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For more information, please contact:
Jose Aguto
[Catholic Climate Covenant](http://CatholicClimateCovenant.org)
jose@catholicclimatecovenant.org
202-765-5545

Catholic Climate Covenant Testifies Against EPA’s “Reductionist” Approach to Mercury and Air Toxics Standards

Today, Catholic Climate Covenant [testified](#) before the U.S. Environmental Protection Agency (EPA) on the proposed changes to the Mercury and Air Toxics Standards (MATS). Specifically, the proposed rule would change the formula that weighs the costs and benefits of reducing additional pollutants while targeting mercury pollution from fossil fuel power plants.

Speaking on behalf of Catholic Climate Covenant, which includes [18 national](#) Catholic organizations, Associate Director Jose Aguto noted, “Much of what I say here today echoes the U.S. Conference of Catholic Bishops’ own [testimony](#) on this proposed rule.”

Drawing upon core principles of [Catholic social teaching](#) that “call us to care for God’s creation and protect the common good and the life and dignity of human persons, especially the poor and vulnerable, from conception until natural death,” as well as the [Environmental Protection Agency’s mission](#) to “protect human health and the environment,” Mr. Aguto voiced his objections. The proposed rule, the testimony contends, violates these fundamental pro-life, pro-family, and pro-environment teachings of the Catholic Church and the EPA’s own mission.

The Covenant—and many of its Catholic and faith-based partners—is concerned that the EPA is deploying a reductionist argument with this new rule when weighing costs and benefits. This will ultimately weaken the legal justification for future rules as well as cause great harm to human health and the environment. Aguto notes that in the encyclical *Laudato Si’*, Pope Francis shares this concern: “the fragmentation of knowledge and the isolation of bits of information can actually become a form of ignorance, unless they are integrated into a broader vision of reality.” ([Laudato Si’](#), no. 138.)

The testimony says that the EPA should give all due consideration to co-benefits when evaluating whether it is appropriate and necessary to regulate mercury and other toxic air pollutants. Mr. Aguto quoted testimony given by the [U.S. Conference of Catholic Bishops in support of the standards](#) when first proposed in 2011: “even in small amounts these harmful air pollutants in the environment are linked to health problems, particularly in children before and after birth, the poor and the elderly.” It is well documented that children are the most vulnerable population to suffer from mercury pollution. Unborn children experience the greatest risk of

suffering. The [EPA estimated](#) in 2016 that over 240,000 children have been exposed prenatally to mercury contamination.

The testimony noted that the co-benefits of regulating mercury emissions from power plants should not be separated from a dozen other pollutants that can cause cancer or neurological damage. Under the current MATS rule, many of these other pollutants are being reduced and those most impacted by power plant emissions—often the poorest and most vulnerable of our brothers and sisters—are benefitting as a result.

“A human life—at any stage of development—has inestimable value, for all persons are created in the image and likeness of God. Given the threat that these particular pollutants pose to unborn children, some of the most vulnerable among us, these principles must be upheld with utmost importance,” Mr. Aguto told the EPA.

He concluded: “We urge that the Agency find that regulation of these emissions from coal- and oil-fired power plants to be appropriate and necessary. We ask that EPA uphold the existing Mercury and Air Toxics Standards. By doing so, human life and the environment is valued justly, and EPA’s mission is honored.”

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