

Representatives: Strengthen the lead reduction requirements in HR 4040

Advocates for Environmental Human Rights
Alaska Community Action on Toxics
American Association on Intellectual and Developmental Disabilities (Formerly AAMR)
American Nurses Association-Maine
The Annie Appleseed Project
Armor Bearer Inc.
Blue Ridge Environmental Defense League
Breast Cancer Fund
Buckeye Environmental Network
Californians Against Waste
Campaign for America's Future
Center for Health, Environment and Justice
Childproofing Our Communities Campaign
Children's Environmental Health Network
Citizens' Environmental Coalition
Citizens for Environmental Justice
Citizens Leading for Environmental Action and Responsibility
Clean Air Clear Lake
Clean New York, A Project of Women's Voices for the Earth
Clean Water Action
Clean Water Action Alliance of Massachusetts
Community Environmental Monitoring
Connecticut Coalition for Environmental Justice
Deep South Center for Environmental Justice
EAGLE
Earth Resource Foundation
Ecology Center
Empire State Consumer Project
Environment America
Environment California
Environmental Defense
Environmental Health Fund
Environmental Working Group
Fluoride Action Network
For a Better Bronx
Friends and Advocates for Children, Teachers and Schools
Global Alliance for Incinerator Alternatives
Global Community Monitor
Glynn Environmental Coalition
Great Neck Breast Cancer Coalition
Green Party of Oklahoma
Greenpeace
Health Care Without Harm-Boston
Healthy Building Network
Healthy Children Organizing Project
Healthy Schools Network, Inc.
Institute for Agriculture and Trade Policy
Institute for Local Self-Reliance
INND (Institute of Neurotoxicology & Neurological Disorders)
International Labor Rights Forum

Kentucky Environmental Foundation
Lead Poisoning Prevention Program, Environmental Quality Institute, UNC-Asheville
Learning Disabilities Association of America
Michigan Clean Water Action
Mid Coast Hospital
MOMS (Making Our Milk Safe)
The National Association for the Dually Diagnosed.
National Environmental Trust
New York State Advisory Council on Children's Environmental Health and Safety
New York State Nurses Association
Next Generation Choices Foundation/LESSCANCER.ORG
Oregon Center for Environmental Health
Oregon Physicians for Social Responsibility
Oregon Toxics Alliance
Parents for Nontoxic Alternatives
Public Citizen
Project for Environmental Health, Knowledge, & Action
Raging Grannies Action League
Rochesterians Against the Misuse of Pesticides
Science and Environmental Health Network
Sierra Club
Students & Scholars against Corporate Misbehavior
United Neighbors Concerned About General Electric & Dewey Loeffel Landfill
U.S. Public Interest Research Group
Wal-Mart Watch

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Dear Representative,

We the undersigned organizations concerned about the acute and chronic hazards posed to children and others by lead and other heavy metal and chemical hazards, write to urge your support for strengthening the lead reduction requirements in House bill 4040, the Consumer Product Safety Act (Dingell-Barton-Rush-Stearns) under consideration in the Energy and Commerce Committee.

We commend the authors for drafting the lead provision, as an effort to establish a bright line safety standard to limit lead to trace levels in paint, children's jewelry and other children's products, rather than requiring "accessibility" or exposure testing to determine whether a product should be banned. However, we strongly urge you to strengthen the proposed lead provision, which while it lowers allowable lead levels, could be improved.

As proposed by the American Academy of Pediatrics, allowable lead levels should be lowered to the lowest level possible for all children's products, or 40 ppm. We therefore recommend that Congress establish a maximum lead level of 40 ppm in all children's products with the goal of achieving 0 ppm. This level, while not zero, more accurately reflects background levels and the science on the devastating impacts of lead exposure to children. It will also be easier to enforce a single science-based standard than multiple politically derived levels.

Legislation has been passed in 19 U.S. states restricting lead and three other heavy metals in packaging at levels stricter than what is being proposed for products that children play with and place in their mouths. These existing laws state that no intentional introduction of any amount of the four metals is allowed. The sum of the concentration levels of incidentally introduced lead, mercury, cadmium, and hexavalent chromium present in any package or packaging component shall not exceed 100ppm a few years after enactment (most of the state laws were passed in the early-mid 1990's).

We support the American Academy of Pediatrics recommendation that a children's product be defined as one used by or with children under the age of 12 years in order to provide a standard that protects the most children possible throughout periods of rapid brain development.

Our organizations support steps to reduce exposure to toxicants in our environment that are known carcinogens, endocrine disruptors, or that can cause long-term developmental disorders. Our concerns include heavy metals and, for some organizations, emerging chemicals of concern such as phthalates and brominated fire retardants. Strengthening the bill's ban on lead except in trace levels is a very good start on this effort because lead has no business in any children's products. It can reduce intelligence and cause numerous other serious health problems. We would be happy to work with the committee on additional steps to eliminate preventable toxic chemical exposures to children and other consumers.

Thank you for your efforts to strengthen surveillance of toxic imports, to enhance the CPSC's ability to enforce product safety laws and to eliminate avoidable lead in consumer products. Also please oppose any weakening amendments to this legislation intended to protect children and other consumers from toxic and other product hazards.

Sincerely,

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