December 4, 2025

The Honorable Robert F. Kennedy, Jr.
Chairman of the Make America Healthy Again Commission
Secretary
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20201

The Honorable Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Urgent Request for Special Review of Pesticides Used on Christmas Trees Pursuant to 40 C.F. R. § 154.10

Dear Administrator Zeldin, Chairman Kennedy, and Commissioners,

This Christmas season, we urgently request that the Environmental Protection Agency ("EPA") initiate a special review of pesticides used on Christmas trees to ensure that children and families can celebrate the holiday safely and to restore the cherished tradition of bringing safe Christmas trees into American homes.[1]

As Christmas approaches, roughly 30 million Christmas trees will be purchased and displayed in homes and businesses across the United States.[2] However, few Americans are aware that most commercially raised Christmas trees are grown with heavy drenchings of toxic pesticides that can remain on trees long after application, or that many of these pesticides are linked to cancer and neurological harm in children.[3] While the EPA is required to determine the "safe" level of pesticide residue permitted on food – known as a pesticide tolerances – no such requirement exists for Christmas trees or other nursery plants.[4] This is despite the fact that young children and pets are often directly exposed to treated portions of the Christmas trees brought into their homes

[1] See 40 C.F.R. § 154.10 "[t]he Administrator may evaluate a pesticide use under the criteria of § 154.7 either on his own initiative, or *at the suggestion of any interested person.*" (emphasis added); 40 C.F.R. § 154.34.
[2] National Christmas Tree Associations, Quick Tree Facts, (last accessed Nov. 20, 2025) https://realchristmastrees.org/education/quick-tree-facts/.
[3] Greta C. Gallina, Bert M. Cregg, Eric L. Patterson & Debalina Saha, *A Review of Chemical Weed Control Practices in Christmas Tree Production in the United States*, 13 FORESTS 250 (2022), https://www.mdpi.com/1999-4907/13/2/250; Yi Wu, Jiaxi Ye, Yanxia Qi & Shaoyong Zhang, *Detection of avermectin pesticide residues in pine trees based on magnetic Solid-Phase extraction combined technology*, 15 SCIENTIFIC REPORTS 37138 (2025). https://www.nature.com/articles/s41598-025-21114-2.
[4] 21 U.S.C. § 346(a).

to celebrate this most wonderful time of the year. Children can come into direct contact with pesticide residues when they hang ornaments, unwrap presents beneath the tree, play around with or even swallow fallen pine needles. Likewise, pets often sit beneath their Christmas trees, rub up against branches, and can ingest pine needles, all resulting in potential exposure to pesticides. Even the modest heat from Christmas tree lights can cause pesticides to volatize in the air, creating an inhalation risk for families and pets.[5] And while the EPA typically assesses residential exposure as part of its human health risk assessment for pesticides, it fails to assess exposures from treated Christmas trees.[6]

This is a consequential omission, as even low levels of pesticide exposure can permanently harm young children's neurological and behavioral development.[7] Pets are also very sensitive to pesticide exposure, which is the single most important cause of suspected poisoning in domestic animals.[8] Moreover, Christmas tree production, like other nursery stock, relies heavily on repeated application of multiple pesticides including chlorpyrifos, carbaryl, dimethoate, bifenthrin, chlorothalonil, glyphosate, hexazinone, imidacloprid, simazine, and 2-4,D just to name a few. Many of these chemicals are known for their well-documented harms to children. Further, families bringing Christmas trees into their homes can be exposed to a cumulative mix of dangerous chemicals.[9] Unfortunately, since the EPA has never undertaken the needed and petitioned for assessment, this exposure has never been quantified, despite the obvious risk to people and pets.[10] And as the final Make America Healthy Again strategy ("MAHA Strategy") held, since "[c]hildren are exposed to an increasing number of synthetic chemicals . . . linked to developmental issues and chronic disease" it is imperative that the pesticide review process is "continually evaluated to ensure that chemicals and other exposures do not interact together to pose a threat to the health of our children."[11]

Therefore, we implore the EPA to immediately initiate a Special Review pursuant to 40 C.F.R. § 154.10 to update the human health risk assessments for all pesticides currently registered for use in Christmas tree production to account for residential exposure and to require modifications to their registrations if necessary to ensure potential residues do not cause unreasonable adverse

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[5] Thirasant Boonupara et al., *Airborne Pesticides from Agricultural Practices*, 13 Environmental Research Communications 119 (2023) https://pmc.ncbi.nlm.nih.gov/articles/PMC10611335/; Thomas Kromer, Holger Ophoff, Andreas Stork & Fritz Führ, *Photodegradation and Volatility of Pesticides: Chamber Experiments*, 11 ENVIRON. SCI. POLLUT. RES. INT' L 107 (2004) https://pubmed.ncbi.nlm.nih.gov/15108858/.

