May 27th, 2009

Joy Smith, MP
Chair, Standing Committee on Health
c/o Georges Etoka, Clerk
Standing Committee on Health
House of Commons
Room 5-80
131 Queen Street
Ottawa, ON K1A 0A6

Dear Mrs. Smith,

Re: Health Committee Study of Bill C-6, An Act Respecting the Safety of Consumer Products

The Canadian Partnership for Children’s Health and Environment (CPCHE) is an innovative and multi-sectoral collaboration of medical, environmental, public health and child care organizations, formed in 2001. We are very pleased to note that the Canadian Paediatric Society will soon become a CPCHE partner.

Our main focus is to reduce and prevent fetal and childhood exposures to toxic substances by promoting advancements in research, policy and practice. Our research indicates that consumer products are a significant source of the toxic substances of concern for children, in utero and throughout childhood.

We have developed numerous educational resources for service providers, decision-makers and the general public that are being used across the country, including in a successful workshop series, now in its fourth year, funded by the Public Health Agency of Canada, Health Canada, the Ontario Trillium Foundation and other funders.

Building upon our educational work, during 2007 we conducted a year-long National Policy Consultation that engaged multi-stakeholder participants in a cross-Canada dialogue about children’s health and environment. Participants included federal and provincial government officials and politicians, numerous scientific and policy experts from Canada and the United States, representatives from the chemical and mining industries as well as environmental, health and child care non-governmental organizations.
Using the results of the National Policy Consultation workshop series, CPCHE partners developed *First Steps in Lifelong Health – A Vision and Strategy for Children’s Health and Environment in Canada*. Among this report’s recommendations is a major focus on consumer product safety. A summary is included in the attached media release from December of 2008.

We enclose multiple copies of our Vision and Strategy, in both official languages, and ask that it, and a copy of this letter and attachments, be provided to the members of the Health committee to assist in your deliberations on Bill C-6.

For the sake of assisting the committee with orientation to those areas of the *Vision and Strategy* pertinent to Bill C-6, we would like to direct your attention to specific recommendations.

In our *Call for Action* (pages 4 and 5) we set out a series of recommendations for immediate action, most of which are relevant to consumer product safety. Specifically, we recommend a comprehensive consumer product safety regulatory scheme with six specific sub-recommendations related to:

1. improved labelling (see also Box 21, page 25);
2. product recall powers;
3. banning all non-essential uses of lead and mercury in consumer products (see also Box 17, page 22 and Box 22, page 26);
4. banning the sale of children’s products containing phthalates following the lead of Europe and the United States (see also Box 20, page 24);
5. banning the manufacture, import, use and sale of all polybrominated diphenyl ethers (PBDEs) and PBDE-containing products (see also Box 19, page 23 and Box 22, page 26); and
6. the need to significantly reduce exposures to volatile organic compounds from consumer products by requiring manufacturers to avoid their use or substitute with safer alternatives.

The Vision and Strategy recommendations concerning Law and Policy (pages 17-26) address areas of relevance to Bill C-6 including the need to:

1. Codify the precautionary principle in all federal legislation concerning toxic substances (page 19).
2. Adopt the substitution principle whereby hazardous substances are actively replaced with less hazardous alternatives (page 19 and Box 15, page 20).
3. Ensure extended producer responsibility for products such that full life-cycle analysis occur within a context of reducing the use and release of toxic substances as a mandatory part of decisions about product components, their production, use, packaging, disposal and/or recovery (page 19 and Box 15, page 20).
5. Adopt and publicize a list of chemicals of concern in consumer products, requiring disclosure of their use via improved labelling and ensuring product recall powers (Recommendation 5, page 25).

We have been following your Committee deliberations with great interest. The Committee appears to be particularly taken with the issue of improving product labelling provisions in the Bill. We wish to strongly support the Committee’s efforts in enhancing Bill C-6 with provisions for labelling of products that contain chemicals associated with chronic toxicity.
On June 2nd, our Coordinating Committee Chair, Kathleen Cooper, Senior Researcher with the Canadian Environmental Law Association, will present to your committee and be able to speak to recommendations made in our Vision and Strategy. Thank you for the opportunity to place our recommendations before your committee.

Erin W. Phipps
Partnership Director, on behalf of the CPCHE Partners
MEDIA RELEASE

Federal Government Action Needed Now to Protect Children from Hazardous Chemicals in Consumer Products

16 December 2008: A partnership of eleven environmental, public health, medical and child care groups is calling for improvements in the federal government’s approach to regulating chemicals in consumer products. Improved regulation is one of three key areas identified in First Steps in Lifelong Health: A Vision and Strategy for Children’s Health and Environment in Canada. The Vision and Strategy builds upon eight years of research and consultation by the Canadian Partnership for Children’s Health and Environment (CPCHE).

