

March 13, 2014

The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator McCarthy:

The undersigned organizations are concerned about recent EPA decisions that undermine the Design for the Environment (DfE) program, a valuable EPA program and, more importantly, may harm children's health.

We recognize your commitment to protecting human health and the environment. We were glad to learn of your recent re-affirmation of EPA's October 1995 policy directive that requires the Environmental Protection Agency (EPA) to consistently and explicitly evaluate environmental risks of infants and children in all risk assessments, risk characterizations, and in setting environmental and public health standards.

As you know, asthma is a concern for both children and adults in the U.S. Asthma prevalence has increased substantially over the past 30 years, and today more than 10% of school age children in the U.S. have asthma.

Indoor air quality is also a concern for everyone, not just those with asthma and existing respiratory issues, and especially for vulnerable populations such as children. The Agency states that, "for many people, the risks to health may be greater due to exposure to air pollution indoors than outdoors" because "the air within homes and other buildings can be more seriously polluted than the outdoor air in even the largest and most industrialized cities."

Scented chemicals increase risk that some per cent of exposed people will have allergic and hypersensitivity reactions. Allergic and asthmatic children are at especially high risk. That's why it is standard environmental health practice to discourage the use of air fresheners, scented products, and fragrances in homes and other indoor spaces.

We were surprised and deeply disappointed to learn that the Agency's Design for the Environment program (DfE) created a "fragrance" category of chemicals for commercial and consumer cleaning products. The vast majority of chemicals listed -- 93 of the 119 total -- have "hazard profile issues" because they are identified in one of these three categories:

- "Known sensitizer";
- "Lacks sufficient sensitization data"; or a
- "Repeat-dose toxicant."

According to DfE, "Each ingredient in a formulation has a function in making a product work." However, fragrances play no role in the effectiveness of cleaning products. Such artificial

suppression of other odors may even mask the continuation of an unsanitary condition after cleaning.

In general, children and adults should be protected from unnecessary exposure to chemicals that may impact their health or development. The EPA should thus be promoting practices that decrease exposure to asthmagens, substances that may serve as sensitizers, and any chemical that may contribute to poor indoor air quality.

The Design for the Environment program has many merits. We commend the Agency, the involved industries and businesses, and the other stakeholder groups who have worked to promote safer chemicals and increase transparency.

Unfortunately, these recent decisions on fragrances undermine the program. Worse, it gives false assurances to consumers that products approved by the DfE program do not contain unnecessary volatile chemicals that could harm health.

As a result, organizations and professionals who had previously encouraged the use DfE products will no longer be comfortable promoting the program.

We strongly urge:

- Reversal of the DfE decision to consider fragrances as “necessary” in consumer products and elimination of this category;
- Routine consultation by the DfE program with the Office of Children’s Health Protection (OCHP) to best assure that children’s unique vulnerabilities and exposures are considered in all DfE activities and that DfE provide adequate resources to OCHP to support this work; and
- Affirmation that the Agency’s policy directive on children’s environmental health is being applied to all Agency activities, including DfE; and if this is not the case, that the directive be immediately expanded to do so.

Our children deserve no less.

We look forward to hearing from you. Thank you.

Sincerely,

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