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July 28, 2010

Vivian Daub
Director, Planning Staff
Office of Planning, Analysis and Accountability
Office of the Chief Financial Officer
Mail Code 2723A
U. S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

Submitted electronically to: <http://www.regulations.gov>

**RE: Environmental Protection Agency (EPA) Request for Public
Comments: Draft FY 2011-2015 EPA Strategic Plan
Docket ID No. EPA-HQ-OA-2010-0486**

Dear Director Daub:

The American Nurses Association (ANA) welcomes the opportunity to comment on the Draft EPA Strategic Plan for FY 2011-2015.

ANA is the only full-service professional organization representing the interests of the nation's 3.1 million registered nurses (RNs), 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. Nurses have an interest in the Draft EPA Strategic Plan for FY 2011-2015 (hereafter referred to as the Plan) since the goals, strategies and measurements it outlines will directly affect and improve human health. 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 and EPA understand the relationship between human health and environmental exposures. By decreasing dangerous and unnecessary environmental exposures through the Plan, EPA will ensure a healthier future for all Americans. EPA will need increased financial and human resources to accomplish the goals set out in the Plan. ANA is particularly pleased with the care that EPA took in identifying at risk populations for certain types of environmental exposures, such as children, low income, minority and tribal communities that are disproportionately affected to exposures. This identification was observed throughout the Plan.

Goal 1: Taking Action on Climate Change and Improving Air Quality

ANA commends the EPA on this goal, particularly in EPA's desire to reduce greenhouse gas (GHG) emissions. ANA encourages the EPA to implement certain *mandatory* programs to reduce GHG emissions as opposed to *voluntary* programs which may not be as effective. Pages 7-8 of the Plan mention several types of GHG sources that will be issued new standards to decrease GHG emissions. Other sources of GHG emissions such as those from agriculture and power plants should have standards developed as well. Policies that endorse sustainable energy sources were regrettably absent in this first goal.

ANA recognizes and acknowledges that the challenges climate change brings are unprecedented in human history. In 2008, ANA's House of Delegates passed a resolution, *Global Climate Change*, stating that nurses must speak out and advocate for change in reducing greenhouse gas emissions, both on individual and policy levels. ANA supports public policy that endorses sustainable energy sources.

In regard to improving air quality, we applaud your effort to focus on "opportunities to reduce emissions from other large sources of air toxics risk, including petroleum refineries, chemical manufacturers, oil and natural gas production and coal-fired utilities." The need for this focus is immediate.

Goal 4: Ensuring the Safety of Chemicals and Preventing Pollution

ANA is pleased to see that the Plan states that chemical safety is one of EPA's highest priorities. However, ANA urges the EPA to go further in strengthening rules affecting chemical safety.

ANA is committed to safe chemical policy reform. As a member of the coalition *Safer Chemicals, Healthy Families* (SCHF), ANA supports the following platform:

- Immediate action on the worst chemicals
- Requirement for basic information on all chemicals
- Protection for the most vulnerable
- Use of the best science and methods
- Industry responsibility for demonstrating chemical safety
- Assurance of environmental justice
- Enhancement of government coordination
- Promotion of safer alternatives
- Assurance of right to know

In 2006, ANA House of Delegates passed a resolution entitled, *Nursing Practice, Chemical Exposure and Right-to-Know*. As such, we firmly support the following resolves:

- Reduce toxic chemical use
- Streamline the process for reducing toxic chemicals from production and commerce
- Require the use of safer chemical alternatives when possible
- Disclose adverse health effects of chemicals
- Support labeling and full disclosure of chemicals
- Provide adequate information on the health effects of chemicals *before* they are introduced on the market

ANA realizes several of the above points are included to some degree in the Plan. However, ANA would like to see *all* of these points reflected *in strong language* in the Plan.

Conclusion

The American Nurses Association looks forward to working with EPA to ensure and improve the quality of human health and the environment. 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 or 301-628-5105.

Sincerely,

A handwritten signature in cursive script that reads "Mary Jean Schumann". The ink is dark and the signature is fluid, with a large, stylized 'M' and 'J'.

Mary Jean Schumann, MSN, MBA, RN, CPNP
Chief Programs Officer
American Nurses Association