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The Medical Society Consortium on Climate and Health (Consortium) is comprised of 25 medical societies with a membership of well over half the physicians in the U.S.¹ The Consortium opposes the U.S. Environmental Protection Agency (EPA's) proposed amendments to the 2012 and 2016 New Source Performance Standards (NSPS) for the Oil and Natural Gas Industry, Docket No. EPA-HQ-OAR-2017-0757. This proposal would do away with the requirements that oil and gas companies install technology to detect and fix methane leaks from wells, pipelines, and storage facilities. It also re-opens the question of whether the Environmental Protection Agency (EPA) has the legal authority to regulate methane as a pollutant.

The EPA fact sheet on this action says the following:²

“EPA is issuing today’s proposal in response to President Trump’s Executive Order on Promoting Energy Independence and Economic Growth. That order directs agencies to review existing regulations that potentially “burden the development or use of domestically produced energy resources,” including oil and natural gas, and to rescind or suspend regulatory requirements if appropriate.

- The proposed amendments would remove all sources in the transmission and storage segment of the oil and natural gas industry from regulation under the New Sources Performance Standards (NSPS), both for ozone-forming volatile organic compounds (VOCs), and for greenhouse gases (GHGs). The existing NSPS regulates GHGs through limitations on emissions of methane.
- The amendments also would rescind the methane requirements in the 2016 NSPS that apply to sources in the production and processing segments of the industry.”

The existing standards that are rolled back in this proposal curb the escape of methane and volatile organic compounds (VOCs) during the extraction and delivery of new oil and gas sources. Thus, the proposal would undo standards that limit harmful fossil fuel pollution. **The**

¹ www.medsocietiesforclimatehealth.org

² https://www.epa.gov/sites/production/files/2019-08/documents/fact_sheet_proposed_amendments_to_nsps_for_oil_and_natural_gas_industry.8.28.19.pdf
Accessed October 17, 2019.

rollback directly endangers the health of millions of people throughout the United States who receive medical care from U.S. physicians. This proposal also threatens to do widespread damage to our life supporting atmosphere and thus has profound implications for the health and wellbeing of all Americans and all populations of people around the world.

The directly damaging health impacts of increases in methane are diverse and far reaching. Increasing evidence from the last couple of decades shows that greater methane exposure is detrimental to pregnancy and newborn health leading to higher levels of premature birth and low birth weight. A growing body of peer-reviewed science documents negative health outcomes, such as premature birth, congenital heart defects, neural tube defects, and low birth weight for infants born to mothers living near natural gas drilling sites.^{3,4}

Adverse effects include more irritation of the eyes, ears, nose, throat and lungs from ozone smog, especially on warm sunny days when the concentration of ozone at ground level rises as heat and light cause a transformation of ambient fossil fuel emissions. This negative effect on the ozone at ground level is evidenced by the deterioration of the Air Quality Index on hot sunny days.

People most at risk of harm from breathing these air pollutants from the oil and natural gas industry include infants, children and teenagers; older adults; pregnant women; people with asthma and other lung diseases; people with cardiovascular disease; people with diabetes; people with low incomes; and healthy adults who work or exercise outdoors. Many people live and work in communities near oil and gas facilities. Unfortunately, many of these people are the nation's poor and disregarded. Drilling, refining and storage operations are often located near low income or minority communities. This is an environmental injustice.

Our organizations are united in our acknowledgement that emissions from all fossil fuels contribute to warming of the atmosphere. The Consensus statement supported by all Consortium societies states,

“We – the undersigned medical societies – support the international scientific consensus, as established in multiple national and international assessments, that the Earth is rapidly warming, and that human actions (especially burning of fossil fuels) are the primary causes. As established in the 2016 U.S. Climate and Health Assessment – The Impacts of Climate Change on Human Health in the United States: A Scientific Assessment – the resulting changes in our climate are creating conditions that harm human health through extreme weather events, reduced air and water quality, increases in infectious and vector-borne diseases, and other mechanisms.

³ Denicola N, Bekkar B, Pacheco S, Rupa B. A Scoping Review of Climate-Change Related Exposures on Obstetrics Outcomes. *Obstetrics & Gynecology*: [May 2019 - Volume 133 - Issue - p 78S](#)

⁴ Project TENDR: Targeting Environmental Neuro-Developmental Risks. The Consensus Statement, *Environmental Health Perspectives*, volume 124/number 7/July 2016. <http://dx.doi.org/10.1289/EHP358>

Of striking importance to this rollback is the fact that methane has an even greater warming effect than carbon dioxide. Methane absorbs and re-releases more heat than carbon dioxide does. In the first two decades after it enters the atmosphere, it has an 80-fold greater warming effect. This increased warming effect contributes disproportionately to the changes that are causing damage to people's health in the U.S. and around the globe.

These changes are of such concern that over 125 leading national health systems, nursing and medical organizations, and schools of medicine, nursing, and public health recently announced that climate change is a "public health emergency." (climatehealthaction.org)

This public health emergency is increasingly apparent. Extreme heat is leading to rising emergency room visits, hospitalizations, and mortality. Drought and resultant lengthening of wildfire season is causing greater exposure to smoke inhalation at a range as far as hundreds of miles away. This also leads to costly emergency room visits and hospitalizations--especially for those with underlying asthma and breathing problems. Spread of infectious diseases carried by mosquitos and ticks, and longer allergy seasons are growing problems. More severe storms with deadly and destructive flooding are leading to long-lasting and costly displacement of people from their homes. This is the cause of rising mental stress and economic loss. The current standards are not only a check on methane and other gases, they also limit emissions of toxic and carcinogenic air pollutants, benefiting health of people we care for in communities across the country.

Because reducing emissions of methane from the oil and gas industry is critical to protecting health from the impacts of climate change, we strongly oppose these rollbacks of regulations that are intended to protect the public's health.