Canadian Strategy for Cancer Control

Recommendations to the Parliamentary Committee

Bill C-30

An Act to amend the Canadian Environmental Protection Act, 1999, the Energy Efficiency Act and the Motor Vehicle Fuel Consumption Standards Act (Canada's Clean Air Act)

National Committee on Environmental & Occupational Exposures

(PPAG/CPAC)

February 2007

Introduction

The National Committee on Environmental & Occupational Exposures (NCEOE) welcomes this opportunity to address a number of the proposed important Bill C- 30 amendments to CEPA 1999. Our committee is a key component of the Primary Prevention Action Group of the Canadian Partnership Against Cancer, established to implement the Canadian Strategy for Cancer Control.

Our focus is to reduce cancer risk amongst Canadians exposed to carcinogens in their community and occupational environments through elimination and reductions of exposures whenever feasible. We seek to promote best practices in environmental and public health policy, industry activity, community programming, and legislative initiatives.

Following NCEOE review of best practices on primary prevention in Canada and abroad, we published the committee report and endorsed seven priority recommendations for implementation by stakeholders in Canada. The full report and recommendations can be found at www.cancercontrol.org

The Canadian Environmental Protection Act was identified as one of Canada's best practices concerning the monitoring and control of certain carcinogens in our environment. Several examples where such compounds are targeted for substitution and phase out were cited. In addition, the potential for linking NPRI data to federal, provincial, municipal, and community prevention programs were noted. However, significant gaps in best practice were also noted, leading to important recommendations for strengthening CEPA concerning its approach in particular to IARC 1, 2A, and targeted 2B human carcinogens.

We have welcomed the commitment of Members of Parliament to environmental protection, and the clear link between controlling greenhouse gas pollution and other toxic pollutants, all of which can pose significant risk to the health of Canadians. However, the Clean Air Act (Bill C-30) does not provide adequate means to address health concerns due to carcinogen exposure. It is not in our mandate to address GHG emissions directly, so we will limit our comments to other pollutants of concern, which Bill C-30 also seeks to address. The legislative committee convened to study C-30 has an important opportunity to strengthen CEPA 1999 and to effectively address Canadians' exposure to carcinogens in their environment.

Part 1 Amendments to CEPA 1999

Definitions: Air Pollution

We are concerned that the new definition of air pollution is far more restrictive than the broader definition in the current Act. Everything listed in the new definition could be (and should be) included under the generic terms in the current legislation, and for certainty could be added in list format. *We recommend that classified human carcinogens also be included in such a list, and specifically targeted throughout the revised legislation.*

10 (3) a) Equivalent Provisions

It is important that all Canadians receive equal protection from exposure to carcinogens in their environment. The proposed changes exempting jurisdictions with provisions which may have equivalent effect will weaken the present equivalency provisions calling for *equal regulatory provisions.*

56. (1)Requirements for Pollution Prevention Plans

The proposed revision is unclear and may result in a restricted requirement for prevention plans only if a listed air pollutant or GHG is present. We recommend that such plans be required for scheduled toxic substances, *and that IARC 1, 2A and selected 2B carcinogens be placed on this Schedule.* These carcinogenic substances are inherently toxic through a number of different mechanisms. Emerging research in gene-environment interaction, epigenetic mechanisms, and multiple exposures to multiple carcinogens indicates the need for precautionary pollution prevention programming as sound environmental and public health policy.

72.2 Paragraphs 93(1) Exercise of Authority (Regulations)

We recommend that human carcinogens be specifically targeted through a

published list of concentration limits allowed, pursuant to clause (n).

Canada has agreed to and will be shortly implementing the harmonized international classification system (GHS) with a carcinogen classification cut-off of 0.1%. We recommend that there be a review of scheduled carcinogens to determine which should be restricted to use only below this cut off value, and to which classes of products this would apply. The principle of mandatory substitution of less toxic substances is in place in occupational regulations both federally and in the province of British Columbia. This should be incorporated in both the CEPA preamble and in the section requiring pollution prevention programmes. *All products used with concentrations above the GHS 0.1% cut-off should be addressed through labelling provisions under clauses (o) and (q).* We further recommend that there be required disclosure, along with use of the international hazard symbol and agreed upon hazard phrase (GHS), so that the Canadian public is clearly informed of the presence of a human carcinogen. Similar restrictions and warning provisions are standard practice in other jurisdictions, including the EU and California in the United States.

