



2 October 2017

The Right Honourable Justin Trudeau, P.C., M.P., Prime Minister of Canada
Ottawa, Canada

Re: Call for improvements to the *Canadian Environmental Protection Act (CEPA)*

Dear Prime Minister,

We write today as the **Canadian Partnership for Children's Health and Environment (CPCHE)** to urge the Government of Canada to seize this once-in-a-generation opportunity to make vital improvements to the *Canadian Environmental Protection Act (CEPA)*. Your leadership is essential to ensure that all children in Canada grow up in indoor and outdoor environments that enrich, rather than jeopardize, their life-long health and well-being.

CPCHE is a national collaboration of organizations with overlapping missions that have been working together for more than a decade to improve children's environmental health in Canada (www.healthyenvironmentforkids.ca). Our aim is to increase awareness, mobilize knowledge and catalyze action on children's environmental health issues, with a specific focus on preventing/reducing exposures to toxic chemicals and pollutants during the vulnerable stages of fetal and child development. CPCHE's rigorous adherence to facts and scientific evidence has positioned it as a respected source of information on children's environmental health issues.

We welcome the analysis and recommendations in the June 2017 report of the House of Commons Standing Committee on the Environment and Sustainable Development, and the calls to action in the Scientists4CEPA petition being submitted to you this week. As a partnership devoted to the protection of the health of Canada's children from the harmful and often permanent effects of exposure to toxic substances, we urge the Government of Canada to amend CEPA in order to:

- 1) **Shift the burden of proof**, such that producers/importers of potentially hazardous substances have to provide government evaluators with sufficient data to support a claim of safe use or acceptable risk in order to gain or retain access to the Canadian marketplace.
- 2) **Require chemical assessments to consider aggregate, cumulative, synergistic and low-level effects**, in light of the myriad substances to which people, including children, are regularly exposed. Assessments should encompass potential subtle/sub-clinical, latent and intergenerational effects as well as potential alteration of brain or organ system functioning.
- 3) **Establish more robust criteria for defining persistence and bioaccumulation**, including the concept of "quasi-persistence" used to describe substances to which we are continuously exposed and that are therefore continuously present in body tissues even if the body is capable of breaking them down.
- 4) **Require that chemicals be tested for potential effects on fetal/child development**, including neurodevelopment.
- 5) **Address workplace hazards** when assessing potential exposures during preconception, fetal and child development. This work should include assessment of direct and "take home" exposures, and

take into account mounting evidence that some exposures even prior to conception, for fathers as well as mothers, may affect reproductive outcomes.

- 6) **Adopt the substitution principle** whereby hazardous substances are actively replaced with less hazardous alternatives, and alternatives are duly assessed for potential harm.
- 7) **Require labelling of all toxic substances in consumer products**, in support of the public's right to know. This should include all substances associated with cancer, reproductive, endocrine and/or developmental toxicity.
- 8) **Take timely action when scientific evidence indicates a substance may pose a potential health threat**, in concordance with the principle of precaution,
- 9) **Require immediate and comprehensive action on substances that have been declared toxic** under CEPA.
- 10) **Mandate protections in the Act for vulnerable populations** who bear disproportionate exposures and/or risks from toxic chemicals and pollution, including children (from conception through fetal development, childhood and adolescence), Indigenous peoples, people living on low income and who are otherwise marginalized, those living with multiple chemical sensitivities and other chronic conditions, and seniors.
- 11) **Recognize the right to a healthy environment.**

The alarming and ever-expanding scientific evidence of the harm caused to children's developing bodies, brains and lifelong prospects by the plethora of toxic substances and pollutants to which we are all routinely exposed demands urgent and decisive action. We urge you to exercise your leadership in ensuring a proactive, robust and vigorously enforced CEPA, for the benefit of Canada's peoples and our environments, now and into the future.

Yours sincerely,



Erica W. Phipps
Executive Director, CPCHE

Canadian Partnership for Children's Health and Environment (CPCHE) – Partner Organizations



Canadian Partnership for Children's Health and Environment (CPCHE) – Affiliate Organizations

College of Family Physicians of Canada (CFPC) <http://cfpc.ca>
Grey Bruce Health Unit (GBHU) www.publichealthgreybruce.on.ca
Health and Environment Analysis Lab (HEALab) at the University of Ottawa
Ontario College of Family Physicians (OCFP) www.ocfp.on.ca
Region of Peel Public Health www.peelregion.ca/health
Thunder Bay District Health Unit (TBDHU) www.tbdhu.com