

**Testimony of Barbara Gottlieb,
Physicians for Social Responsibility,
to the U.S. Environmental Protection Agency
on the Mercury and Air Toxics Standards, MATS, and the
“Appropriate and Necessary” Determination**

Good afternoon and thank you for this opportunity to testify. My name is Barbara Gottlieb, spell. I am the director of Environment & Health at Physicians for Social Responsibility, or PSR. We are a national physician-led nonprofit, recipient of the 1985 Nobel Peace Prize, with members and chapters across the country. We educate and advocate to protect us all from the gravest threats to health and survival, including climate change, fossil fuels and toxics.

PSR strongly supports the EPA in your proposal to reaffirm the determination that it is “appropriate and necessary” to regulate hazardous air pollutants, including mercury, from coal-fired and oil-fired power plants under Clean Air Act section 112.

I’m focusing today on mercury and its health effects. Given the well-documented impacts of mercury on the developing brain, there can be no doubt that this regulation is necessary. Mercury is a neurotoxic, dangerous in very small doses. After it is emitted into the air by a power plant, mercury falls to earth with the rain and other precipitation, enters surface water, is absorbed by wildlife, and moves up the food chain from worms and snails to fish. It becomes more concentrated as it goes, eventually increasing the risk to people who eat contaminated fish. Fish can provide a healthful food source rich in protein, vitamins and minerals, and nutrients in fish support, among other things, brain development. But when fish are mercury-contaminated, they convey harm, not development, to the brain and nervous system.

Families in many communities of color, including African Americans and Indigenous peoples, rely on fishing to meet their basic nutritional needs, making them far more vulnerable to harm from contaminated fish than are the general population. Compounding this risk is the fact that communities of color and low-wealth communities frequently have limited access to health care, allowing adverse impacts to go unaddressed. In short, we end up with an Environmental Justice situation.

Most at risk are the unborn, who absorb mercury from their mothers’ bodies while in utero. They can experience profound and permanent developmental and neurological delays because of their mothers’ elevated blood-mercury levels, and they may suffer significant, permanent and irreversible loss of IQ. Think about that. That is a terrible price to pay for trying to feed your child nutritious food – and it is unnecessary. Or if I may put it in another way, it **is** necessary for EPA to take steps that will prevent this contamination and the resulting damage to babies and their human potential.

Is it appropriate for EPA to take regulatory actions designed to reduce those effects?

Unquestionably. I say that because EPA has taken such action in the past, to great effect. Prior to MATS, power plants were the largest domestic source of mercury and of several other air toxic pollutants. MATS, along with changes in the power sector, achieved significant drops in mercury

emissions and Hazardous Air Pollutants. We urge you to conduct and strengthen these standards. Taking such effective action is entirely appropriate, given the EPA's very reason for existence: to protect human health and the environment. In fact I can hardly think of a more mission-appropriate action for EPA to take.

To sum up, Physicians for Social Responsibility welcomes your proposal to require oil- and coal-fueled power plants to control their emissions of hazardous air pollutants, including mercury. We are very happy to see you taking action to protect all of us, every day. To you as to the MATS Appropriate and Necessary determination, I say: We're glad you're back!