



David  
Suzuki  
Foundation

SOLUTIONS ARE IN OUR NATURE



CANADIAN ENVIRONMENTAL LAW ASSOCIATION  
*L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT*

July 12, 2012

The Hon. Leona Aglukkaq, P.C., M.P.  
Minister of Health  
Health Canada  
Brooke Claxton Building, Tunney's Pasture  
Postal Locator: 0906C  
Ottawa, ON K1A 0K9

Dear Minister Aglukkaq,

Congratulations on the first anniversary of the *Canada Consumer Product Safety Act* (CCPSA)!

Section 67 of this Act requires the Minister to “establish a committee to provide him or her with advice on matters in connection with the administration of this Act, including the labelling of consumer products.” We are concerned that this committee has yet to be formed, one year after the Act entered into force.

When Parliament was studying the CCSPA, our organizations emphasized the importance of strengthening ingredient disclosure and hazard labeling requirements for toxic substances in consumer products. Currently, regulations under the *Hazardous Products Act* require hazard labels to warn consumers of acute dangers from chemicals and containers. However, there is no parallel requirement for warning labels to indicate chronic health hazards or environmental hazard.

International standards are stronger. California’s *Safe Drinking Water and Toxic Enforcement Act of 1986* (Proposition 65) requires notices on consumer products known to cause cancer, birth defects or other reproductive harm. The European Union’s Regulation on *Regulation No. 1272/2008* on classification, labelling and packaging of substances and mixtures (“CLP”) requires warning symbols on chemicals and chemical mixtures expected to cause chronic adverse effects on human health or the environment.

The Parliamentary Committee that studied the CCSPA assured us that these issues would be considered by the advisory committee to be convened under Section 67. We therefore urge you to convene this committee without further delay, ensure that it includes broad stakeholder representation, and direct it to make recommendations on strengthening Canada’s ingredient disclosure and hazard labelling requirements within a time-limited mandate.

The purpose of the *Canada Consumer Product Safety Act* -- “to protect the public by addressing or preventing dangers to human health or safety that are posed by consumer products in Canada” -- explicitly includes addressing or preventing “chronic adverse effect on human health” related to exposure to consumer products (Section 2, interpretation of “danger to human health or safety”).

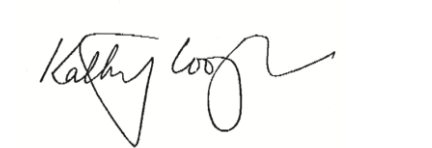
Convening the advisory committee mandated under Section 67 is an important step towards fulfilling this purpose.

We look forward to your response and would welcome the opportunity to discuss this with you further.

Sincerely,



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cc. *Mr. André Bellavance, Health Critic for the Bloc québécois*  
*Ms. Libby Davies, Health Critic for the NDP*  
*Hon. Hedy Fry, Health Critic for the Liberal Party*  
*Ms. Elizabeth May, Leader of the Green Party*