Schedule 1 and Schedule 3 Part 1 & 2 : Asbestos

We have supported the World Health Organization policy calling on member countries to immediately phase out the use, sale, and export of all forms of asbestos. WHO estimates that globally, up to 100,000 persons annually die from asbestos exposures. We note that CEPA Schedule 1 currently lists asbestos, but only lists crocidolite in Schedule 3 Part 2 Notification or Consent (Export Control List).

Both IARC and WHO have reviewed the extensive evidence documenting the human carcinogenicity of all forms of asbestos. Asbestos related cancer (primarily mesotheliomas are currently compensated) account for over 70% of all cancer fatalities recorded by Workers Compensation Boards across Canada, and these cancers account for approximately 35% of all annual work related fatalities in Canada. Asbestos use in developing countries is a significant source of toxic air pollution for those using this substance, as also noted by

WHO. *We support the reference in Bill C-30 to international air pollutants and the importance of controlling them. It is Canada's particular responsibility to help eliminate the burden of asbestos caused cancers and disease worldwide. We recommend that asbestos be placed in Part 1 of Schedule 3, and restricted from export.*

103.1 Release of Air Pollutants

There is evidence of increased risk of lung cancer with increases in fine particulate matter exposure. In fact PM 2.5 and ozone have been listed as CEPA toxic and are slated for a reduced standard by 2010. However, the standard remains too high, equal to the higher exposure levels in a Harvard study of six urban areas in the United States.

There needs to be a review of the best practices in such standards, and a scheduled nation wide air quality standard adopted that addresses a number of air pollutants which are also carcinogens. This includes fine particulate PM 2.5; PAH compounds associated with diesel emissions, and heavy metals such as lead , mercury and cadmium.

Toxics Use Reduction (Emissions) Agency

Our Best Practices Report noted the impressive results of the Massachusetts Toxic Use Reduction Act and Institute, since its inception in 1989. *We recommended that government investigate and implement a similar resource for Canadians. An independent monitoring agency, combined with resources to promote the substitution of less toxic inputs into our industrial processes and hence the environment is needed.*

This would assist small, medium, and large industry, including governments at all levels in pollution prevention planning. Funding for this agency should be generated both through a fee based system and through enforcement mechanisms of CEPA once revised.

Information Disclosure

We recommend that there be areas where pollution monitoring is stepped up to ensure capture of data for targeted schedule 1 substances. Community exposure profiles should be available annually for all urban areas and selected rural areas where pollution data indicates levels of exposure to carcinogens / toxic substances. This information should be disseminated through accessible public portals, and be linked to pollution prevention programming. Much lower reporting thresholds are required, and we recommend that the lower thresholds proposed in the State of Massachusetts toxic use reduction legislation be adopted.

Larry Stoffman, Chair
National Committee on Environmental & Occupational Exposures PPAG/CPAC

DRAFT—FOR DISCUSSION PURPOSES ONLY
March 15, 2007

GREAT LAKES—ST. LAWRENCE RIVER BASIN WATER CONSERVATION AND EFFICIENCY INITIATIVE

BACKGROUND

The Great Lakes Governors and Premiers signed the Great Lakes—St. Lawrence River Basin Sustainable Water Resources Agreement (Agreement) on December 13, 2005. This Agreement created the Great Lakes-St. Lawrence River Water Resources Regional Body (Regional Body), comprising the Governors and Premiers, to further coordinate implementation of its terms.

Pursuant to Article 304(1) of the Agreement, the Regional Body will adopt regional water conservation and efficiency objectives by December 13, 2007. These objectives are intended to be broad, overarching concepts which will provide context for further State and Provincial action that will be more specific in nature.

The process for developing the regional water conservation and efficiency objectives is intended to be open and transparent. Regional stakeholders have been asked to provide technical information, make recommendations and foster communication with interested organizations and individuals. Representatives of Tribes and First Nations have also been engaged and asked to share their experience and traditional knowledge. Public input will also be sought.

Once finalized and adopted by the Regional Body, the regional objectives will then be used to inform the development of individual State and Provincial water conservation and efficiency goals and objectives. These goals and objectives will in turn shape State and Provincial water conservation programs. The Agreement also provides direction to ensure that the States and Provinces, along with the Regional Body, undertake periodic reviews of their water conservation programs. Additionally, the regional objectives, as well as reports prepared by each State and Province on their programs, will be reviewed by the Regional Body every five years.

