



Testimony of the Catholic Climate Covenant
at the public hearing on the Proposed Revised Supplemental Finding for
the Mercury and Air Toxics Standards and
Results of the Residual Risk and Technology Review

United States Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC
March 18, 2019

My name is Jose Aguto, and on behalf of [Catholic Climate Covenant](#), I thank you for providing us this opportunity to provide testimony on the proposed revision of the Supplemental Finding and Residual Risk and Technology Review of the Mercury and Air Toxics Standards. The Catholic Climate Covenant helps guide the U.S. Catholic Church's care for creation and care for the poor with our [18 national partners](#). Much of what I say here today echoes the U.S. Conference of Catholic Bishops own testimony on this proposed rule.

[Catholic social teaching](#) “calls 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.” [This teaching](#) calls us to believe “that every person is precious . . . and that the measure of every institution is whether it threatens or enhances the life and dignity of the human person.” In this spirit, Catholic Climate Covenant believes the proposed rule threatens, rather than enhances the life and dignity of the human person and is a renunciation of the [Environmental Protection Agency’s mission](#) to “protect human health and the environment.”

With the hope that this mission is carried out authentically, we ask that EPA give due consideration to co-benefits when evaluating whether it is appropriate and necessary to regulate mercury and other air toxic pollutants. We urge that EPA determine that it is indeed appropriate and necessary to regulate these emissions from coal- and oil-fired power plants. We ask that EPA not delist electric generating units from CAA section 112. We ask that EPA uphold, and not rescind the Mercury and Air Toxics Standards.

The existing standards currently provide important health protections for human beings and the environment which we all share. This is why the [US Conference of Catholic Bishops supported the standards](#) when they were first proposed in 2011, for “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](#) that over 240,000 children in 2016 have been exposed prenatally to mercury contamination.

Further, the Covenant is concerned that the EPA proposes to find that regulation of hazardous air pollutant emissions from coal- and oil-fired EGUs is not ‘appropriate and necessary’ when considering



the cost of compliance relative to the benefits of regulation. This reductionist approach to the regulation of pollutants greatly weakens the legal justification for this and future rules, ultimately causing greater harms to human health and the environment.

Catholic social doctrine affirms that “environmental protection cannot be assured solely on the basis of financial calculations of costs and benefits.” (*Compendium of the Social Doctrine of the Church*, no. 470.) The environment “cannot be regarded as something separate from ourselves.” (*Laudato Si'*, no. 139.) Pope Francis stated, “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 co-benefits of regulating mercury emissions from power plants cannot be separated from other pollutants conceptually, when the physical reality is clear. Numerous other hazardous air pollutants are emitted from power plants which affect human health, including arsenic, nickel, cadmium, and chromium which cause cancer, as well as lead, selenium, hydrogen chloride, hydrogen fluoride, sulfur dioxide and particulate matter, which can cause chronic and acute health disorders to the human body. (*76 Fed. Reg.* at 24978.) MATS and the subsequent technologies employed significantly reduce emissions from many of these other pollutants, thereby conferring even greater benefits to human health. It is indeed, appropriate and necessary to consider and regulate other HAP emissions from these sources.

At a more fundamental level, by intentionally seeking to exclude the full range of costs and benefits, especially upon the most vulnerable people among us, the proposed rule fails to respect the life and dignity of the human person. 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.

Therefore, we ask that the Agency find the consideration of co-benefits to be appropriate and necessary when evaluating the regulation of mercury and other air toxic pollutants. 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.

Thank you.

For more information, please contact:

Jose Aguto

[Catholic Climate Covenant](http://CatholicClimateCovenant.org)

jose@catholicclimatecovenant.org

202-765-5545