

August 21, 2026

Comment to the UNEP Global Framework on Chemicals Secretariat - Supporting the Proposal
Nominating Chemicals Management Issues of Special Concern for Children's Health

The undersigned environmental, health, and community nonprofit, nongovernmental organizations endorse [this IoC proposal](#) as essential to close serious and urgent gaps in protecting children's health from toxic chemicals and the harm they can cause. The global hub and home that this proposal would provide for work on children's health and chemicals would advance vital research, monitoring, public awareness, and positive policy actions that can save lives, strengthen health protection from the start, and advance lifelong well-being.

The public supports stronger government action to ensure a healthy start and future for all children. Valuable collaboration on this issue has occurred within some regions and countries including the United States, but this has not yet led to environmental health protection communities can count on. Scientific evidence and increasing incidence of illness and other health conditions in childhood and early adulthood show a strong need to prevent early chemical exposure, including during pregnancy, infancy, childhood, and adolescence, and to better protect against cancer and other chronic and acute illnesses and health conditions (including endocrine disruption, teratogenic, mutagenic, neurotoxic, reproductive, developmental effects and more).

Children are uniquely susceptible to hazardous chemicals and pollutants, as the proposed IoC recognizes. It is essential to coordinate action against environmental contaminants specifically to prevent and reduce children's exposure and harm. Children intake more environmental contaminants for their body weight, leading to higher doses of exposure, and are still developing organ systems detrimentally affected by harmful chemicals. Prenatal and early childhood chemical exposures, including through air and other pollution pathways, contribute to serious childhood morbidity and mortality and other health conditions throughout life in communities around the world.ⁱ

There is a strong need to ensure children's health is not just sidelined but is a guiding metric and goalpost in setting standards and safeguards for human health – with future regulation necessary to protect children's health specifically. Designing environmental health safeguards with children's health in mind would make vital progress toward the goals of the Global Framework and health protection for all, and would help end the cycle of injustice in communities facing the worst impacts over time from pollution and chemical exposure.

Yet, most U.S. governmental efforts have been isolated or siloed, and have rarely centered children's health in policy design or translated important scientific research into health protection. This has led to preventable chemical exposure during pregnancy, infancy, childhood, and adolescence and insufficient regulations and other policies, and has fueled generational harm, particularly in the most exposed communities and populations.

Although it has received advice from independent scientific experts, the U.S. Environmental Protection Agency has often failed to implement the recommendations of the [Children's Health Protection Advisory Committee](#) on the need to strengthen protection for children's health from cumulative risks and impacts from chemicals in air, water, and other exposure pathways, including during extreme weather events. See the [NGO CHPAC 2025 Comment](#). The [President's Task Force on Environmental Health Risks and Safety Risks to Children](#) has subcommittees on chemical exposures, lead, asthma, and children in emergencies and disasters such as hurricanes,

floods, wildfires, extreme heat and cold, earthquakes and more, but has rarely turned that coordination into actual protection for children's health. The current federal government [pays lip service](#) to protecting children's health [while doing the opposite](#) – dismantling science and agency programs as well as air, water, waste, and chemical safety protections, without even recognizing the impacts on children's health.

The IoC and workplan proposal would boost progress and advance efforts to protect children's health and ensure this becomes a core benchmark under the Global Framework on Chemicals. The proposal would facilitate much-needed coordination focused on understanding, preventing, and reducing children's and early developmental exposure to chemicals across the board, including chemicals like lead, pesticides, mercury, ethylene oxide, PFAS, and chemical mixtures, such as chemicals in plastics.

Please accept and begin to implement this proposal at the conference in November to help ensure that we can make new progress globally, regionally, and locally on children's health as central to environmental health, so that current and all future generations of children and communities can finally be free from harm caused by preventable toxic chemical exposure.

Thank you for your time and consideration of this proposal. For questions or additional information please contact Earthjustice – Emma Cheuse, echeuse@earthjustice.org and Michelle Mabson, mmabson@earthjustice.org – or any undersigned organization.

Sincerely,

Earthjustice
Beyond Pesticides
Breathe Project
California Communities Against Toxics
California Safe Schools
Center for Environmental Health
Church Women United in New York State
Climate Action Campaign at Humboldt UU
Fellowship
Common Ground Rising
Comunidades Organizando el Poder y la
Acción Latina (COPAL)
Doctors and Scientists Against Wood Smoke
Pollution
Don't Waste Arizona
Environmental Defence Canada
Green Science Policy Institute
Healthy Babies Bright Futures

Kentucky Resources Council
Long Term Print
Newburgh Clean Water Project
North American Climate, Conservation and
Environment (NACCE)
Occupational Knowledge International
Santa Cruz Climate Action Network
SEE (Social Eco Education)
Seneca Lake Guardian
Texas Environmental Justice Advocacy
Services
The Last Beach Cleanup
Tri-Valley Communities Against a
Radioactive Environment (CAREs)
Union of Concerned Scientists
Utah Physicians for a Healthy Environment
Zero Waste San Diego

ⁱ See sources cited in [the IoC proposal](#) and also, e.g., Aithal, SS, Sachdeva, I & Kurmi, OP, Air quality and respiratory health in children, *Breathe*, vol. 19, no. 2, 230040 (2023), <https://dx.doi.org/10.1183/20734735.0040-2023>; Brumberg HL, Karr CJ, *et al.*, *Am. Acad. of Pediatrics, Council on Environmental Health, Ambient Air Pollution: Health Hazards to Children, Pediatrics*, 147(6) (2021), e2021051484, <https://publications.aap.org/pediatrics/article/147/6/e2021051484/180283>.