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Pennsylvania Council of Churches

Harrisburg Hearing on Pennsylvania's Mercury Rulemaking
July 26, 2006

Statement by: The Rev. Sandra L. Strauss
Director of Public Advocacy
Pennsylvania Council of Churches
900 S. Arlington Avenue, Suite 100, Harrisburg, PA 17109
(717) 545-4761; Fax (717) 545-4765; s.strauss@pachurches.org

I am the Rev. Sandra L. Strauss, Director of Public Advocacy for the Pennsylvania Council of Churches. As an organization made up of 43 member bodies representing 20 Anglican, Orthodox, and Protestant communions, we represent thousands of persons of faith throughout the Commonwealth. I am here to testify today with respect to an issue that is of significant concern to the Council's constituents—mercury.

We believe that in a healthy society, the well-being of all is a priority, and that we have a particular responsibility when it comes to protecting the well-being of the most vulnerable—those Jesus refers to as “the least of these.” We acknowledge that creation belongs to God, and that we are called to act as stewards of creation on God's behalf. We envision a Commonwealth that honors the integrity of God's good creation and acknowledges our dependence upon and solidarity with creation, and assert that decisions that would affect creation require careful discussion among all who would be affected. Therefore, we support government decisions related to the land and the environment that eliminate any discrimination that occurs when people have little or no voice in decisions affecting them. We also hold up the principle of sustainability, which suggests priorities that may include, but not be limited to preservation of clean land, air and water. Because we support the health and well being of all, the creation of a cleaner environment, and policies that promote sustainability and responsibility in the use of our precious natural resources, we support the Pennsylvania Department of Environmental Protection's proposed rulemaking “Standards for Contaminants: Mercury” that would amend Chapter 123 of the Pennsylvania Code.

We know from experience that dangerous outcomes result when short-term practices continue unabated—such as permitting the relatively uncontrolled emissions of a dangerous substance like mercury. There are, of course, quality of life issues that sound like merely a nuisance—some might say so what if we can't eat significant amounts of fish caught in our rivers in Pennsylvania? But the problem is much greater than that.

We understand that Pennsylvania's power plants released more mercury into the air in 2004 than all but one other state—Texas—and that they are responsible for 83 percent of the state's mercury emissions. Testing throughout Pennsylvania has shown that mercury levels in our streams are so high that there is virtually no place where consumption of fish is safe, and there are areas near some of our coal-fired power plants that are particularly deadly. These “hot spots” of mercury contamination create a danger that neither the people nor the wildlife living in the area can avoid. The methylmercury that we find in the environment contributes to health problems not only for people, but also for all other creatures that are exposed to it. We now know that mercury has entered our food chain to such a degree that the U.S. Centers for Disease Control has indicated that over 600,000 women of childbearing age in the U.S. have enough mercury in their bodies to place a fetus or a nursing child at risk for brain damage.

Knowing all the harmful outcomes related to mercury in our environment—particularly for those who are most vulnerable—it would be not just irresponsible, but unconscionable, NOT to act immediately to prevent the risk. The DEP's proposed mercury rulemaking expedites the response to the mercury problem, and guarantees that there will be reductions in mercury released into the environment in Pennsylvania. The federal Clean Air Mercury Rule does not. In fact, the trading system proposed in the federal rule means that the situation in Pennsylvania could remain unchanged—Pennsylvania facilities could continue to pollute at their current high levels by purchasing credits from facilities elsewhere that have surpassed the federal mercury standard. We cannot sustain the quality of life for future generations when we compromise in this way, and when our decisions ignore the larger impact on the entire planet and its ecosystems.

Briefly, in my introduction, I noted concern over what happens when we—common citizens—have little or no voice in decisions affecting them. We believe that a just Commonwealth protects the rights of individuals