INTRODUCTION

Efficient and responsible water use is a cornerstone of sound water management policy, whether the resource is considered abundant or scarce. Efficient use and conservation of our water resources can:

- Ensure equitable access to and long-term availability of water;
- Protect public health and enhance quality of life;
- Support healthy aquatic ecosystems;
- Minimize costs related to water infrastructure;
- Preserve social and cultural heritage;
- Prevent or minimize conflicts among water users;
- Enhance economic viability and competitiveness of the region;
- Improve the ability to manage an uncertain future and growing demand for water; and,
- Demonstrate that the region's citizens are prudent stewards of the resource.

These Basin-wide goals and objectives are intended to complement other water conservation and efficiency efforts consistent with water quality objectives. They will accelerate intergovernmental and other partnerships including, for example, partnerships with Basin Tribes and First Nations to build a greater understanding and consideration of traditional knowledge and

practices. Whether accomplished through voluntary, mandatory, or a combination of measures, to be successful, these goals and objectives need to be broadly supported.

GOALS—As stated in the Great Lakes-St. Lawrence River Basin Sustainable Water Resources Agreement

1. Ensuring improvement of the waters and water dependent natural resources;
2. Protecting and restoring the hydrologic and ecosystem integrity of the Basin;
3. Retaining the quantity of surface water and groundwater in the Basin;
4. Ensuring sustainable use of waters of the Basin; and,
5. Promoting the efficiency of use and reducing losses and waste of water.

DRAFT OBJECTIVES

-Guide programs toward long-term sustainable water use.

- Use adaptive programs that are goal-based, accountable and measurable.
- Develop and implement programs openly and collaboratively.
- Prepare and maintain long-term water demand forecasts.
- Develop long-term strategies that incorporate water conservation and efficient water use.
- Review and build upon existing planning efforts.

-Adopt and implement supply and demand management to promote efficient use and conservation of water resources.

- Maximize water use efficiency and minimize waste of water.
- Promote innovative technology for water reuse as appropriate.
- Conserve and manage existing water supplies to prevent or delay the demand for and development of additional supplies.
- Provide incentives to encourage efficient water use.
- Include water conservation and efficiency in the review of proposed new or increased uses as appropriate.
- Promote investment in and maintenance of efficient water infrastructure and green infrastructure.

-Improve monitoring and standardize data reporting among State and Provincial water conservation and efficiency programs.

- Improve the measurement and evaluation of water conservation and water use efficiency.
- Encourage measures to account for water loss.
- Track program progress and effectiveness.

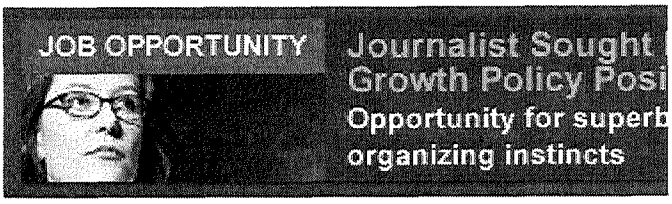
-Develop science, technology and research.

- Foster the identification and sharing of innovative management practices and state of the art technologies.
- Encourage research, development and implementation of water use and efficiency technologies.
- Seek a greater understanding of traditional knowledge and practices of Basin First Nations and Tribes

-Develop education programs and information sharing for all water users.

- Ensure equitable public access to water conservation and efficiency tools and information.
- Inform, educate and increase awareness regarding water use, conservation and efficiency and the importance of water.
- Share conservation and efficiency experiences, including successes and lessons learned across the Basin.
- Enhance and contribute to regional information sharing.
- Encourage and increase training opportunities in collaboration with professional or other organizations.
- Ensure that conservation programs are transparent and that information is readily available.
- Aid in the development and dissemination of sector-based best management practices and results achieved.
- Seek opportunities for the sharing of traditional knowledge and practices of Basin First Nations and Tribes.

