



November 17, 2011

United States Senate
Washington, DC 20510

Re: Invitation to Attend Senate Staff Briefing on the Impacts of Mercury on Unborn Children

Dear Senator:

The United States Conference of Catholic Bishops, the Evangelical Environmental Network, and the National Association of Evangelicals **invite you and your staff to attend a briefing on the moral and public health impacts of mercury exposure on unborn and young children.** Senator Robert Casey is expected to provide opening remarks at the briefing. **The briefing will take place on November 30th from 10:00 a.m. to 11:00 a.m. in room 200 of the Senate Visitor Center.**

We hope you will take this opportunity to learn more about how unborn and newborn children are uniquely vulnerable to exposure to toxic air pollution such as mercury. For our faith communities, protecting human life and caring for creation is a moral imperative.

It is well known that power plants are the largest source of mercury and other toxic air pollution in the United States. It is reported that even in small amounts mercury is linked to health problems, particularly in children. Mercury exposure can interfere with children's developing nervous systems, impairing their ability to think and learn. Reliable scientific research clearly states that one out of six newborn children in the United States is at risk due to harmful levels of mercury in the blood. All fifty states have issued fish advisories warning against fish consumption from local waters as a result of mercury contamination.

We believe a national standard to reduce mercury and other toxic air pollution from power plants is needed to protect the health of unborn and young children.

We hope you will join us for this briefing and in our commitment to protect unborn and young children from hazardous mercury pollution.

Sincerely,

The Rev. Mitchell C. Hescox
President
Evangelical Environmental Network

Galen Carey
Vice President, Government Relations
National Association of Evangelicals

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

An Evangelical Call to Stop the Mercury Exposure of the Unborn

The Honorable
Senate Office Building
Washington, DC

November 7, 2011

Dear Senator

Thank you for your service to our country.

On behalf of the Evangelical Environmental Network (EEN) and over 120 national leaders who have signed *An Evangelical Call to Stop The Mercury Poisoning of the Unborn*,¹ **I request that you and your staff meet with senior EEN staff** to discuss the Environmental Protection Agency's (EPA's) Utility MACT rule. We would like to explain why **we would like you to do everything in your power to protect the unborn from attempts to delay or abolish the EPA's Utility MACT rule**, which is scheduled to be finalized on December 16, 2011.

As conservative pro-life Christians we are deeply concerned about efforts to roll back protections afforded to the unborn. In our commitment to protect unborn children from mercury and other hazardous pollutants we are also joined by the U.S. Conference of Catholic Bishops.² (Staff from USCCB will also join us in meeting with you.)

It is well past time for our unborn children to be protected by our government from mercury pollution. Currently **one in six babies born in the U.S. are threatened by harmful levels of mercury in their blood**. That means 700,000 precious children face potential brain damage, lower intelligence, or other severe neurological disorders.³ Yet, with your courageous leadership, we can significantly reduce the threat of mercury poisoning to the unborn.

Coal-fired utilities produce the largest domestic amounts of mercury. Once emitted, mercury falls from the air into our water sources, becomes part of the food chain, and is consumed by pregnant mothers when they eat contaminated fish. The dangers from mercury and heavy metals emitted from the burning of coal have long been known. Every state has issued fish advisories for pregnant women.

President George H. W. Bush signed the Clean Air Act in 1990, which made the protection of human life from air pollution a non-partisan issue. The 1990 act provided the procedures for the removal of toxins such as mercury. We have waited over 20 years; it's time that we let EPA do its job when it comes to mercury and the unborn.

In addition to protecting the unborn, the utility MACT rule will also have significant health benefits from the reduction of other pollutants, saving up to 17,000 lives, according to the EPA.

¹ For the full statement and related resources visit <http://mercuryandtheunborn.org>

² <http://www.usccb.org/about/general-counsel/rulemaking/upload/usccb-letter-to-lisa-jackson-2011.pdf>

³ 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>.

An Evangelical Call to Stop the Mercury Exposure of the Unborn

While it is clear that the Utility MACT rule will protect the unborn, those opposed make two basic counter-arguments focused on: (1) reliability, and (2) jobs.

