

Children's Health Protection Advisory Committee

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April 10, 2007

Stephen L. Johnson, Administrator
 United States Environmental Protection Agency
 1200 Pennsylvania Avenue, N.W.
 Washington, D.C. 20460

RE: Ten Year Anniversary of the Children's Health Executive Order

Dear Administrator Johnson:

The 1997 Executive Order on Protection of Children from Environmental Health and Safety Risks calls on federal agencies to work together to protect children's health from environmental risk. In view of the tenth anniversary of the Executive Order which recognized the importance of protecting children's environmental health, the Children's Health Protection Advisory Committee (CHPAC) discussed EPA's past and future role in protecting children's health at our meeting March 13-15, 2007. We all recognize the importance of leaving the world cleaner, healthier, and safer for our children, who are more vulnerable to many pollutants than adults. This letter provides the CHPAC's views on key elements of a comprehensive vision for protecting children's health.

The CHPAC urges you to set forth a renewed EPA vision on children's environmental health for the years ahead and to make a renewed commitment to the principles embodied in the Executive Order. We are concerned that the focus on children's environmental health at EPA has diminished. Children's environmental health considerations still are not explicitly addressed in all relevant and critical Agency decisions, policies, and programs.

We have witnessed a number of successes in efforts to strengthen environmental protections for children following the Executive Order, which directed senior-level interagency leadership across the federal government to implement a national commitment to children's health. Landmark accomplishments include: initial efforts to add increased margins of safety under the Food Quality Protection Act to protect children exposed to pesticides; groundbreaking research findings resulting from the children's research centers; creation and start-up of the National Children's Study in collaboration with other federal

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agencies; development of the supplement on early life exposures to the cancer guidelines; creation of the Pediatric Environmental Health Specialty Units; new diesel standards to protect children; new tools for healthy school environments; development of smart growth principles of community design; initiating outreach to health care providers and the public; and US leadership on pediatric environmental health internationally. Many of these successes were due in large part to the excellent work of the Office of Children's Health Protection, in partnership with other agency staff and other federal agencies, in the spirit of the Executive Order.

However, EPA has not maintained its focus on children's issues and has not capitalized on the opportunity to effectively tackle a number of significant existing and emerging environmental challenges. Many American children continue to live in non-attainment areas for air pollution, and new science shows that serious health effects occur at levels below current standards. Products contain chemicals that have not been tested for their impact on human health, especially that of children. Drinking water contains contaminants that may pose risks to children. Indoor environments, including homes, schools and childcare centers, contain a number of health risks to our children that are not being sufficiently addressed. Many communities have limited opportunities for children to walk or bike to school, to play in parks and green spaces, and to swim in clean waterways. Emerging science is demonstrating that even very low-level exposures to some toxicants may affect children's health. States and localities are wrestling with how best to address exposure to pollutants in fish through consumption advisories. Sources of pollution from energy production, be they coal, automobile emissions, industrial facilities or waste disposal, continue to present significant health risks to our nation's children. The September 11 terrorist attack and Hurricane Katrina demonstrate a need for an EPA and interagency effort to address the needs of children in a broad concept of environmental preparedness. Finally, the threat of global climate change poses special challenges for children, for not only are children more vulnerable to the impacts of climate change, but they face a large future burden due to climate change. These challenges are opportunities for leadership.

In addition to these broad opportunities for EPA leadership on children's environmental health, there are cases in which EPA has not followed through on its initiatives to protect children. For example, the Agency has not implemented its 2005 *Guidelines for Cancer Risk Assessment and Supplemental Guidance on Risks from Early-Life Exposure*, or its 2006 *Framework for Children's Risk Assessment*. EPA's initiative to evaluate the adequacy of toxicology databases on common industrial chemicals with respect to children's risk, the Voluntary Children's Chemicals Evaluation Program or VCCEP, is not on track and has been of very limited utility (CHPAC, June 2006).

Bearing in mind that the physical, chemical, biological, and psychosocial environments that children experience before birth, early in life and through adolescence may have life-long consequences and may affect subsequent generations, the CHPAC urges you to consider the following key elements as you renew EPA's commitment and craft the Agency's vision to protect children. We ask EPA to use its leadership and expertise, in collaboration with other federal agencies, to:

- Ensure healthy environments where our children live, learn and play;
- Eliminate environmental health disparities;
- Expand critical research to address environmental impacts on children;
- Strengthen the national approach to regulating chemicals and promoting safe alternatives;
- Foster environmental preparedness and prevention for children's health;

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- Institute "environmental health literacy" across America; and finally
- Commit the necessary EPA infrastructure, and inter-agency collaboration, to implement the renewed vision.

Examples of possible areas of action within each element are noted briefly below. Improvement in many of these areas will require EPA to work with other federal, and state and local agencies.

Ensure Healthy Environments Where Our Children Live, Learn and Play

The Agency should ensure that children are protected in and around their homes, schools, childcare centers, playgrounds and workplaces. Children should also be explicitly considered when planning, constructing and remodeling the buildings and communities where they live, learn, explore, and grow. In addition, all EPA regulations should take into account the unique susceptibilities of children. For example, the setting of health-based National Ambient Air Quality Standards needs to give greater weight to the latest science on air pollution impacts on children's health. EPA should continue and expand effective voluntary programs that capitalize on the desire of society to reduce and eliminate harmful exposures to children, such as Clean School Bus USA, Schools Chemical Cleanout Campaign, Indoor Air Quality Tools for Schools Program, and EPA's Healthy School Environments Assessment Tool (HealthySEAT).

