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## Letter to Environment and Climate Change Canada – Support for Including EDCs in the UN GHS

**The Honourable Julie Dabrusin**  
Minister of Environment and Climate Change  
Environment and Climate Change Canada  
Ottawa, Canada

**The Honourable Marjorie Michel**  
Minister of Health  
Health Canada  
Ottawa, Canada

**Subject: Canada’s essential role in advancing the inclusion of endocrine-disrupting chemicals (EDCs) under the UN Globally Harmonized System (GHS)**

Dear Minister Dabrusin and Minister Michel,

We are writing to respectfully urge the Government of Canada to actively support the development and inclusion of hazard classes for endocrine-disrupting chemicals (EDCs) within the United Nations Globally Harmonized System of Classification and Labelling of Chemicals (GHS). Canada has long been a constructive voice within the UN Sub-Committee of Experts on the GHS (UN SCEGHS), and your leadership is crucial now to help close a widely recognized global gap in chemical hazard communication.

### **The scientific and regulatory gap**

EDCs pose unique, long-term hazards that are insufficiently covered by current GHS provisions. This has been confirmed by:

- The OECD ad hoc expert group mandated by the UN SCEGHS[1], whose gap analysis shows that existing GHS categories do not adequately capture endocrine-mediated effects, especially for non-EATS pathways[2];
- The OECD’s recently published Report on the State of the Science to Address Endocrine Disruptors under the Globally Harmonised System of Classification and Labelling further strengthens the case for action.[3] The report confirms that existing GHS hazard classes are generally inadequate for reliably identifying and communicating endocrine-disrupting properties affecting human health and the environment. It highlights persistent scientific and

- regulatory gaps, especially for endocrine-mediated effects beyond reproductive toxicity, and emphasizes the need to update and expand test methods in line with current science.
- The European Union’s recent introduction of formal hazard classes for endocrine disruption under the CLP Regulation;
  - UNECE documents presented at the 45th–47th GHS sessions, all acknowledging that endocrine disruption is not effectively recognized under today’s GHS, resulting in incomplete risk communication for workers, communities (particularly disadvantaged and under resourced communities who may be at higher risk to the impacts of EDCs), and the environment.[4]

The EU CLP Regulation has demonstrated that developing scientifically robust hazard classes for endocrine disruptors is technically feasible and implementable. UNEP’s forthcoming *State of the Science* update on EDCs (2026) is expected to further strengthen the evidence base. These findings provide robust, up-to-date scientific support for establishing dedicated GHS hazard classes for endocrine disruptors.

## Canada’s pivotal position in the UN GHS process

EDCs are currently discussed across three levels of the GHS structure:

1. **UN SCEGHS formal sessions**, where governments take consensus decisions;
2. **The EU-coordinated PHI-IWG[5]**, where scientific and structural options are developed;
3. **The OECD**, which performs the scientific assessment and method review.

Canada is among the few countries—along with the EU, US, and UK—that consistently participate in and intervene on the issue. Most other regions remain silent or are absent from GHS meetings. We are encouraged and pleased that Canada is taking an active role in these global discussions, which enhance Canada’s influence and responsibility to address the current gap. However, since all GHS amendments require consensus, progress can slow if leading countries do not send clear, unified signals.

The September 2025 PHI-IWG discussions highlighted that developing EDC hazard classes remains a priority, pilot studies are expected to provide new data in 2026, and there is an urgent need for coordinated advocacy. A joint appeal by Canadian and European NGOs was also considered to build momentum.

## Why Canada’s support is essential

Canada has made significant progress in aligning with GHS revisions through WHMIS under the Hazardous Products Act and Regulations [6], [7]. Although Canada does not currently incorporate environmental hazard classes into WHMIS, the country’s position within the UN GHS process remains highly influential. Supporting EDC hazard classes would:

- strengthen chemical safety for Canadian workers by filling a recognized information gap;
- ensure Canadian stakeholders (industry, workers (including those disadvantaged or seasonal workers, consumers) benefit from globally consistent hazard information;
- align Canada with the international scientific assessment performed by OECD;
- maintain Canada's reputation as a science-based, precautionary leader;
- help prevent regulatory divergence as major trading partners, including the EU, expand their hazard frameworks.