The truth about reliability was stated in a recent report by the Congressional Research Service. They conclude there is ample reserve capacity to deal the effects of not only the Utility MACT rule, but also the other Clean Air Act regulations recently proposed or implemented.⁴

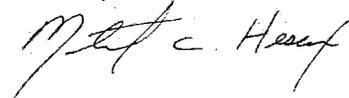
Concurring with this assessment is Michael Bradley, who represents a coalition of utilities. In a recent House Energy and Commerce Subcommittee hearing, he stated that “we do not believe compliance with the rule will compromise the reliability of the electric system.”⁵

As for jobs, a recently published report by the Economic Policy Institute (the labor movement’s premiere economic analysis organization) concludes that the mercury rule “would have a modest positive net impact on overall employment, likely leading to the creation of 28,000 to 158,000 jobs between now and 2015.”⁶ In addition, EPA found that the mercury rule would result in 31,000 short-term jobs and 9,000 permanent full-time jobs.⁷

In conclusion, the Utility MACT rule will protect the unborn, enhance human health, create jobs, and not threaten reliability.

Please know that we pray for your leadership, and we hope that you will help protect the unborn by not hindering the EPA’s Utility MACT rule from going into effect when finalized in December.

Sincerely,



The Rev. Mitchell C. Hescoc
President/C.E.O.

P.S. Please join us on November 30, 2011 for a briefing organized by the National Association of Evgnagelicals, the United States Conference of Catholic Bishops, and the Evangelical Environmental Network. The briefing will provide both the moral and public health support for not delaying the needed protection for our unborn children. Sen. Casey will also be a featured speaker.

⁴ Congressional Research Service, *EPA’s Regulation of Coal-fired Power: Is a ‘Train Wreck’ Coming?* (Aug 2011): pp. 30-35; 41.

⁵ U.S. House of Representatives Committee on Energy and Commerce Subcommittee on Energy and Power Hearing on “The American Energy Initiative” regarding Recent EPA Rulemakings Relating to Boilers, Cement Manufacturing Plants, and Utilities, April 15, 2011. For Bradley’s testimony, go to: http://republicans.energycommerce.house.gov/Media/file/Hearings/Energy/041511_2/Bradley.pdf.

⁶ Economic Policy Institute, *A Lifesaver, Not A Job Killer: EPA’s proposed “air toxic rule” is no threat to job growth*, Briefing Paper #312 (June 14, 2011): <http://w3.epi-data.org/temp2011/BriefingPaper312%20%282%29.pdf>.

⁷ EPA, *Power Plant Mercury and Air Toxics Standards: Overview of Proposed Rule and Impacts*, p. 2.

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.

ORGANIZATIONAL AND INDIVIDUAL SIGNATORIES

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Evangelical Environmental Network

The Rev. Dr. Leith Anderson
President
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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

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

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+Institution has endorsed the statement.

Signatories as of November 28 2011



Protecting the Unborn from Mercury

PROTECT LIFE

Christians are called to protect life, and for us that includes the unborn. Jesus taught us to love our neighbors and treat others as we would want to be treated. Protecting the unborn and children from mercury poisoning and air pollution, as the Environmental Protection Agency's (EPA's) Mercury Standard would do, is in keeping with Jesus' commands. Currently 1-out-of-6 babies are born with harmful levels of mercury in their blood. It is time to stop the mercury poisoning of the unborn.

LONG OVERDUE

The unborn were provided legal protection from toxic pollution like mercury in 1990. We've had two decades of bi-partisan foot-dragging, with the courts finally ordering the federal government to enforce the law and protect the unborn. Industry has known for over a decade that EPA was going to regulate them. It is well past time to stop gambling with the brains of unborn babies.

TREMENDOUS HEALTH BENEFITS AND JOB CREATION

Besides protecting the unborn from mercury poisoning, the air pollution reduced would help save up to 17,000 lives. Compliance with the Mercury Standard would also create over 30,000 jobs during construction and 9,000 permanent jobs related to operation and maintenance.

1 IN 6 UNBORN CHILDREN NOW THREATENED

Annually, 700,000 babies are born with harmful levels of mercury in their blood

As a pro-life, creation-care community, protecting and enhancing life is at the heart of what we do, and that's why we want to stop the mercury poisoning of the unborn. For the first time in the history of our country, the unborn will be protected from the damaging impacts of mercury pollution from power plants.



Fish warning in Valley Forge, PA; every state has issued fish advisories for pregnant women.

For over 20 years the unborn have lacked the protection rightfully theirs under the law from this pollution. At long last, after being ordered by the courts, on March 16, 2011 the EPA finally issued the necessary regulations or standards, which will be finalized in November.

