



American Academy  
of Pediatrics



DEDICATED TO THE HEALTH OF ALL CHILDREN™



February 12, 2014

The Honorable Fred Upton  
Chair, Energy and Commerce Committee  
U.S. House of Representatives  
Washington, DC 20510

The Honorable Henry Waxman  
Ranking Member, Energy and Commerce Committee  
U.S. House of Representatives  
Washington, DC 20510

The Honorable John Shimkus  
Chair, Environment and the Economy  
Subcommittee  
U.S. House of Representatives  
Washington, DC 20510

The Honorable Paul Tonko  
Ranking Member, Environment and the Economy  
Subcommittee  
U.S. House of Representatives  
Washington, DC 20510

Dear Chairman Shimkus and Ranking Member Tonko,

The American Congress of Obstetricians and Gynecologists (ACOG), the American Society for Reproductive Medicine (ASRM), the American Academy of Pediatrics (AAP), and the Society for Maternal-Fetal Medicine (SMFM) thank you for your leadership in elevating the issue of toxic chemical reform. Together our organizations represent nearly 120,000 physicians and partners dedicated to the health of vulnerable populations such as pregnant women, infants, and children. We appreciate your commitment to enacting meaningful chemical safety legislation.

We are taking this opportunity to provide you with our comments on reform of the Toxic Substances Control Act (TSCA).

As practitioners of women's and children's health, we are consistently seeking ways to advance the health of our patients and to improve outcomes. We know that an important outcome of pregnancy is no longer just a healthy newborn, but a human being optimally programmed for health from infancy through old age. Pregnant women's exposure to harmful chemicals can cross the placenta, and in some cases can accumulate in the fetus, resulting in higher fetal than maternal exposure. Robust scientific evidence has emerged over the past several years demonstrating that preconception and prenatal environmental exposures can have a profound and lasting impact on reproductive health across the life course. In addition, as infants and children grow and mature, their unique physiologic, developmental and behavioral differences make them especially vulnerable to chemical exposures during critical windows of development. It is with these concerns in mind that we share our recommendations to reform TSCA.

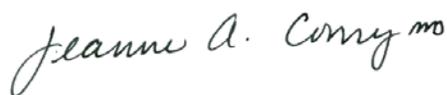
Any reform proposal should include:

- An adequate definition of "vulnerable populations," as is found in the definition of "vulnerable human population" in the Safe Chemicals Act (S 696) including, at minimum, pregnant women, infants, and children;
- A requirement that subpopulations, once defined, are protected from aggregate exposure to high priority chemicals;
- A health-based standard of "a reasonable certainty of no harm to vulnerable populations;"

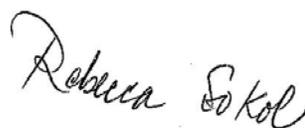
- A requirement of the EPA and industry to estimate the cost of dealing with the health care consequences, including neurodevelopmental and immunological damage, of chemical exposures;
- Initiation of a public awareness and prevention campaign, to address the enormous public health implications of these exposures;
- Support of additional scientific investigation into the causes and prevention of birth defects, including linkages between environmental hazards and adverse reproductive and developmental outcomes; and
- Establishment of appropriate deadlines and timetables for EPA to complete a minimum number of safety assessments and determinations. The history of environmental laws is that they achieve their best results with clear and definite deadlines.

Congress has an opportunity to enact truly meaningful preventative and protective chemical safety legislation. We hope that careful consideration will be given to our recommendations, and that the health of vulnerable populations will be a main focus of reform. We look forward to working with you to bring the best TSCA-reform proposal forward and hope that you will see us as a resource moving forward.

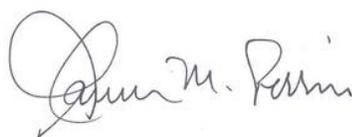
Sincerely,



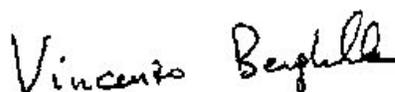
Jeanne A. Conry, MD, PhD, FACOG  
President  
American Congress of Obstetricians and  
Gynecologists



Rebecca Z. Sokol, MD, MPH  
Acting President  
American Society for Reproductive Medicine



James M. Perrin, MD, FAAP  
President  
American Academy of Pediatrics



Vincenzo Berghella, MD  
President  
Society for Maternal-Fetal Medicine

Cc: Honorable John Barrow  
Honorable Joe Barton  
Honorable Gus Bilirakis  
Honorable Lois Capps  
Honorable Bill Cassidy  
Honorable Diana DeGette  
Honorable John Dingell  
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