



January 25, 2018

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

RE: Docket #EPA-HQ-OPPT-2017-0586

Dear Administrator Pruitt,

The March of Dimes, a unique collaboration of scientists, clinicians, parents, members of the business community and other volunteers in every state, the District of Columbia and Puerto Rico, appreciates the opportunity to comment on the EPA's Final Rule for Procedures for Prioritization of Chemicals for Risk Evaluation, as established by the Frank R. Lautenberg Chemical Safety for the 21st Century Act.

The March of Dimes appreciates that the Final Rule specifically includes infants and pregnant women in the definition of potentially exposed and susceptible subpopulations, as required by law. Studies have shown that dozens or hundreds of chemicals can be found in the tissues of individuals of all ages, including the pregnant woman, fetus and newborn. Analysis of National Health and Nutrition Examination Survey data demonstrated that virtually every pregnant woman in the United States is exposed to at least 43 different chemicals.ⁱ Scientific research has demonstrated that prenatal exposure to certain chemicals is linked to various adverse birth outcomes and other health consequences.ⁱⁱ

Additionally, children face a greater threat from toxic chemicals because of their immature and growing systems, which may be less efficient at detoxifying and eliminating harmful substances; because they have longer life expectancies (allowing more time for bioaccumulation and associated damage); and because they face proportionately higher exposure to certain chemicals and related substances.ⁱⁱⁱ Children's smaller sizes mean that they have a greater surface area to body mass ratio, so topical exposure can have an outsized effect. They eat and drink more food and water per unit of body weight than adults do. Adjusted for body weight, young children breathe more air than adults. Given these increased vulnerabilities, pregnant women and children must be given an additional margin of protection beyond other populations.

For these reasons, the March of Dimes believe it is imperative that EPA consider the unique implications for maternal and child health when prioritizing review of chemicals for risk evaluation. Not only does the law require this, but our nation's women, children and families deserve no less.



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Again, thank you for the opportunity to provide comments. For more information, please contact Jaimie Vickery, Director of Federal Affairs for the March of Dimes at 202-659-1800 or jvickery@marchofdimes.org.

Sincerely,

A handwritten signature in blue ink that reads 'Paul E. Jarris, MD'.

Paul E. Jarris, MD, MBA

Chief Medical Officer

Senior Vice President Mission Impact

ⁱ Woodruff T, Zota A, Schwartz J. Environmental chemicals in pregnant women in the United States: NHANES 2003-2004. *Environ Health Perspect*. 2011;119(6).

ⁱⁱ American College of Obstetricians and Gynecologists Committee on Health Care for Underserved Women and American Society for Reproductive Medicine Practice Committee. Exposure to Toxic Environmental Agents. Committee Opinion No. 575, October 2013.

ⁱⁱⁱ American Academy of Pediatrics. Policy Statement – Chemical Management Policy: Prioritizing Children’s Health. *Pediatrics*. 2011;127(5).