## **The need for clearer Canadian engagement and transparent consultations**

Canadian NGOs, workers' representatives, and scientific experts reported barriers to participation in the most recent GHS meeting consultations, which were not publicly visible. Given Canada's leadership role, we respectfully encourage your departments to:

- Ensure or commit to regular, transparent national consultations ahead of every UN SCEGHS meeting;
- Establish and support Canadian NGOs and scientific experts to submit written input;
- Facilitate nominations for participation in PHI-IWG sessions when EDCs or related hazard classes are discussed.
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Such engagement would ensure that Canada's positions reflect the best available science and the concerns of Canadians.

## **What we respectfully urge Canada to do**

We kindly request that Canada:

- Formally support the development of new EDC hazard classes under the UN GHS, aligning with OECD findings and the EU CLP model;
- Actively advocate during UN SCEGHS and PHI-IWG meetings for a clear roadmap, including timelines linked to the OECD pilot studies;
- Encourage broader participation from non-OECD regions to help build the global consensus needed for adoption;
- Publicly communicate Canada's position to demonstrate leadership and transparency;
- Reinstate open national consultations before GHS sessions and proactively notify civil society and scientific stakeholders.

## **Conclusion**

The inclusion of EDCs in the UN GHS is scientifically justified, technically feasible, and vital for effective global chemical safety. Canada is uniquely positioned to advance this effort. With your

leadership, Canada can help ensure that endocrine disruptors are reliably identified and communicated internationally—protecting workers, communities, and ecosystems while enhancing global harmonization.

We would welcome the opportunity to discuss this further or to provide additional scientific evidence and policy analysis.

Sincerely,

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## Annex

### 1. Endocrine disruption presents unique hazards not captured by current GHS categories

OECD's ad hoc expert group has concluded that existing GHS provisions do not adequately capture endocrine-mediated adverse effects, particularly:

- effects occurring at low doses;
- non-monotonic dose responses;
- long-term developmental, metabolic, or immune impacts;
- effects mediated through non-EATS pathways.[8]

These characteristics require explicit hazard-class recognition to ensure accurate communication to workers and downstream users.

### 2. Canadian biomonitoring and environmental data show population-level exposure to suspected EDCs

Health Canada's *Canadian Health Measures Survey* and *Canadian Total Diet Study* have documented exposure to several endocrine-active substances—including phthalates, PFAS, bisphenols, and flame retardants—across all age groups, including children and pregnant women.[9] Communicating endocrine hazards clearly at the SDS and product-label level would improve employer awareness and align with Canada's commitment to protecting vulnerable populations.

### **3. Canada's regulatory system already recognizes endocrine disruption as a significant concern**

Canada has acted on endocrine disruptors through:

- bans/restrictions of BPA in baby bottles (2010), phthalate in toys (through Canadian Consumer Product Safety Act) (2010)
- assessment and regulatory measures of endocrine-active flame retardants under CEPA (2012);
- regulatory measures on specific PFAS chemicals (2012), many of which have endocrine-active properties.[10]
- Current requirements under CEPA support research on EDCs and this work continues to as part of its Chemicals Management Plan. [11]

Supporting an EDC hazard class under GHS is consistent with these domestic policies.

### **4. Alignment with international partners will reduce regulatory divergence**

The EU CLP now includes formal EDC hazard classes (Categories 1 and 2 for human health and environment). Without global harmonization under the GHS, divergence between Canadian WHMIS classifications and EU CLP labels is expected to increase, creating challenges for manufacturers, importers, and workers who rely on SDSs for hazard communication.

### **5. Worker protection requires clearer hazard communication**

WHMIS applies to Canadian workplaces, where early recognition of endocrine hazards is essential. Workers are frequently the first exposed to hazardous substances. Including EDC criteria in GHS would enhance SDS clarity, support substitution policies, and reduce the long-term burden of endocrine-related disease.