[6] See e.g. infra note 30, 34, 38.

[7] Jianghong Liu et al., *Pesticide Exposure and Child Neurodevelopment: Summary and Implications*, 60 WORKPLACE HEALTH & SAFETY 235 (2012) https://pmc.ncbi.nlm.nih.gov/articles/PMC4247335/.

[8] Francesca Caloni et al., *Suspected Poisoning of Domestic Animals by Pesticides 539* SCI. TOTAL ENVTL. 331 (2016) https://www.sciencedirect.com/science/article/abs/pii/S0048969715306665.

[9] Molly N. Darr et al., *Arthropod and Disease Management in Fraser Fir (Pinales, Pinaceae) Christmas Trees in the Southeastern United States*, 13 J. INTEGRATED PEST MGMT. 8 (2022) https://academic.oup.com/jipm/article/13/1/8/6549871#340726840; Bill Lindberg et al., *Michigan Christmas Tree Pest Management Guide 2025* (Michigan State Univ. Extension 2025), https://www.canr.msu.edu/christmas_trees/uploads/files/MCTPMG%202025%205.0.pdf; Bernard Zandstra & Jill O'Donnell, *Weed Control in Christmas Trees*, Extension Bulletin E-3237 (Mich. State Univ. Extension Mar. 2015), https://www.canr.msu.edu/outreach/uploads/2018-files/E3237%20hires.pdf.

[10] 40 C.F.R. § 154.7(1), (2), (6).

[11] Make America Healthy Again Commission, *Make Our Children Healthy Again: Strategy Report* at 2 (White House Sept. 9, 2025), https://www.whitehouse.gov/wp-content/uploads/2025/09/The-MAHA-Strategy-WH.pdf

effects.[12] We encourage the EPA to focus on carbaryl, chlorpyrifos and dimethoate, pesticides linked to demonstrated deleterious impacts to children's health that have been used in tree production for over fifty years without undergoing a residential exposure assessment. To support this review, we have provided more information below and attached relevant studies. Additionally, since the Special Review implicates a threat that "certain chemicals and certain other exposures pose to children" we request that the President's Make America Healthy Again Commission engage directly with the EPA to expeditiously and thoroughly review this potential route of pesticide exposure.[13] We urge the EPA to act quickly and to save children from toxic exposures when celebrating the cherished traditions of Christmas by beginning this review and issuing a warning of potential exposure risks associated with pesticides on Christmas trees obtained from tree nurseries that use pesticides.

BACKGROUND

Nothing says Christmas quite like a Christmas tree. An enduring emblem of the holidays, the Christmas tree has been used in celebration of the season for hundreds of years. Evergreen trees have been used in Celt, Roman, and Egyptian holiday celebrations, but the history of modern Christmas trees are rooted in Central European celebration of Christmas.[14] Early references of Christmas trees date back to 1441, where a tree was erected in front of a town hall in Tallinn Estonia for a dance.[15] The Latvian city of Riga has long claimed to have homed the first 'official' Christmas tree, erected in 1510 when a local merchants guild decorated a tree with thread, straw, and apples. Protestant reformer Martin Luther was first said to have added lighted candles to the Christmas tree, hoping to recreate the sight of stars twinkling through the evergreens for his family.[16] However, the first recorded use of an indoor Christmas tree, decorated for the season, dates back to 1539 when a tree was placed in the Cathedral of Strasbourg by German Lutherans.[17]

The Christmas tree tradition was first introduced to North America in 1781, when Hessian soldiers stationed in Quebec held a Christmas party with a fir tree decorated with candles and fruits.[18] Christmas trees were reportedly displayed in the homes of German settlers in the 1830s, and outdoor community Christmas trees were common in Pennsylvania as well.[19] By the 1890s,