However, the protectors themselves (i.e., the EPA) need support and protection from those in Congress and industry who feel protecting the unborn from such mercury pollution simply costs too much. The EPA's ability to protect the unborn and young children from mercury calls for a concerted campaign to protect, maintain, and even strengthen these standards.

What Mercury Does to the Unborn

Consumption of fish contaminated by mercury is the main route of human exposure. The mercury drops from the air into the water system, where fish we eat eventually take it up. Mercury is extremely toxic to the brain and nervous system, especially to the rapidly developing brain of the unborn child during early pregnancy. When a pregnant woman eats mercury-contaminated fish, the

**Creation Care.
It's a matter of
Life.**

www.CreationCare.org



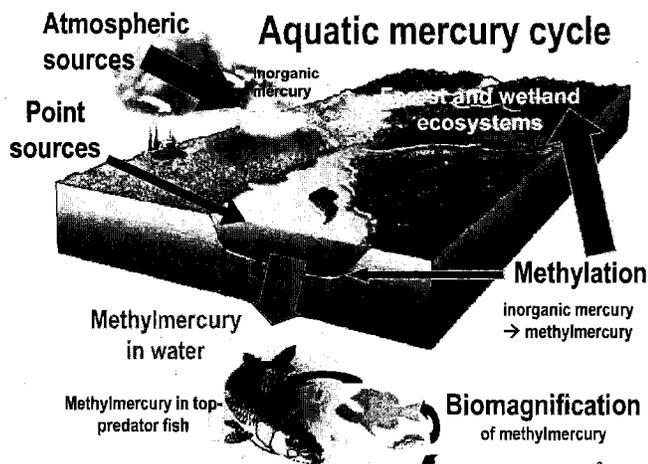
One in six babies are born with harmful levels of mercury in their blood,¹ and coal-burning power plants are the largest source of domestic mercury pollution.

mercury in the fish enters the mother's blood stream. Once in the mother's bloodstream, mercury can move directly across the placenta to enter the body of her unborn child. One of the body's protective shields against damage to the brain, called "the blood-brain barrier," is not fully developed until the first year of life. Thus, in the unborn child, mercury can cross this incomplete barrier and accumulate in the brain, causing developmental disabilities and brain damage resulting in:

- Lowered intelligence
- Learning problems

This has lifetime implications. One study found that "The resulting loss of intelligence causes diminished economic productivity that persists over the entire lifetime of these children."²

The unborn are also being harmed by air pollution (SO₂) that will be reduced as a co-benefit of the mercury standard. This pollution has been linked to birth defects, low birth weight, premature births, stillbirths and infant deaths.³



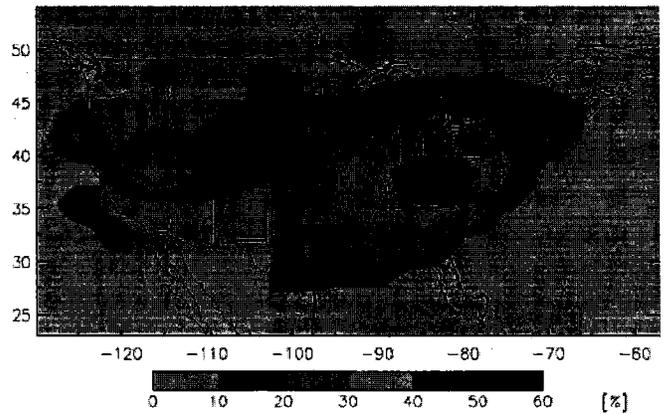
U.S. Geological Survey, National Survey of Mercury 2009²⁰

Where the Mercury Comes From

According to the National Academy of Sciences, "Mercury in the atmosphere comes as emissions resulting from human activities, from natural emissions, and 'legacy' sources—previously emitted mercury that continues to be recycled between the air, water and land surfaces, and is therefore present in the environment for long periods of time. Once emitted from any source, mercury can be transformed to different chemical forms, transported through the atmosphere, and deposited long distances from the point of origin."⁴

Domestic Sources

- Depending upon where you are, anywhere from 10 to 80% of mercury pollution is coming from domestic sources.
- Over 50% of domestic anthropogenic mercury emissions come from coal-burning power plants, making them the largest such source.⁵



Mercury deposited from domestic sources

The above map of the U.S. shows how domestic emissions are affecting the country, with the light purple areas representing less than 10% domestic, red at least 60%, etc.