MICHIGAN LAND USE INSTITUTE
SMART GROWTH WORKS



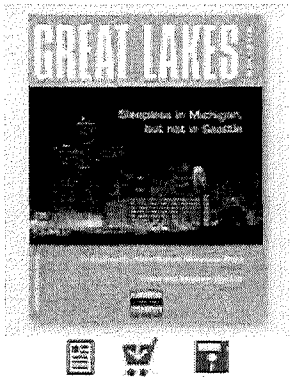
- About
- Thriving Communities
- Prosperous Farms
- Transportation Choices
- Refreshing Spaces
- Local Action
- Join

Home : Search Results

CONTENTS

+ About MLUI
+ Resources
+ Publications
Special Reports
Fact Sheets
Special Online Series
Smart Growth Store

Great Lakes Bulletin



Admin Home | Logout | Email Page | Contact | View Cart | Shop | Check out | Login | Register XML

Page list: **1** | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 52 | 53 | 54 | 55 | 56

Records 1 to 25 of 1397 Next Last

	Article	ArticleDate	Author 1	Author 2	Key Issue	Sub Key	Proj
1:	A Link to Farming's Future	3/14/2007	Diane Conners		Prosperous Farms	Farmland Protection	Loca Stat Prog
2:	New Faces, New Futures	3/9/2007	Julie Hay		Prosperous Farms	Entrepreneurial Agriculture	Busi Dev
3:	Clean Lakes Mean Good Jobs	3/1/2007	Andy Guy		Refreshing Spaces	Water	Sma Busi Opp
4:	Everglades to Great Lakes: Think Two Shades of Green	2/28/2007	Andy Guy		Refreshing Spaces	Water	Sma Busi Opp
5:	Traverse City Promises to Cool It	2/22/2007	Carolyn Kelly		Thriving Communities	Community Design	Mas Plan
6:	Petoskey Looks beyond Bypass	2/20/2007	Julie Hay		Transportation Choices	Roads/Highways	
7:	Northport Sewer Dispute's Hard	2/5/2007	Julie Hay		Thriving Communities	Community Design	Infra

	Lessons					
8:	Leaders Brief Levin on Regional Visioning	1/29/2007		Thriving Communities	Community Design	Reg
9:	Agency Endorses Grand Rapids Streetcars	1/26/2007	Andy Guy	Transportation Choices	Public Transit	Bus/ Syst
10:	What Will Go Where?	1/11/2007	Carolyn Kelly	Thriving Communities	Community Design	Mas Plan
11:	Banking on Shoreline Restoration	1/3/2007	Andy Guy	Refreshing Spaces	Water	Sma Busi Opp
12:	Udall: A Letter to My Grandchildren, Pt 3	12/31/2006	Stewart L. Udall	Refreshing Spaces	Land	Ren Ene
13:	Udall: A Letter to My Grandchildren, Pt 2	12/28/2006	Stewart L. Udall	Refreshing Spaces	Water	
14:	Udall: A Letter to My Grandchildren, Pt 1	12/22/2006	Stewart L. Udall	Refreshing Spaces	Water	Sma Busi Opp
15:	Murphy, Black Caucus Chair, Looks at Proposal 2	12/19/2006	Charlene Crowell	Thriving Communities	Community Design	Rac
16:	Sleepless in Michigan, not Seattle	12/15/2006	Keith Schneider	Thriving Communities	Community Design	Reg
17:	For Successful Planning, It's the More, the Merrier	12/11/2006	Carolyn Kelly	Thriving Communities	Community Design	Reg
18:	Way Better than Summer	12/2/2006	Diane Conners	Prosperous Farms	Entrepreneurial Agriculture	Farm Cafe

	School!				
19:	The Little Trolley that Could...and Did	11/29/2006	Andy Guy	Transportation Choices	Public Transit	Bus/ Syst
20:	Another Great Day for Smart Growth	11/22/2006	Keith Schneider	Transportation Choices	Public Transit	Bus/ Syst
21:	Will State Leaders Heed Election Message?	11/22/2006	Keith Schneider	Transportation Choices	Public Transit	Bus/ Syst
22:	A Promise Kept for Kalamazoo	11/16/2006	Keith Schneider	Thriving Communities	Community Innovations	
23:	Traverse City Eyes Cooling Agreement	11/12/2006	Carolyn Kelly	Refreshing Spaces	Land	Ren Ene
24:	Restore a River, Boost a Tax Base	11/2/2006	Andy Guy	Refreshing Spaces	Water	Lake
25:	Quick! Confiscate the Butter!	10/30/2006	Patty Cantrell	Prosperous Farms	Entrepreneurial Agriculture	Loca

Next Last

Records 1 to 25 of 1397

2007 Michigan Land Use Institute.
The images, marks, and text herein are the exclusive property of the Michigan Land Use Institute. All Rights Reserved.
148 E. Front St., Suite 301, Traverse City, MI 49684-5725 Phone: 231-941-6584 Fax: 231-929-0937 webinfo@mlui.org