursing
American Public Health Association's Public Health Nurse Section
Association of Reproductive Health Professionals
Alliance of Nurses for Healthy Environments
Connecticut Nurses Association
Connecticut Public Health Association
Michigan Nurses Association
Montana Public Health Association
Blue Mountain Clinic, MT
New York State Nurses
Ohio Nurses Association
Pennsylvania State Nurses Association
Washington State Nurses Association

cc: Senate Environment and Public Works Committee members
House Energy and Commerce Committee members
Administrator Lisa Jackson, Environmental Protection Agency
Steve Owens, Assistant Administrator for the Office of Prevention, Pesticides,
and Toxic Substances (OPPTS), Environmental Protection Agency
Bob Sussman, Senior Policy Counsel, Environmental Protection Agency
Nicole Buffa, White House Council on Environmental Quality
Nell McCarthy, White House Domestic Policy Council
Greg Nelson, White House Office of Public Engagement

¹ Diamanti-Kandarakis E *et al.* 2009 Endocrine-Disrupting Chemicals: An Endocrine Society Scientific Statement, *Endocrine Reviews* 30(4):293-342; P. Grandjean and P. Landrigan, "Developmental neurotoxicity of industrial chemicals," *The Lancet*, Volume 369, Issue 9564, Pp. 821-822.

² "Fourth National Report on Human Exposure to Environmental Chemicals," U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, 2009, <http://www.cdc.gov/exposurereport/pdf/FourthReport.pdf>.

³ "Chemical Hazard Data Availability Study: What Do We Really Know About the Safety of High Production Volume Chemicals?" U.S. Environmental Protection Agency, April 1998, <http://www.epa.gov/chemrtk/pubs/general/hazchem.pdf>.

⁴ “Chemical Regulation: Options Exist to Improve EPA’s Ability to Assess Health Risks and Manage Its Chemical Review Program,” GAO-05-458, U.S. Government Accounting Office, June 2005, <http://www.gao.gov/new.items/d05458.pdf>.

⁵ “Chemical Regulation: Options for Enhancing the Effectiveness of the Toxic Substances Control Act,” GAO-09-428T, U.S. Government Accounting Office, February 2009, <http://www.gao.gov/new.items/d09428t.pdf>.