International Sources

- For the U.S. population as a whole, most seafood is commercially purchased (as opposed to self-caught), and most of what is purchased are salt-water species, with tuna the largest share at 39%. About 67% of commercial tuna comes from the Pacific Ocean and 10% from the Atlantic.
- 50% of global emissions are from Asia.⁶

Conclusion: These facts mean that we cannot simply reduce domestic emissions. We must also work at the international level to get mercury emissions reduced. The first step, of course, is to practice what we preach and get our own house in order by implementing the EPA regulations without delay.

Pollution Reductions

- According to the EPA, the proposed mercury standard for power plants would reduce:
- 91% of the mercury
 - 55% of the sulfur dioxide (SO₂).⁷

How Protecting Human Health from Mercury Will Be Achieved

Some power plants around the country have already installed the pollution reduction technologies to protect the unborn and vulnerable, and those that need to do so can install them in the 3-year timeframe set by the EPA (with a 4th year for those who need extra time).

Those opposed are arguing once again that more time is needed and it will cost too much (even though the law was passed in 1990 and in 2000 the EPA announced that mercury would be regulated). But as a representative for many of the cleaner utilities put it: "On the whole, the industry can comply with the proposed [standard] in a timely and cost-effective manner."⁸ Another claim by the dirtier utilities is that compliance could disrupt reliability (i.e., possible black-outs). The cleaner utilities know that's not true: "we do not believe compliance with the [standard] will compromise the reliability of the electric system. The U.S. bulk power system, at an aggregate level, has adequate spare capacity..."⁹

"On the whole, industry can comply in a timely and cost-effective manner."

—Michael Bradley, Executive Director, Clean Energy Group; testifying before House Energy Subcommittee, April 15, 2011

Benefits of the Mercury Standard for Power Plants

1. Local Mercury Reductions

Reducing mercury pollution can have dramatic results in reducing mercury in fish that we eat. A study in Florida showed a 60% mercury decrease in fish after 10 years of strict regulations of local sources.¹⁰ A similar study in Massachusetts found a 70% reduction in mercury in the environment since the mid-1990s, and a 15-25% reduction in fish found in local streams and lakes.¹¹

2. Avoid Economic Losses from Brain Damage

Mercury pollution from power plants results in a yearly loss of around \$1.3 billion due to brain damage suffered in the womb.¹²

3. Health Co-Benefits From Cleaner Air

According to the EPA, in 2016, these proposed rules would avoid:

- 6,800 – 17,000 premature deaths,
- 850,000 days when people miss work,
- 120,000 cases of aggravated asthma, and
- 5.1 million days when people must restrict their activities.¹³

4. Clean Air Co-Benefits – In Dollars

The EPA's modeling projects that:

- We will get \$59 billion to \$140 billion in health benefits each year.
- For every \$1 spent, we get \$5-13 in health benefits.¹⁴

Jobs

The mercury standard and another clean air standard promulgated this year are projected to be major job creators. A recent report¹⁵ from the Political Economy Research Institute finds:

- Nearly 300,000 jobs will be created each year through 2015 due to implementation.
- There will be a net gain of over 4,000 permanent full-time jobs.

However, a few states will lose permanent jobs. For example: while Ohio gains 76,240 jobs from construction and its benefits, and adds 1,365 permanent jobs, it loses 1,772 permanent jobs for a total permanent job loss of 407 after 2015. Also, EPA's modeling of the mercury rule found that there would be far fewer short-term jobs (31,000 as opposed to nearly 300,000) but more permanent full-time jobs (9,000 compared to 4,000).¹⁶

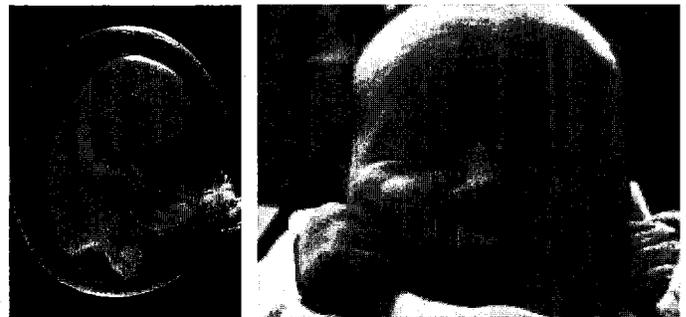
Costs for Consumers to Protect the Unborn from Mercury

