

January 31, 2013

Nina Campbell
Energy Efficiency and Environment Division
International Energy Agency
9 rue de la Fédération
Paris 75739 Cedex 15 France

Via regular mail and email: Nina.CAMPBELL@iea.org

Dear Ms Campbell,

RE: IEA Capturing the Multiple Benefits of Energy Efficiency - Invitation for health impacts studies

I was forwarded your email of January 4, 2013 sent to Mary Todorow of the Advocacy Centre for Tenants Ontario (ACTO), concerning the above-noted invitation. Like ACTO, the Canadian Environmental Law Association (CELA) is a publicly-funded legal aid clinic and non-governmental organization in Ontario, Canada. CELA specializes in environmental law and has worked extensively with ACTO and other organizations in the Low Income Energy Network (LIEN) <www.lowincomeenergy.ca> to address energy poverty and affordability issues. CELA also works extensively on matters related to children's health often in close collaboration with the Canadian Partnership for Children's Health and Environment (CPCHE) <www.healthyenvironmentforkids.ca>.

Recently, these two areas of our work were combined in our "Healthy Retrofits" project, an effort led by CELA and done in collaboration with CPCHE.
<http://www.cela.ca/collections/pollution/healthy-retrofits>

The need for this project arose from our experience with clients, evidence in the literature, and results of outreach work, that hazardous exposures to toxic substances during renovations and energy retrofit activities can result from lack of awareness. We saw an opportunity to improve on the already valuable work in the energy efficiency sector that is addressing both climate change and energy affordability by adding an emphasis on ensuring that buildings are safer and healthier. It has been our experience that the "green" building movement, including energy retrofits, does not always ensure that buildings are also healthy. However, it can and it should.

Our Healthy Retrofits project began in 2009 and was highly successful. External funding for the project ended last year although activity continues. The project occurred in three phases including preparation of a baseline report, outreach materials, and liaison with stakeholders to promote uptake/adoption of the project outputs.

The work included a detailed review of potential hazards to children's health from energy retrofit or renovation activities. As part of this research, we did a literature/website scan of relevant guidance and policy, to assess the degree of attention to indoor environmental health issues in energy efficiency programs (focusing on provincial programs in Ontario and federal programs). We surveyed energy efficiency consultants and others to gauge their existing knowledge and practice. We also conducted key informant interviews with a range of stakeholders (government officials, homeowner/landlord/tenant associations, public interest groups, retailers, construction/renovation industry) on current practices, gaps, opportunities, barriers, etc.

The project report included the following key findings

- There is a Canada-wide, linear correlation between age of housing and socio-economic status such that as the age of housing rises, socio-economic status lowers.
- Older housing is most likely to contain hazardous materials that can be disturbed by renovations such as lead, asbestos, and PCBs, and is often most in need of energy efficiency retrofits.
- Exposures of concern arise from "legacy chemicals" (in paint, insulation, flooring, etc.), from tightening the building envelope, and from the choice of new materials.
- There is a lack of awareness and training among energy auditors and in the building trades about potential health risks.
- There is strong interest in better integration of energy and health issues and the report makes recommendations for program design, training, education/outreach and policy.

The report was released March, 2011 and received extensive media attention across Canada and worldwide. It is available on-line at www.cela.ca and www.healthyenvironmentforkids.ca and attached here.

Phase Two of the project drew upon what we learned in Phase One and in consultation with stakeholders, we identified potential target audiences, key intermediaries, and core messages for raising awareness of potential sources of toxic chemical exposure and safe renovation/retrofit practices. We drafted outreach materials incorporating extensive peer review and published and disseminated them in multiple languages. They are also available on-line and attached here.

In Phase Three, we continued to publicize the project findings, recommendations, and outputs at relevant conferences and events, encouraging uptake of core messages and outreach materials into relevant governmental programming (e.g., energy efficiency incentive programs, municipal departments responsible for building permits, etc.). We continue to liaise with relevant players to encourage adoption of project messages and outputs, as well as encouraging diverse policy improvements.

Finally, an ongoing series of projects within CPCHE is addressing the related topic of radon remediation. Again in collaboration with CPCHE, CELA has a small contract with Health Canada to explore the potential of piloting a training/employment project for the installation of radon mitigation systems in low-income housing. There is obvious potential for synergy with energy efficiency measures (e.g., basement sealing and insulation) and/or other indoor environmental health co-benefits (e.g. reducing pest intrusion, addressing moisture issues, etc.).

This exploration of radon mitigation solutions at the community level is part of a broader suite of outreach activities on radon that CPCHE is embarking on, with Health Canada support.

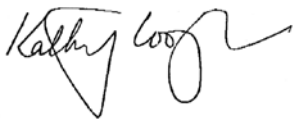
All of which is in reply to your email and invitation. I reviewed the materials that you sent to Mary, including the cover email, the prospectus, and the Insights Paper.

My impression was as follows. While multiple benefits are noted in detail, are obviously extremely important, and are worthy of greater study, the discussion of health benefits contains no mention of the child health risks we raised in our report and that are the focus of the outreach materials. Hence, we thought it would be useful to your work to pass along our report as well as note the availability of the related outreach work.

I hasten to add that I don't want to dismiss or deny the many other benefits, including health benefits. Rather, this response is to encourage the uptake of our analysis so that the "win-win" scenario remains of ensuring awareness of potential health risks during renovations and energy efficiency retrofits so they can be scrupulously avoided.

All of which is respectfully submitted,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Kathleen Cooper
Senior Researcher

c.c.

Erica Phipps, Partnership Director, Canadian Partnership for Children's Health and Environment
Mary Todorow, Advocacy Centre for Tenants Ontario
Zeenat Bhanji, Coordinator, Low Income Energy Network

Enclosures

Healthy Retrofits: The Case for Better Integration of Children's Environmental Health Protection into Energy Efficiency Programs

Renovate Right – How to make sure a home repair or energy upgrade is child healthy (in 7 languages)