



8515 GEORGIA AVENUE, SUITE 400
SILVER SPRING, MARYLAND 20910-3492
301 628-5000 • FAX 301 628-5001
www.NursingWorld.org

REBECCA M. PATTON, MSN, RN, CNOR
PRESIDENT

MARLA J. WESTON, PhD, RN
CHIEF EXECUTIVE OFFICER

May 24, 2010

Ms. Nancy Sutley
Chair
The Council on Environmental Quality
Attention: Ted Boling
722 Jackson Place, NW
Washington, DC 20503

Submitted electronically to GCC.guidance@ceq.eop.gov

Re: Comments on the NEPA Draft Guidance, "Consideration of the Effects of Climate Change and Greenhouse Gas Emissions," 75 Fed. Reg. 8046 (Feb. 23, 2010)

Dear Chairman Sutley:

The American Nurses Association (ANA) welcomes the opportunity to offer comments on the NEPA Draft Guidance, "Consideration of the Effects of Climate Change and Greenhouse Gas Emissions."

The ANA is the only full-service professional organization representing the interests of the nation's 3.1 million registered nurses, the single largest group of health care professionals in the United States. We represent RNs in all roles and practice settings, through our state and constituent member nurses associations, and organizational affiliates. ANA is actively involved in forming public policy that affects human health and patient advocacy, and has long recognized that a clean, safe environment is a fundamental requirement for ensuring and maintaining the health of our patients, our families, and our community.

ANA Strongly Supports Efforts to Address Global Climate Change. In 2003, ANA endorsed the "precautionary approach" when it adopted the principle that "when an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationship are not fully established scientifically."¹ In 2007, ANA published its "Principles of Environmental Health for Nursing Practice with Implementation Strategies," which recognized that

¹ Science and Environmental Health Network, Wingspread Conference on the Precautionary Principle January 26, 1998 <http://www.sehn.org/wing.html>, accessed 5/20/10.

global climate change is “[a]mong the most critical environmental issues of concern for the nation and the world.”² In 2008, the ANA House of Delegates recognized nurses’ “obligation to take action to influence public policy on global climate health threats” by adopting a resolution on Global Climate Change. That resolution supported a precautionary mandating action to counteract potential threats to human health, and recognized that “current scientific evidence research . . . clearly documents the threats posed by global climate change on a massive human and environmental scale.”

The Draft Guidance Is An Important Step in Addressing Climate Change. We commend the Council on Environmental Quality (CEQ) for taking the initiative to ensure that federal agencies carefully consider the effects of climate change and greenhouse gas emissions, by making this explicit in the Draft Guidance. In particular, we support the following principles of the Guidance:

- Federal agencies should be required to consider the cumulative effects of their actions in the long-term, and in the aggregate. Serious harm can be done to the environment through the accumulation of effects from day-to-day and seemingly minor or inconsequential actions.
- We agree that “scientific and professional integrity” is a crucial component of agencies’ assessments.
- We strongly support the identification and adoption of “best practices” in preventing greenhouse gas emissions and climate change.
- We commend CEQ for advising agencies to “consider the particular impacts of climate change on vulnerable communities” such as tribal and Alaska Native communities. We believe this should be mandatory rather than advisory. We also urge taking into account the concept of “environmental justice,” whereby vulnerable populations are disproportionately affected by environmental hazards because their lack of resources restricts their choices or ability to move to a different community.

Additional Items For Consideration. We would also like to offer the following suggestions for CEQ to take into consideration, in the final version of the guidance:

- The guidance should also apply to Federal land and resource management actions. The Federal government is the steward of the land and resources, and its land and resource holdings are vast and abundant. The Federal government should be the leader in this effort, and set the example for the entire country. It should not be exempt from its own requirements.
- Agencies should review and consider the secondary and indirect effects of their actions which can in turn contribute to climate change and greenhouse gas emissions. CEQ could provide examples in detail in the final guidance, including whether actions require additional:
 - Transportation

² ANA’s Principles of Environmental Health for Nursing Practice with Implementation Strategies (9), American Nurses Association, Silver Spring, MD, 2007.

- Waste generation and disposal
- Energy use
- Water use

Conclusion

The American Nurses Association appreciates this opportunity to comment on this important issue. If we can be of further assistance, or if you have any questions or comments, please feel free to contact Holly Carpenter, BSN, RN, Senior Staff Specialist, Center for Occupational and Environmental Health, at holly.carpenter@ana.org, 301-628-5105.

Sincerely,

Marla J. Weston, PhD, RN
Chief Executive Officer
American Nurses Association