Eliminate Environmental Health Disparities

EPA needs to partner with others to create better approaches to eliminate environmental health disparities including asthma prevalence, proximity to hazardous waste sites and highways, and lead and pesticide exposures. EPA must address the particular environmental health concerns of children in populations at higher risk, such as inner city, rural, Native American, subsistence fisher, migrant, farmworker, and immigrant communities. EPA should build stronger cross-agency connections to address the broad range of environmental health issues that disproportionately affect low-income and minority children.

Expand Critical Research to Address Environmental Impacts on Children

Applied and translational research is critical to advancing children's environmental health. EPA should make children central to an expanded, well-funded research agenda. With new methods and data, we could better understand the effects on children of multiple exposures to environmental pollutants at all life stages. In addition, EPA should continue to support and expand the children's research centers and the National Children's Study. The Agency should continue to foster the development and improvement of biomonitoring methods for very young children and correlate the results to environmental exposures. It is important to expand EPA's research to understand dangers posed by emerging chemicals of concern. Research efforts could be conducted in partnership with HHS and other agencies to better understand and address a set of child-related health conditions that may have an environmental component, such as asthma, learning and developmental disabilities, obesity, and childhood cancers. Similar efforts to better understand the impacts of the built environment on children's health are warranted. The Agency needs to ensure the highest ethical conduct of environmental health research involving children.

Strengthen National Approach to Regulating Chemicals and Promoting Safe Alternatives

The time has come for EPA, and the nation, to address the flaws in our chemical regulatory approach. EPA must put children at the center of a comprehensive and integrated regulatory scheme that operationalizes what we know about existing chemicals and what we are learning from emerging science. EPA also needs to better utilize data from research, biomonitoring, and

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cumulative exposure studies in chemicals management. EPA should consult with other federal agencies and international institutions to craft effective regulations and incentives that ensure products are safe and do not include lead, mercury, phthalates, or other chemicals at levels likely to cause harm to children.

Foster Environmental Preparedness and Prevention for Children's Health

Children will suffer disproportionately from climate change and its consequences. It is imperative that EPA address how climate change uniquely affects children and take preventive steps to mitigate this significant threat to the globe. We also must prepare for the consequences of natural disasters and terrorism, events that often present specific children's environmental health issues. These events have environmental health components that neither planners nor all responders have been trained to address.

Institute Environmental Health Literacy for Families across America

An informed and engaged public is vital to the success of improving environmental health of children and their families. EPA should protect and expand community right-to-know efforts. The public can take many effective actions to limit and eliminate exposures, and often turn to health professionals and local and state health agencies for information. EPA should expand its public education and outreach to health professionals and agencies and include child-specific information such as: the special needs of children during disasters; effects of climate change on children; and the steps families can take to reduce their children's exposure to toxic chemicals including prenatal exposures. The Pediatric Environmental Health Specialty Units have demonstrated success and should be expanded nationally and fully funded. EPA must work with other federal Agencies in a timely fashion to create a national fish consumption advisory for multiple contaminants. Reporting on indicators is key in building our national environmental health literacy and should therefore be expanded in coordination with other agencies with improved on-line access, regional and local data, and data for the early childhood years. Public outreach should utilize effective materials for low literacy and non-English speaking populations.

Commit the Necessary EPA Infrastructure, and Cross-agency Collaboration, to Implement the Renewed Vision

Finally, it is vital to have a vibrant and effective infrastructure and strong leadership to carry forward the renewed vision for children at EPA. We remain deeply concerned over the lack of a permanent Director for the last five years of the Office of Children's Health Protection (OCHP), now the new Office of Children's Health Protection and Environmental Education (OCHPEE). In addition, we are troubled by the apparent reductions in funding for children's environmental health protection due first to the addition of the aging initiative and most recently the merger with the Office of Environmental Education (creating the OCHPEE). In order to make a renewed vision a reality, there must be strong leadership and adequate resources. EPA can lead the revival of government-wide activity and collaboration to protect children in order to realize the spirit of Executive Order 13045 across the Executive Branch. This should include uncovering and addressing gaps in programs and services for children's environmental health protection.

In addition to ethical and scientific arguments for focusing on children's health, we recognize that children are also the cornerstone of "American competitiveness." Economic competitiveness incorporates the ability to compete internationally and to grow domestically. Research clearly indicates that countries with more educated, healthier populations experience higher rates of

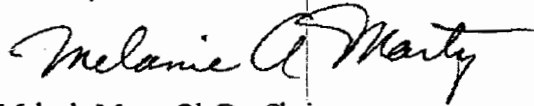
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economic growth. The direct health care costs of pollution-related illness and disability among children divert significant resources from activities that would enhance competitiveness and improve the lives of all Americans. By protecting our children today we are investing in America's future and securing America's competitiveness.

We hope that you will adopt this vision and launch a national effort of stakeholder involvement over the next year to craft EPA's children's health agenda. EPA could provide leadership on a comprehensive vision of children's environmental health to other federal agencies as well; therefore, we encourage you to reinvigorate children's environmental health at EPA and lead such an effort across the Executive Branch.

As always, we would welcome the opportunity to discuss your vision of children's environmental health, and hope that you could join us at our next CHPAC meeting in July.

Sincerely,



Melanie Marty, Ph.D., Chair
Children's Health Protection Advisory Committee

Cc: Dr. William Sanders, Acting Director
Office of Children's Health Protection and Environmental Education