

SUPPLEMENTAL COMMENTS OF THE AMERICAN ZINC ASSOCIATION ON  
THE DRAFT “TAKING STOCK A SPECIAL REPORT ON TOXIC CHEMICALS  
AND CHILDREN’S HEALTH IN NORTH AMERICA”

The American Zinc Association (“AZA”) submits these brief supplemental comments on the above-referenced draft (“Draft”) as a result of developments subsequent to the filing of AZA’s initial comments, to expand on a point made in AZA’s earlier, more-extensive comments.

The Draft (at 2) states that it “is one of the planned activities (activity 3.2) described in the CEC’s *Cooperative Agenda for Children’s Health and the Environment*” (“Agenda”). Looking at the Agenda, however, shows that the Draft was part of a larger item 3 entitled

**“3. EFFECTS OF EXPOSURE TO TOXIC SUBSTANCES INCLUDING  
PESTICIDES**

Exposures to toxic substances, including pesticides, have been linked to causes of childhood death, illness and hospitalization. Council Resolution 00-10 directed the CEC and its member countries to focus on the effects of exposure to toxic substances as a priority for cooperative action to protect children from environmental threats.” (at 15).

Council Resolution 00-10, similarly, is specific in directing the CEC Secretariat to “focus...on...the effects of exposure to other toxic substances.” And, the Draft (ibid.) acknowledges that the Agenda “has an initial focus on...the effects of exposure to...other toxic chemicals.”

As AZA stated in its previous comments,

“Curiously, despite the fact that zinc (and its compounds) are number one on the Draft’s suspected neurotoxicant list, and number two on the known or suspected developmental toxicant list, nowhere in the Draft is any example (if one existed) of zinc’s adverse health effects on children ever mentioned.” (n. 6).

So, while the Council Resolution and the Agenda itself directed that the Draft focus on “effects of exposure,” the Draft is utterly silent on effects of exposure to zinc, the number-one and number-two listed toxicant, in derogation of the stated purpose of the Draft.<sup>1</sup>

The Draft, then, is simply not what was ordered, and should not--and need not--be allowed to substitute for what the Council concluded was needed. Had the Draft been as intended and directed, a study of “effects of exposure,” zinc would not be involved in this process at all. Again, the Draft can’t be fixed to comport with its purpose; it must be scrapped.

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<sup>1</sup> The Draft (at vi) is careful to caution that “PRTR data are releases and transfers of chemicals, and do not necessarily reflect exposures to the public of these chemicals.”

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