

Andrew Wheeler, Acting Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Acting Administrator Wheeler,

For many years we have worked to protect pregnant mothers and the unborn against exposure to mercury. In 2012 we supported the Environmental Protection Agency's Mercury Rule. Now the EPA is planning on overturning the regulation. We urge you to reconsider this action.

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) The psalmist wrote, "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.

One of the major laws passed to combat environmental degradation and protect human health is the Clean Air Act, 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.

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.

Opponents of restrictions on mercury pollution argue that the cost of cleaning up our air is too high. 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 continue to support efforts to safeguard pregnant mothers and our unborn and newborn children from the neurological health risks associated with mercury poisoning.

In proposing to roll back the 2012 mercury regulation, the administration wants to exclude co-benefits and ancillary benefits from any cost-benefit analysis. This contradicts [guidelines](#) to federal agencies issued by the George W. Bush administration in 2003, which states: "Your analysis should look beyond the direct benefits and direct costs of your rulemaking and consider

any important ancillary benefits and countervailing risks.” In the case of the mercury regulation, such co-benefits included the health benefits associated with reducing soot and smog.¹

When looking at the costs and benefits to society of a regulation, it makes little sense to ignore certain benefits because of how they are labeled. From society’s perspective, from the perspective of human health, they’re just benefits.

We respectfully ask the Trump Administration to reconsider and reverse the decision to allow additional mercury pollution in our air and water.

Sincerely,

Leith Anderson
President
National Association of Evangelicals

Mitchell C. Hescox
President/C.E.O.
The Evangelical Environmental Network

¹ At the time the mercury regulation was put into effect in 2012, the co-benefits from reducing soot and smog were estimated to be between \$37 billion and \$90 billion per year. Add to that the \$6 billion in benefits from the mercury reductions, and benefits far exceed the estimated \$9.6 billion in costs. But if the co-benefits are not counted, then costs outweigh benefits by approximately \$3.6 billion.