[12] 40. C.F.R. §§ 154.1, 154.10; *See also generally*, U.S. Const. Amend. I *and* 5 U.S.C. § 553(e). Should the EPA fail to respond to this petition in a timely manner, the Center for Biological Diversity may pursue relief in federal court.
[13] *Establishing the President's Make America Healthy Again Commission*, Exec. Order No. 14212 § 4(a)(i) (Feb. 13, 2025).
[14] Lorris Chevalier, *First Christmas Tree*, Medievalists.net (Dec. 2023), https://www.medievalists.net/2023/12/first-christmas-tree/.
[15] *Id.*
[16] *History of Christmas Trees*, History, (last accessed Dec. 2, 2025) https://www.history.com/articles/history-of-christmas-trees.
[17] Frank C. Senn, *Introduction to Christian Liturgy* 118 (Fortress Press 2012).
[18] Goethe-Institut Canada, *Sorel and the First Christmas Tree in the New World* (last accessed Dec. 2, 2025) https://www.goethe.de/ins/ca/en/kul/ges/dsk/dsm/sdw.html.
[19] UF/IFAS Extension Hillsborough County, *Brief History of the Christmas Tree in the United States* (Dec. 15, 2017) https://blogs.ifas.ufl.edu/hillsboroughco/2017/12/15/brief-history-christmas-tree-united-states/.

Christmas trees were rising in popularity in the United States. And while Europeans preferred small trees, Americans preferred Christmas trees from floor to ceiling.[20]

The first known Christmas tree in the White House was in 1889, during the Harrisson administration, which was decorated with candles for the Harrison grandchildren.[21] 1923 saw the first 'National Christmas tree lighting,' when President Calvin Coolidge lit a 48-foot Balsam fir from his home state of Vermont that was harvest from a forest preserve, making the beginning of a once a year tradition that continues to this day. However, Christmas trees then were not extensively farmed or grown with heavy pesticide use. Back then, the beauty of Christmas trees came straight from the forest. Fortunately, this practice still exists in some form today, as some families visit national forests which allow them to select a tree growing wild in the woods to bring home for Christmas celebrations.

The first Christmas tree farm was established in 1901, but most families continued to obtain their trees from forests until the 1930s and 1940s.[22] It was not until after World War II that more trees began to be grown in commercial settings, with farmers beginning to groom trees to meet consumer expectations. At the same time, pesticide use exploded in the United States, and many of these new chemicals began to be regularly used on Christmas tree farms. By the early 21st century, almost 98 percent of all Christmas trees sold worldwide were grown on farms, many of which use pesticides.[23]

PESTICIDE USE ON CHRISTMAS TREES

Pesticide use in Christmas tree production has not changed significantly over the last few decades. Christmas trees, like other nursery stock, are often grown in vast monoculture environments making them highly susceptible to pest outbreaks, and since the industry has a zero tolerance for even minor aesthetic damage and is not constrained by food tolerances, frequent, heavy pesticide application is the norm.[24] Pesticides can remain on trees as residues after application, and higher, more frequent applications typically result in higher residues.[25] Higher residues generally means greater exposure risk to children, which is an immediate concern given the types of chemicals commonly used in Christmas tree production.

Many pesticides used in Christmas tree production are linked to cancer and neurological harm in children. The most recent publicly available information from the United States Department of

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[20] *History of Christmas Trees*, History, (last accessed Dec. 2, 2025) https://www.history.com/articles/history-of-christmas-trees.
[21] White House Historical Association, *White House Christmas Trees* (last accessed Dec. 2, 2025) https://www.whitehousehistory.org/press-room/press-backgrounders/white-house-christmas-trees.
[22] Forest Society, *Forest Journal: O Christmas Tree, O Christmas Tree* (Dec. 16, 2024), https://www.forestsociety.org/blog-post/forest-journal-o-christmas-tree-o-christmas-tree; Federal Reserve Bank of St. Louis, *A Quick History of the Christmas Tree Industry* (Dec. 19, 2017) https://www.stlouisfed.org/open-vault/2017/december/history-christmas-tree-industry
[23] Thomasnet, *The Once-a-Year Billion Dollar Industry: Christmas Trees by the Numbers* (Nov. 30, 2023) https://www.thomasnet.com/insights/the-once-a-year-1-trillion-industry-christmas-trees-by-the-numbers
[24] Darr, Coyle & Jetton, supra note 9
[25] Dugald J MacLachlan & Denis Hamilton *A Review of the Effect of Different Application Rates On Pesticide Residue Levels in Supervised Residue Trials* 67 Pest Mgmt Sci. 609 (2011) https://scijournals.onlinelibrary.wiley.com/doi/10.1002/ps.2158; Wu et al. supra note 3