- EPA projects an electricity price increase of \$3-4 for the average consumer, and a 1.3% increase in residential gas prices.¹⁶
- Some states who currently have lower rates, but also higher amounts of pollution and therefore will see higher utility price increases, are as follows:
 - Oklahoma and Kansas (7.1%)
 - Michigan, Indiana, Ohio, West Virginia, and Kentucky (5.5%)

- Minnesota, Iowa, North Dakota, South Dakota, & Nebraska (5.4%)
- Texas (5.3%).

Benefits Exceed Costs Significantly When Cleaning Our Air

- CAA regulations have been some of the most cost-effective regulations in history. A comprehensive review in 2003 by the George W. Bush Administration found that benefits exceeded costs by 12 times.¹⁷
- Benefits are projected to increase significantly in this decade. A Feb 2011 study from the EPA found that in 2020 benefits will exceed costs by 30 to 1.¹⁸
- In addition, the economy has grown significantly while we have cleaned up our air. Since 1990, GDP has grown 64% while the country has reduced air pollution by 41%.¹⁹



Pre-born child, month 4, and newborn.

"When Jesus saw this, he was indignant. He said to them, 'Let the little children come to me, and do not hinder them, for the kingdom of God belongs to such as these.'" (Mark 10:14 NIV)

Endnotes:

- ¹See Mahaffey et al., "Blood Organic Mercury and Dietary Mercury Intake" *Environmental Health Perspectives*, 112, #5 (April 2004).
- ²Trasande, 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.
- ³American Lung Association, *State of the Air* 2010.
- ⁴National Academy of Sciences, *Global Sources of Local Pollution*, Report in Brief (2009).
- ⁵EPA website, <http://www.epa.gov/mercury/about.htm>. Data from the 2005 National Emissions Inventory.
- ⁶See Selin, "Global Biogeochemical Cycling of Mercury: A Review," *Annual Review of Environmental Resources* (2009) Vol. 34 (2009): p. 48.
- ⁷EPA, *Power Plant Mercury and Air Toxics Standards: Overview of Proposed Rule and Impacts*, p. 2.
- ⁸Michael Bradley, Executive Director of the Clean Energy Group, a coalition of electric utilities, testifying before a House Energy & Power Subcommittee of the Energy & Commerce Committee on April 15, 2011.
- ⁹ibid.
- ¹⁰Florida DEP, *Integrating Atmospheric Mercury Deposition with Aquatic Cycling in South Florida*, Nov 2003.
- ¹¹Mark Smith, http://www.env.state.ma.us/eea/09-met-conf-presentations/met_event_sharon_weber.pdf.
- ¹²Trasande, et al., "Public Health and Economic Consequences of Methyl Mercury Toxicity to the Developing Brain."
- ¹³EPA Fact Sheet, *Proposed Mercury and Air Toxics Standards*, p. 3.
- ¹⁴EPA, *Power Plant Mercury and Air Toxics Standards: Overview of Proposed Rule and Impacts*, p. 2.
- ¹⁵Ceres/PERI, *NEW JOBS—CLEANER AIR: Employment Effects Under Planned Changes to the EPA's Air Pollution Rules* (April 2011).
- ¹⁶EPA, *Power Plant Mercury and Air Toxics Standards: Overview of Proposed Rule and Impacts*, p. 2.
- ¹⁷Bush Administration OMB, *Informing Regulatory Decisions: 2003 Report to Congress ...* (2003): 7-8.
- ¹⁸EPA, *The Benefits and Costs of the Clean Air Act from 1990 to 2020*, Summary Report, p. 2.
- ¹⁹EPA, *Our Nation's Air: Status and Trends Through 2008* (Feb 2010): p. 7.
- ²⁰USGS website, *National Survey of Mercury in Fish, Bed Sediment, and Water from Streams* 2009, <http://water.epa.gov/scitech/swguidance/fishshellfish/fishadvisories/upload/day1j.pdf>

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"For even I, the Son of Man, came
here not to be served but to
serve others, and to give my life
as a ransom for many."
(Mark 10:45 NLT)

Warning: A Mercury Fish Advisory Exists in Your State



Source: USEPA, 2008

ACTION IS LONG OVERDUE

"Wash and make yourselves clean. Take your evil deeds out of my sight; stop doing wrong. Learn to do right; seek justice. Defend the oppressed." (Isaiah 1:16,17a NIV)

To protect all unborn children from mercury we must significantly reduce the amount of mercury pollution we create as a society. The largest contributor is coal-burning power plants.

