

Dear Senator,

PCBs, or polychlorinated biphenyls, are a group of manufactured organic chemicals that were widely used in building materials, transformers, plastics, and ballasts from 1929 until they were banned by the federal government in 1979.

More than 300 school buildings now in use in Vermont were constructed before 1980, meaning some quantity of PCBs could still be present in these schools. PCBs in school air contribute significantly to overall PCB exposure.

According to Vermont Department of Health Commissioner Dr. Mark Levine, PCBs represent a serious threat to public health. Exposure has been linked to reproductive and developmental disorders, negative effects on the immune system and nervous system, and various forms of cancer.

Two years ago, Vermont legislators passed sensible legislation requiring schools to be tested for PCBs. This testing program is now underway. The results of the testing will allow policymakers to gain a better understanding of the scope of the problem statewide, and provide an opportunity to address potentially dangerous exposures immediately.

The undersigned organizations support the PCB testing program currently underway and urge the Senate to allow it to be completed.

We understand that the House of Representatives passed a bill (H.486) in March that would put a stop to the school testing program while a task force made up of legislators and interested stakeholders considers the broader needs of Vermont school buildings. We oppose this proposal to pause the PCB testing.

In matters of environmental or public health decision-making like this, we generally look to the Precautionary Principle as a guideline. A common definition of the Precautionary Principle is as follows: "When an activity raises threats of harm to human health or the environment, precautionary measures should be taken even if some cause and effect relationships are not fully established scientifically."

While the threat to public health associated with PCBs has now been well established for decades, the danger of PCBs in indoor air, and specifically indoor air in schools, is becoming increasingly clear. A precautionary approach would mean, at a minimum, starting by getting an accurate assessment of the scope of the PCB problem in Vermont schools.

Precautionary measures might also include evaluating different ways of mitigating exposure if PCBs are found, and providing effective ways to inform and engage the public in the process.

We understand that if dangerous levels of PCBs are found in a school, difficult decisions will have to be made in order to prevent children, teachers, and other school personnel from being exposed. We are very willing to work with the stakeholders to seek remediation plans that will work for school systems regarding timelines and strategies. **But stopping the tests now will do nothing to make schools safer. It will just prevent us from gathering the information**

we need to understand potential risks, and identify steps we can take to better protect children and school staff. That makes no sense.

The testing is already happening in Vermont schools. Putting the program on hold for an indefinite period could waste time and resources while allowing potential threats to go undetected. It would also create a system of fundamental unfairness in the state where some parents have learned that their child's school is safe from PCBs while others are left to wonder.

Please allow the state's comprehensive PCB testing program to finish.

Thank you for your consideration,

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Paul Burns, *Executive Director*
Vermont Public Interest Research Group

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