

**Environmental Working Group's (EWG's) comments on the
Draft Environmental Health Surveillance Report
December 10, 2003**

The Draft Environmental Health Surveillance Report is a valuable and well-documented review of environmental health tracking needs for California. EWG was particularly pleased to see a detailed discussion of disparities in exposure to environmental hazards and illness included in the report. We have the following comments and recommendations:

Finding 1: Office of Environmental Health Tracking

The proposed Office of Environmental Health Tracking would be a valuable addition to existing efforts. We recommend that the office be part of Cal-EPA, because that agency has the authority to regulate the use of environmental chemicals, which is the presumed goal of all tracking efforts.

**Finding 2: Central Clearinghouse for California
Environmental Health Tracking Databases**

Data dissemination will be a core function of any Central Clearinghouse. The Draft Report should be more specific about ways to protect confidential information while providing greater access to health records from state databases. We understand the need to provide full protections to individual confidentiality. However, crucial information might be obscured when data is released in summary format only. We urge the Working Group to commit to providing data in the most detailed format possible.

We were very encouraged to see the Working Group's commitment to providing individuals with information about their personal exposure to environmental hazards. (Page 132) We hope that this will also include biomonitoring and health data as well (including CalHANES and CalHEXAS).

Finding 3: Rebuilding resources

We strongly agree that funding must be returned to the Birth Defect Monitoring Program and to DEODC and OEHHA in general. A robust tracking program is dependent on fully functioning environmental and health divisions.

Finding 4: More complete data on environmental hazards

The report points out that there is no toxicity information for 43 percent of chemicals manufactured in the U.S. and outlines two highly cost-effective options for collecting additional information on chemical releases. The Working Groups should explore additional possibilities for data collection from sources consuming or releasing environmental toxins. Also, mechanisms to fund basic research on the environmental hazards posed by commonly used and untested chemicals must be identified and made a priority of a tracking program.

The Working Group should strengthen its recommendation to improve environmental data collection. The currently proposed \$370,000 pilot project is less than half of the amount recommended to improve biomonitoring infrastructure. If we lack the basic information about commonly used chemicals it much more difficult to draw meaningful links between environmental exposures and health outcomes.

Finding 5: Monitoring human exposure to chemicals

The proposed statewide biomonitoring and exposure assessment programs (CalHANES and CalHEXAS) will provide a valuable reference point for local studies. They should be designed to supplement national efforts and avoid redundancy wherever possible.

In addition to tracking known contaminants, the tracking project should devote time and resources to emerging chemical contaminants. Recently perfluorinated compounds and brominated diphenyl ethers have been discovered to be ubiquitous pollutants in the bodies of people in the U.S. Biomonitoring studies brought this attention to policymakers and the public, and resulted in immediate action by chemical manufacturers to voluntarily withdraw several chemicals from the market.

Findings 8, 9: Environmental Inequity/Environmental Justice

The principles of environmental justice are invaluable to any tracking and intervention effort. We would recommend that the Working Group recognize the contributions of local communities to tracking efforts. Community members and community-based organizations can contribute local knowledge about environmental conditions and community

practices which valuable contributions to surveillance efforts.