Public hearings on the EPA Mercury Rule are being convened. Contact your Members of Congress and the Obama Administration with the following message: mercury from air pollution must be strictly regulated to protect the unborn. If you are a Christian, let them know that this is important to you as a Christian.

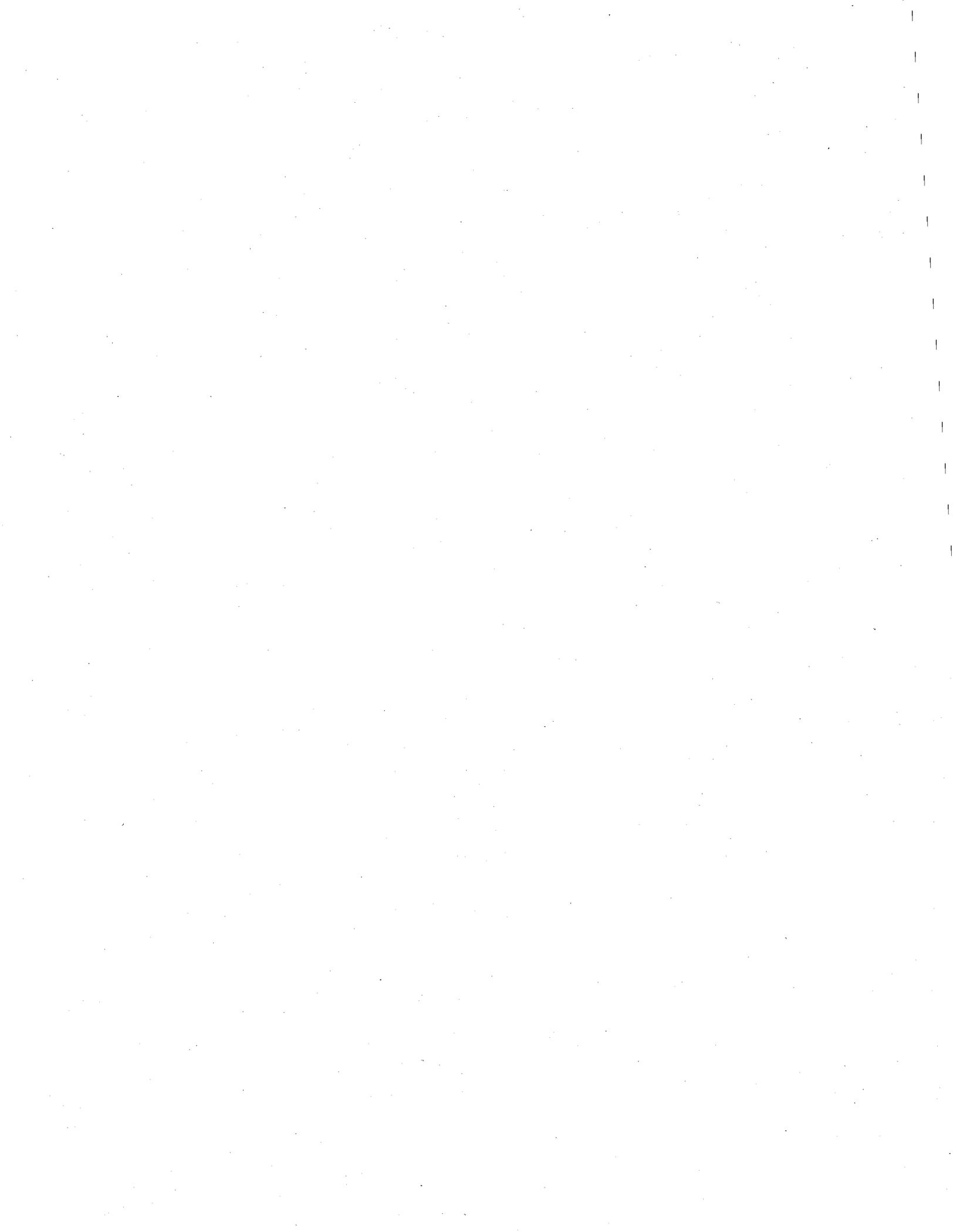
FOR MORE INFORMATION:

For references, articles, and a chart with commonly eaten fish and their mercury levels, see the advisory from the US Department of Health and Human Services, posted at www.creationcare.org/mercury.

