

Statement of Ricardo Simmonds
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U.S. Consumer Product Safety Commission
Organohalogen Flame Retardants Petition; Oral Presentation [Docket No. CPSC–2015–
0022]
Submitted by email: cpsc-os@cpsc.rog
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RE: Petition for Rulemaking to Protect Consumers and Children from Toxic Flame Retardant Chemicals in Four Categories of Household Products

My name is Ricardo Simmonds and I present before you today on behalf of the United States Conference of Catholic Bishops (“Conference”) to comment on the petition to ban organohalogen flame retardants from consumer products.

The United States Conference of Catholic Bishops is an “assembly of the hierarchy of the United States and the U.S. Virgin Islands who jointly exercise certain pastoral functions on behalf of the Christian faithful of the United States.” There are 17 Cardinals and 446 active and retired Bishops in the United States, representing over 70 million Americans in almost 200 dioceses across the country. The bishops speak, not as technical experts, but as people of faith, who offer a moral perspective rooted in a rich faith tradition 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.

Two years ago, Pope Francis published an encyclical on the environment that proposed an “integral ecology” whereby “everything is interconnected”: the fate and health of the environment is deeply intertwined with human, social and economic health. The Pope asked the question, which we can ask ourselves now: “What kind of world do we want to leave to those who come after us, to children who are now growing up?” (*Laudato Si’* no. 60)

Children, inside and outside the womb, are uniquely vulnerable to environmental hazards and exposure to toxic pollutants in the environment. Their bodies and behaviors leave them more at risk than adults to such health hazards. Because children are exposed to environmental hazards at an early age, they are susceptible to developing slowly-progressing environmentally triggered illnesses such as asthma, certain cancers, learning disabilities and other conditions that adversely affect childhood development. In short, exposure to toxic chemicals is significantly more harmful to children, born and unborn.

In an effort to develop the leadership of Catholic organizations and networks to help address environmental hazards affecting children’s health, a coalition of major Catholic organizations

formed the Catholic Coalition for Children and a Safe Environment (CASE). In 2007, CASE members hosted a major conference on the effects of environmental toxins on unborn children, "Protecting Human Life and Caring for Creation," held at the United States Conference of Catholic Bishops (USCCB). This unprecedented event brought together prominent leaders from the Catholic community, government, and the public health sector to learn more about how unborn children are exposed to environmental harm, how this exposure affects them later in life, and what can be done to better protect them. Building on this collaboration, in July 2008 the "Life, Justice & Family" convocation included a session on "Toxins, the Environment and the Child in the Womb."

To learn and disseminate information about environmental threats that may affect children's health, the Conference monitors information about the effect of environmental threats on children's health and identifies opportunities to strengthen policies that protect children, born and unborn, from exposure to harmful toxins and chemicals.

Organohalogen flame retardant chemicals present a real health concern. Among many things, this class of chemicals has been associated with serious human health problems, including cancer, increased time to pregnancy, decreased IQ in children, impaired memory, learning deficits, hyperactivity, hormone disruption and lowered immunity.

As people of faith, we are called to care for God's gift of creation and to protect the most vulnerable among us. Caught in a spiral of poverty and environmental degradation, the poor and the powerless are disproportionately impacted by the effects of exposure to environmental problems, as their lands and neighborhoods are more likely to be polluted, to be near toxic waste dumps, or to suffer from water contamination. Pope Francis reminds us that, "each year hundreds of millions of tons of waste are generated, much of it non-biodegradable, highly toxic and radioactive, from homes and businesses, from construction and demolition sites, from clinical, electronic and industrial sources. The earth, our home, is beginning to look more and more like an immense pile of filth." (LS no. 21)

Commissioners, you have the unique opportunity to address this injustice and a duty to protect our children and our families. The Conference urges the CPSC to ban these toxic and pervasive chemicals from children's products, furniture, mattresses and the casings around electronics. Doing so would help to protect the health and welfare of all people, especially most vulnerable members of our society, including the unborn and young children, from harmful exposure to these toxic chemicals. 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. We seek to bring new hope and concrete help to a generation of children at risk."