Agriculture is a 2009 survey growers in six states (Oregon, Michigan, Pennsylvania, California, Florida and Texas, accounting for 63 percent of Christmas trees produced in the United States) on pesticide-use patterns.[26] Eighty-five percent of usage consisted of eight pesticides, seven of which are still authorized for use on Christmas trees today: chlorothalonil, simazine, glyphosate, hexazinone, carbaryl, chlorpyrifos and dimethoate. More recent information from Michigan State University illustrates that a wide variety of herbicides, insecticides, and fungicides are registered for use on Christmas trees, including bifenthrin, imidacloprid, mancozeb, and 2-4,D.[27]

For centuries, Christmas was celebrated with trees that were grown without toxins or naturally harvested from the forest. And while many things have changed in the last 70 years, tree production still uses many of the same old toxic pesticides, with dozens of new pesticides now used in addition.

SPECIFIC PESTICIDES USED ON CHRISTMAS TREES

While over 60 different pesticides products are registered for use on Christmas trees, this petition will highlight just a few active ingredients, and the specific concerns associated with these chemicals that give rise to the need for the EPA to urgently grant this petition.[28]

Chlorpyrifos, registered for use in 1965, is a highly-toxic organophosphate pesticide linked to permanent brain damage in children and is in the same chemical class as nerve agents used in war.[29] The extensive body of evidence regarding the harms posed by this notoriously toxic pesticide is widely available and in the EPA's possession, thus it won't be repeated here except to note its existence. Even though this chemical is banned in 44 countries and the states of California and Hawaii, and even though dozens of alternative chemical and non-chemical insect controls exist, the agribusiness industry continues to rely heavily on chlorpyrifos, stating that "one of the only insecticides they have to use is chlorpyrifos"[30] While chlorpyrifos use in food production is allowed in limited amounts, this chemical has been banned for residential uses since the Clinton Administration, due to an unreasonable risk of harm to children even in miniscule amounts.[31] However, its heavy use on Christmas trees allows it to still permeate American households. The EPA's assessment of this chemical ignores the Christmas tree pathway and assesses residential exposure only from treated golf courses and after mosquito spraying events.[32] This is despite the fact that the pre-harvest interval –the time between final

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[26] United States Department of Agriculture, National Agricultural Statistics Service, *Quick Stats*, https://quickstats.nass.usda.gov/results/4DA7C33B-F8EF-3EB3-900F-C3AA40232264

[27] See supra note 9

[28] North Carolina Cooperative Extension, *Pesticides Labeled for Use on Christmas Trees in North Carolina* (last accessed Dec. 2, 2025) https://christmastrees.ces.ncsu.edu/christmastrees-pesticides-labeled-for-use-on-christmas-trees-in-nc/

[29] *What You Need to Know About Chlorpyrifos*, (last accessed Dec. 2, 2025) https://earthjustice.org/feature/chlorpyrifos-what-you-need-to-know

[30] Tony Schick, *A Toxic Pesticide Once Targeted For A Ban Was Probably Sprayed On Your Christmas Tree*, OPB, (Dec. 14, 2018) https://www.opb.org/news/article/toxic-pesticide-christmas-tree-harmful-children/.

[31] U.S. EPA, *Dursban Announcement* (June 8, 2000) https://www.epa.gov/archive/epa/aboutepa/dursban-announcement.html; U.S. EPA, *Chlorpyrifos — Ingredients Used in Pesticide Products* (last accessed Dec. 2, 2025) https://www.epa.gov/ingredients-used-pesticide-products/chlorpyrifos.