Help Protect the Unborn from Mercury



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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 precious; they are a gift from God and the most vulnerable members of our society. Those gathered here today may come from different traditions in the Christian community, but together we believe not only is life precious but sacred. Anything that threatens and impedes life, especially impacts on the unborn and young children should be a moral outrage. Mercury poisoning is such an outrage.

We've waited since the 1990 Clean Air Act to clean up mercury. Because of our foot dragging approximately 1 in 6 children in the United States are born with threatening levels of mercury.ⁱⁱⁱ The mercury impairs neurological development, lowers IQ, linked to cardiovascular disease, and a host of other potential adverse health impacts.ⁱⁱⁱ These are lifetime effects. The economic loss attributed to reduced IQ from US coal fired power plants equals 1.6 billion per year in 2010 dollars.^{iv} When added to the co-public health benefits from particulates and acid rain reductions in the proposed Utility MACT Rule results in a potential \$140 billion savings per year in health costs returning \$5 to 13 dollar per \$1.00 spent on controls.^v

Public opinion continues to support regulations that protect children's health. Yet, Congress has largely ignored public concern and given a free pass to the largest domestic source of mercury pollution, coal fired electric utilities.^{vi} Coal electric generation produces 50% of the domestic mercury emissions; yet this sector is currently not required to meet the same emission standards as solid or medical waste incinerators. This is simply wrong

No amount of mercury is safe^{vii} and more enters the food chain each year. The USGS in its *Biannual*

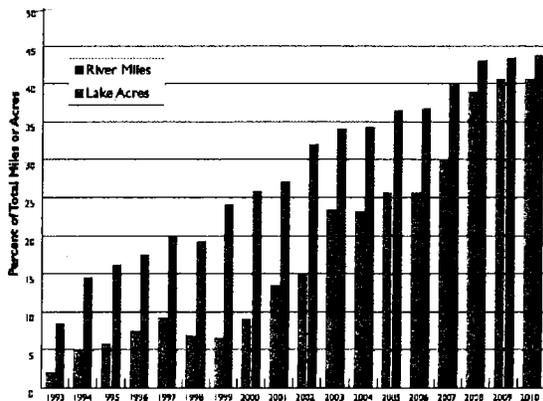


Figure 1 Lakes and Rivers with Fish Advisories

National Listing of Fish Advisories states that approximately 17 million acres of lakes and over 1.2 million miles of rivers have mercury advisories, an of 1.1% (lakes) and 0.2% (rivers) increase from 2008.^{viii}

Currently, the Evangelical Environmental Network is mounting a serious campaign strengthening public concern on mercury and its effects on the unborn. In six states ranging from the northeast, Midwest, and southeast over 10 million emails have been sent to pro-life voters and radio ads are running at saturation rates on over 60 Christian, Country and News/Talk

stations with billboards placed in strategic location in many states.

This campaign refutes the fears generated by some that allowing the EPA to perform its Congressional mandated mission will raise utility prices, cost jobs, and decrease electricity reliability.

Psalm 82:3 (ESV)

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

Our Holy Scriptures calls us to defend the weak, and the weakest, unborn children, pay the greatest cost in not reducing mercury emissions. Some will mistakenly cry out that the poor will be most affected in higher electric rates as the implementation costs will approach 10 billion dollars per year. Ten billion is a huge sum, but distributed per consumer in the United States results in an average maximum cost of \$7.00 per month per household. While the poorest might face impacts, the pollution reductions will return \$5 – 13 in health benefits for every \$1 spent on emission reduction as mentioned previously.^{ix}

Still others will claim massive jobs loss in jobs still faltering economy. These facts simply do not add up. EPA modeling provides a modest 31,000 construction jobs and net 9,000 new permanent positions.^x Nor does it match the conclusion from the Economic Policy Institute, the labor movement’s premiere analytical shop. It states: “The toxics rule would have a modest positive net impact on overall employment, likely leading to the creation of 28,000 to 158,000 jobs between now and 2015.”^{xi}