“Products that we bring into our homes– from toys to furniture to cleaning products and electronics, from pesticides to air fresheners – too often contain substances that do or could disrupt the normal development of the brain and other organs of a fetus or child.” says Dr. Lynn Marshall, a physician with the Environmental Health Clinic at Women’s College Hospital. “Children are more vulnerable than adults to environmental contaminants because their bodies are undergoing rapid development and their behaviours – such as crawling on the floor and putting things in their mouths – put them in contact with contaminants found in the home, including many that are in ordinary house dust.”

Research shows that many of those contaminants come from consumer products. The polybrominated flame retardants found in TVs and computers, the phthalates found in soft vinyl toys and many personal care products, and bisphenol A (BPA), the plastic additive found in the lining of food cans and in many rigid plastic containers, are among the chemicals targeted by CPCHE for urgent action.

CPCHE is recommending that the federal government improve its regulation of chemicals and secure the legislative power to issue mandatory recalls of products when problems are discovered. The partners are also calling on the government to empower parents with information via labeling and other means. “It is unacceptable that children continue to be put at risk from lead found in common consumer products, such as toys, key chains and costume jewelry,” says Kathleen Cooper, senior researcher with the Canadian Environmental Law Association. “We have known for decades about the serious risk that lead poses to the brain and nervous system, yet the federal government still allows products containing lead to be marketed. If we can’t get it right for lead, what actions can we expect with all the other chemicals that scientists are increasingly linking to health effects?”

There is much to learn about the risks posed by thousands of chemicals that are in commerce today – most of which have not been tested for their potential to adversely affect the developing fetus and child. “But lack of full scientific certainty is no excuse for inaction.” says Barbara McElgunn, Health Policy Advisor with the Learning Disabilities Association of Canada. “When it comes to the health and development of children, it is better to be safe than sorry. CPCHE is calling on the federal government to take precautionary action to reduce children’s exposures to chemicals that are known or reasonably suspected to pose health risks.” CPCHE is also calling
for more research on how chronic exposure to environmental contaminants may be contributing to worrisome trends in child health in Canada and other industrialized countries, including rising rates of asthma, learning disabilities and other developmental challenges.

CPCHE’s *First Steps in Lifelong Health* is a comprehensive blueprint for protecting children’s environmental health in Canada. “The list is long. There is much to do. But the public is increasingly aware of the need to reduce children’s exposures to toxic chemicals, and governments are starting to respond.” says Erica Phipps, Partnership Director for CPCHE. “The CPCHE partners look forward to working with governments and other stakeholders to build on that momentum.”

*First Steps in Lifelong Health: A Vision and Strategy for Children’s Health and Environment* is available on the CPCHE website, in English and French, at [www.healthyenvironmentforkids.ca](http://www.healthyenvironmentforkids.ca)

CPCHE will present *First Steps in Lifelong Health* to the media in a **press conference at 10:00 AM EST, Tuesday, 16 December**, at the Ontario College of Family Physicians, 357 Bay Street (mezzanine), Toronto. Refreshments provided.

To mark the occasion of the release of *First Steps in Lifelong Health*, CPCHE and Pollution Probe will host an **Evening Public Forum on Protecting Our Children from Toxic Chemicals in the Environment and in Consumer Products, Tuesday, 16 December 2008, 7-9 pm**, at the Marriott Toronto Downtown Eaton Centre, 525 Bay Street (Yonge and Dundas subway), Toronto. Distinguished speakers include the Ontario Minister of the Environment, the Director General of Health Canada’s Consumer Product Safety Program, and the Editor-in-Chief of *Today’s Parent* magazine (see agenda, attached). Free admission; no registration required.

Please direct media inquiries to:

Erica Phipps, Partnership Director, CPCHE
Available on 15-16 December at (416) 926-1907 x252 or (613) 858-4787 (cell)
Office: (819) 458-3750 Erica@healthyenvironmentforkids.ca

The following CPCHE Partners are available for comment:

Kathleen Cooper, Senior Researcher, Canadian Environmental Law Association
Tel: (705) 341-2488 (cell); (416) 960-2284, ext. 221 kcooper@cela.ca

Dr. Lynn Marshall, Medical Education Liaison, Environmental Health Clinic, Women’s College Hospital; President & Chair of the Board, Environmental Health Institute of Canada; and Alternate Chair, Environmental Health Committee, Ontario College of Family Physicians
Tel: (905) 845-3462 Lynn.marshall@utoronto.ca

Bob Oliver, Executive Director, Pollution Probe
Tel: (416) 926-1907 ext. 237 boliver@pollutionprobe.org