[32] U.S. EPA, *Chlorpyrifos: Third Revised Human Health Risk Assessment for Registration Review*, Docket No. EPA-HQ-OPP-2008-0850-0944 at 36-37 (Sept. 22, 2022).

pesticide application and harvest – is zero days for Christmas trees, meaning chlorpyrifos can be sprayed on trees just moments before families come to joyfully collect their trees.[33]

Carbaryl, registered for use in 1959, is a neurotoxic insecticide in the carbamate class of pesticides, which are very similar to organophosphate such as chlorpyrifos. The EPA has designated carbaryl to be a "likely" carcinogen, and yet it still permits use on Christmas trees.[34] Carbaryl has been linked to neurological effects, developmental toxicity, and disruptions to the endocrine system, particularly in children.[35] Carbaryl has further been linked to stomach cancer as well as increased risk for multiple other cancers.[36] Despite the EPA's acknowledgement and potential risks, it has not assessed exposure to children for Christmas trees sprayed with pesticides, even in its updated occupational and residential exposure assessment.[37]

Dimethoate, first registered in 1960, is another organophosphate pesticide linked to cancer, endocrine disruption, neurodevelopmental harm, and reproductive toxicity.[38] It is also highly mobile in the environment and toxic to plants, pollinators, and aquatic life.[39] Dimethoate has been banned in the European Union since 2019, and more recently, was banned in Australia for use on berries.[40] However, even in the EPA's second revised risk assessment for dimethoate, which to the EPA's credit did acknowledge incidents of dimethoate exposure on Christmas tree farms, it failed to consider residential exposure or provide any mechanisms to protect American families from household exposure.[41]

This is just a small sampling of some of the chemicals used on Christmas trees and some of their effects. Given the impending danger surrounding the holiday season, we request that EPA immediately review these chemicals to ensure the safety of the American people. While others could be listed, it is ultimately the job of the EPA to properly consider and assess all the chemicals used on Christmas trees, as this petition requests.

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[33] *Id.* at 8.
[34] National Pesticide Information Center, *Chemicals Evaluated for Carcinogenic Potential* (Oct. 30, 2024), https://npic.orst.edu/chemicals_evaluated.pdf; Michigan State University Extension, *Managing Grubs in Christmas Trees* (May 16, 2008) https://www.canr.msu.edu/news/managing_grubs_in_christmas_trees.
[35] Iwa Lee et al., *Developmental neurotoxic effects of two pesticides: Behavior and biomolecular studies on chlorpyrifos and carbaryl*, 288 Toxicol. Appl. Pharmacol. 429, 429–38 (2015) https://pubmed.ncbi.nlm.nih.gov/26314619/
[36] Brian Bienkowski, *Cancer Risk Doubles for Iowa, NC Pesticide Applicators Who Used Carbaryl, Study Finds*, THE NEW LEDE (July 9, 2025) https://www.thenewlede.org/2025/07/carbaryl-cancer-risk/dm.
[37] U.S. EPA, *Pesticide Registration Review; Proposed Interim Decision for Carbaryl, Notice of Availability*, 87 Fed. Reg. 73,763 (Dec. 1, 2022)
[38] *Dimethoate in the United States: Harmful Health Effects and Widespread Use*, (last accessed Dec. 2, 2025) https://earthjustice.org/feature/organophosphate-pesticides-united-states/dimethoate.
[39] Van Scoy, Ann & Pennell, Amy & Zhang, Xiaomei, Environmental Fate and Toxicology of Dimethoate, 237 Rev. Environ. Contam. & Toxicol. 53 (2016) https://pubmed.ncbi.nlm.nih.gov/26613988/.
[40] Brandon Long, *Regulator Suspends Use of Dimethoate Insecticide on Berries*, ABC NEWS (Nov. 12, 2025) https://www.abc.net.au/news/2025-11-12/apvma-suspends-dimethoate-use-on-berries/106001530
[41] U.S. EPA *Second Revised Draft Human Health Risk Assessment for Dimethoate*, EPA-HQ-OPP-2009-0073 (Dec. 21, 2023)

THE EPA HAS FAILED TO PROTECT CHILDREN FROM CHRISTMAS TREE PESTICIDE EXPOSURES

Exposure to even low levels of many of the pesticides used on Christmas trees can negatively impact young children in many ways, including, potentially causing neurological problems and impairing development.[42] As the first Make America Healthy Again report ("MAHA Report") correctly notes, children are not "little adults" when it comes to chemical exposure and are in fact uniquely vulnerable to permanent harm from even minor exposures.[43] In addition to unique vulnerabilities, children are often more frequently exposed to pesticides. The MAHA Report notes that infants specifically exhibit hand-to-mouth behavior causing them to frequently ingest invisible chemicals, including household dust containing detectable levels of pesticides.[44] Already, there is a widespread presence of pesticides in U.S. homes, with a 2009 survey by the EPA and the Housing and Urban Development finding "almost 90% showing measurable levels of at least one insecticide on their floors."[45] This elevated baseline is compounded in December when Christmas trees coated with pesticides are brought into millions of American households. Young children spend significant time near, under, and around their Christmas tree, exposing them to chemicals coating the branches but also the mixture of pesticide-contaminated dust permeating the room. Infants may swallow both dust and pine needles that fall from the tree, leading to direct ingestion of pesticide residues that presents an unreasonable risk. But as detailed above, the EPA does not adequately assess this risk in any pesticide registration, putting the public writ large at substantial risk as Christmas approaches.

