August 1, 2019

Virginia Niehaus
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Raleigh, NC 27699-1931

Attn: Commission for Public Health Members

RE: Child Care Sanitation Rules/Lead Exposure

Thank you for the opportunity to submit comments in response to the proposed change to a child care sanitation rule that will significantly reduce exposure to lead for some of the youngest and most vulnerable children in our state. The NC Pediatric Society (NCPeds) is dedicated to promoting the physical, mental and social well-being of infants, children, adolescents and young adults. NCPeds supports the adoption of this rule which would protect thousands of babies and children from lead exposure in child care drinking and food prep water. Additionally, requiring cost-effective mitigation where elevated lead water levels are found will have the added benefit of getting rid of other harmful toxicants such as copper and chlorine by-products.

In North Carolina, public health officials have been working for more than 30 years to eliminate childhood lead poisoning—and have come very close to doing so. Childhood blood lead levels have dropped dramatically population-wide. Unfortunately, some pockets of high exposure remain. Ending lead exposure in drinking and food prep water is an important step to move us toward the goal of no lead exposure for our state’s young children. The proposed amendment is an important step forward.

NCPeds represents more than 2000 pediatricians and other child health professionals across NC. Ensuring that every young child can grow and learn in a healthy and safe learning environment is central to our mission of promoting child health. This proposal would reduce exposure of 230,000 babies and young children from being lead poisoned by drinking and food prep water in their child care center.

Young children are especially at risk of harm from lead. Babies and young children’s smaller body mass and developing neurological and other critical systems mean that they are at particular risk from lead exposure in terms of brain and other organ development. There is no known safe level of lead exposure for a child. Even at the lowest levels of exposure, lead can reduce IQ and harm children’s ability to concentrate and focus in school. These effects are permanent and can affect a child’s education, health outcomes, and long-term earning potential.

The proposed child care sanitation rule is a strong example of a preventative approach to lead exposure. The following requirements included in the proposed rule will help ensure that it is effective in protecting children from potential lead in child care drinking and food prep water:
Testing for lead in drinking and food prep water every three years: Lead levels in water can fluctuate over time. Changes in water source or chemistry can cause leaching of lead from pipes into water, increasing water lead levels. This is what led to the Flint water crisis. Additionally, unforeseen plumbing problems such as a dirty aerator or a partial clog, can release lead from pipes into drinking and food prep water. Finally, improper maintenance of filters by child care operators can decrease the effectiveness of mitigation measures taken to prevent lead exposure.

Testing all buildings despite age: Buildings constructed after the 1986 Lead Ban may still pose a significant risk of lead contamination in drinking and food prep water. The ban, effective as of 1988, defined “lead free” as materials containing less than 8% lead, which allowed lead to remain in pipes that convey drinking water to homes and in fixtures and faucets in homes. An amendment to the Safe Drinking Water Act, effective as of 2014, redefined “lead free” to require faucets and pipes to contain less than 0.25% lead; as such buildings constructed between 1988 and 2014 can still contain plumbing and fixtures with significant lead content. Testing all buildings despite age will ensure that no building poses a considerable risk of lead exposure.

Testing all taps: The concentration of lead in one tap is not indicative of the concentration of lead in all taps in a building. Lead concentration across taps can vary because lead can originate from an individual faucet, a dirty aerator, or a filter that hasn’t been changed. As such, testing all taps is critical to ensure safe child care center drinking and food prep water.

The best way to protect young children from lead exposure is to be proactive about getting rid of lead, rather than waiting for a child to be found with elevated levels in their blood. To do so, we must be willing to get rid of toxic lead in children’s environment. This rule is an important step towards eliminating toxic lead in a child’s environment.

Please approve the adoption of this rule.

Thank you for your consideration.

Sincerely,

[Signature]

Susan Mims, MD, MPH, FAAP, Chapter President
North Carolina Pediatric Society (NCPeds)

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¹ For detailed scientific information about how changes in water chemistry can affects levels of lead found in water see https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5353852/.