Perhaps the greatest current fear tactic centers on electricity reliability. But utility representatives themselves debunk this. In testimony at EPA’s public hearing in Philadelphia, Exelon’s Bruce Alexander stated that “nothing about this rule [the mercury regulation] will jeopardize the reliability of the electric system.”^{xii} Testifying before a House Energy and Commerce Subcommittee hearing, Michael Bradley, representing a coalition of utilities, stated that “we do not believe compliance with the rule will compromise the reliability of the electric system.”^{xiii} The Bipartisan Policy Centers rebuts reliability question in stating, “While an emergency reliability issue is unlikely and should be preventable with proper planning and oversight, DOE and FERC have authority to address such situations if they arise.”^{xiv} The November 2011 Clean Energy Group report affirms, “... the electric industry can comply with EPA’s air pollution rules without threatening electric system reliability.”^{xv} Even this week’s NERC report that bases its conclusions on more stringent rules than EPA proposes, assumes no new generation capacity, and attributes all plant closing do to EPA regulations states that there are risks but they can be manageable with proper planning and coordination.^{xvi}



One of the greatest joys in my life is being a “pop-pop.” Jack is my seven-month old grandson and like me lives in Pennsylvania. Pennsylvania, one of the largest mercury emitters, has no state regulations as several years ago the Commonwealth’s Supreme Court struck down the state laws as the responsibility of the Federal Government and EPA. One of our greatest prayers is that Jack has not suffered IQ loss or other developmental disability. We pray because many of mercury conditions are not diagnosable for 24 to 48 months post-natal, well after the damage. We stand a good chance because of my involvement and on the advice of her physician, my daughter

ate very little fish during her pregnancy. How many will not be as unfortunate, one out of six. That's simply unacceptable to God and it should be to Congress as well.

Next week, I understand the House Energy and Commerce Committee are marking up more legislation to stop the EPA. I pray the Senate is wise enough to put our unborn children first and stop this terrible threat upon our children.

The bottom line is children are God's most precious gift. We have a known hazard that impacts each unborn child's life from conception to death, and we must do all we can as a government and as a society to offer our children an opportunity for an abundant life. To do anything else is simply immoral.

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

ⁱⁱ 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

ⁱⁱⁱ <http://www.epa.gov/ttn/ecas/regdata/RIAs/ToxicsRuleRIA.pdf>

^{iv} 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

^v EPA, *Power Plant Mercury and Air Toxics Standards: Overview of Proposed Rule and Impacts*

^{vi} <http://www.lawandenvironment.com/uploads/file/CRS-EPA.pdf>

^{vii} Bose-O'Reilly, et. al., *Mercury Exposure and Children's Health*, *Curr. Probl. Pediatr Health Care*, 2010 September: 40(8): 16-18.

^{viii} <http://water.epa.gov/scitech/swguidance/fishshellfish/fishadvisories>

^{ix} EPA, *Power Plant Mercury and Air Toxics Standards: Overview of Proposed Rule and Impacts*, p. 2.

^x EPA, *Power Plant Mercury and Air Toxics Standards: Overview of Proposed Rule and Impacts*

^{xi} Economic Policy Institute, *A Lifesaver, Not A Job Killer: EPA's proposed "air toxic rule" is no threat to job growth*, Briefing Paper #312 (June 14, 2011): <http://w3.epi-data.org/temp2011/BriefingPaper312%20%282%29.pdf>.

^{xii} http://www.exeloncorp.com/assets/newsroom/speeches/docs/speech_Alexander_PhilEPAHearing_110524.pdf

^{xiii} U.S. House of Representatives Committee on Energy and Commerce Subcommittee on Energy and Power Hearing on "The American Energy Initiative" regarding Recent EPA Rulemakings Relating to Boilers, Cement Manufacturing Plants, and Utilities, April 15, 2011. For Bradley's testimony, go to:

http://republicans.energycommerce.house.gov/Media/file/Hearings/Energy/041511_2/Bradley.pdf.

^{xiv} Bi-Partisan Policy Center, *Environmental Regulation and Electric System Reliability*, June 2011:

http://www.eenews.net/assets/2011/06/13/document_pm_02.pdf.

^{xv} http://www.mjbradley.com/sites/default/files/ReliabilityUpdateNovember202011_1.pdf

^{xvi} http://www.nerc.com/files/2011LTRA_Final.pdf