### **6. Scientific feasibility is established**

The EU's implementation of EDC hazard categories, together with OECD's review of testing methods, demonstrates that scientifically robust criteria are ready for GHS consideration. The forthcoming UNEP/WHO global scientific update (2026) is expected to strengthen the case further.

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[1] OECD. 2023. Progress Report and Gap Analysis: Ad Hoc Expert Group on Endocrine Disruptors. UN SCEGHS/45/INF.20. United Nations Sub-Committee of Experts on the Globally Harmonized System of Classification and Labelling of Chemicals.  
<https://unece.org/sites/default/files/2023-11/UN-SCEGHS-45-INF20e.pdf>

[2] **endocrine-disrupting mechanisms that do *not* involve the four classical endocrine pathways**, which are:

- E = Estrogen
- A = Androgen
- T = Thyroid
- S = Steroidogenesis (production of steroid hormones)

Many endocrine-disrupting chemicals act through “non-EATS” pathways—that is, mechanisms outside the classical estrogen, androgen, thyroid, and steroidogenesis systems. Substances such as PFAS, BPA analogues (BPF, BPS), organophosphate flame retardants, dioxin-like PCBs, phthalates, and certain pesticides disrupt endocrine function through metabolic, neuroendocrine, retinoic acid, vitamin D, or immune signalling pathways. These mechanisms are increasingly linked to diabetes, obesity, neurodevelopmental disorders, immune dysfunction, and developmental abnormalities. Because current GHS testing and classification frameworks focus primarily on EATS pathways, endocrine disruptors acting through non-EATS mechanisms are often missed, reinforcing the need for a dedicated hazard class under the GHS.

[3]

[https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/12/report-on-the-science-to-address-endocrine-disrupters-under-the-globally-harmonised-system-of-classification-and-labelling\\_7b663d1a/9aa7cd81-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/12/report-on-the-state-of-the-science-to-address-endocrine-disrupters-under-the-globally-harmonised-system-of-classification-and-labelling_7b663d1a/9aa7cd81-en.pdf)

[4] UNECE. 2023–2024. Working Papers for the 45th–47th Sessions of the UN Sub-Committee of Experts on the GHS, including ST/SG/AC.10/C.4/2024/20 and INF.21. General document portal: <https://unece.org/about-ghs>

[5] The EU-coordinated PHI-IWG is the informal working group on Potential Hazard Issues and their presentation in GHS. This group is coordinated by the European Union and works under the auspices of the UN Sub-Committee of Experts on the GHS (SCEGHS)

[6]

<https://www.canada.ca/en/health-canada/services/environmental-workplace-health/occupational-health-safety/workplace-hazardous-materials-information-system/roles-responsibilities-whmis.html>

[7] Canada. Health Canada. 2015. Hazardous Products Regulations (SOR/2015-17), WHMIS 2015. Guidance:

<https://www.canada.ca/en/health-canada/services/environmental-workplace-health/occupational-health-safety/workplace-hazardous-materials-information-system/supplier-hazard-communication-requirements-whmis/guidance.html>

[8] OECD. 2024. Potential Hazard Classes: Endocrine Disruptors. Report of the OECD Ad Hoc Group on Potential Hazard Classes. Submitted to UN SCEGHS.

<https://unece.org/transport/documents/2024/11/report-oecd-ad-hoc-group-potential-hazard-classes-endocrine-disrupters>

[9] Health Canada. 2023. Canadian Health Measures Survey (CHMS), Cycles 1–7: Biomonitoring Highlights, and Total Diet Study. CHMS summary:

<https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/environmental-contaminants/biomonitoring-content-summary-canadian-health-measures-survey.html>

[10] Prohibition of Certain Toxic Substances Regulations, 2012 (SOR/2012-285).

<https://laws-lois.justice.gc.ca/eng/regulations/SOR-2012-285/index.html>

[11] Canadian Environmental Protection Act, 1999 (S.C. 1999, c. 33)