REQUESTED ACTION

The EPA should act now to grant this petition and conduct a Special Review in order to protect American families. Complete omission of an important residential pathway is exactly the situation warranting a Special Review by the EPA. The specific purpose of the Special Review is to inform the EPA's decision on whether a product may cause unreasonable adverse effects and is intended to assess whether *individual uses* (i.e. spraying on Christmas trees) pose a significant risk, and whether modifications to the registration of the chemicals in question are warranted.[46] So long as the EPA is provided with other significant evidence – meaning factually significant information that relates to the uses of a pesticide and its adverse risk to humans or to the environment – that use of a pesticide poses a risk no longer offset by alleged benefits, a Special Review may be conducted.[47] After sending a preliminary notice to affected registrants, the EPA is subsequently able to communicate with parties to "explore factual and substantive positions, or discuss regulatory options" concerning species review.[48] Therefore, while a Special Review process may result in a pesticide in question returning to the registration process or a product cancellation, the EPA can also consider whether to require simple modifications to a registration

[42] Jianghong Liu & Erin Schelar, *Pesticide Exposure and Child Neurodevelopment: Summary and Implications*, 60 WORK. HEALTH & SAFETY 235 (2012).
[43] MAHA Report at 39.
[44] MAHA Report at 42.
[45] MAHA Report at 42.
[46] 40 C.F.R. § 154.1.
[47] 40 C.F.R. § 154.3; 40 C.F.R. § 154.7.
[48] 40 C.F.R. § 154.27.

as well as information from the registrant to prove that risks can be reduced to acceptable levels without formal proceedings.[49]

In this case, the historical failure to assess residential exposure from treated Christmas trees, especially given the significant evidence that young children and infants are at greatest risk of exposure, warrants the EPA to initiate a Special Review. Without this assessment, exposure to pesticides will continue to spike around Christmas time, creating a chemical "war on Christmas" with hundreds of thousands of children unknowingly exposed, or even warned, about potential dangers. Especially for very young children experiencing their first Christmas, this exposure is particularly damaging and must be addressed in the EPA's assessments. Moreover, the social and economic benefits of heavy pesticide use in Christmas tree production purely for aesthetic reasons are not offset by the risk posed to families, especially children, from increased pesticide residue exposure at home.[50]

Given the impending spike in pesticide exposure from the Christmas season, we urge the EPA to take expedited action and issue both its notice of preliminary determination and notice of special review simultaneously.[51] Any and all actions must be taken to ensure that Americans across the country are both protected from and aware of the potential risks that pesticide-coated Christmas trees pose during what otherwise should be the most wonderful time of the year. For hundreds of years, Christmas was celebrated without use of these toxic chemicals, and we implore the EPA to restore this time-honored tradition to keep our children safe while celebrating Christmas.

CONCLUSION

As Americans, and especially children, are exposed to more chemicals than ever before, it is unacceptable for the joys of Christmas to add to this toxic burden. Therefore, we urge the EPA to initiate a Special Review and restore the American tradition of non-toxic Christmas trees, saving our children from toxic pesticide exposure. We encourage the MAHA Commission to work quickly to bolster the EPA's efforts and to effectuate the MAHA Strategy's mission "to ensure that chemicals and other exposures do not interact together to pose a threat to the health of our children."[52] We hope that the EPA will act expeditiously to save Christmas for our children.

Sincerely,

J.W. Glass
EPA Policy Specialist
Center for Biological Diversity

Katie Huffling, DNP, RN, CNM, FAAN,
Executive Director,
Alliance of Nurses for Healthy Environment's (ANHE)

[49] 40 C.F.R. § 154.1.
[50] 40 C.F.R. § 154.7(6).
[51] 40 C.F.R. § 154.34.
[52] MAHA Strategy at 2.