



November 15, 2018

SENT VIA EMAIL

David Morin
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Healthy Environments and Consumer Safety Branch
Health Canada, Government of Canada
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Re. Defining vulnerable populations - A first step towards a policy framework on vulnerable populations - Consultation document

Dear Mr. Morin,

This submission outlines Ecojustice's and Environmental Defence's support of the Government of Canada's proposal for defining vulnerable populations within the context of chemicals management. Our comments also include three recommendations for improving the proposed approach.

Our groups generally support the proposed approach for defining vulnerable populations and appreciate the work of the department to take these initial steps in response to the recommendations of the House of Commons Standing Committee on Environment and Sustainable Development (ENVI) for strengthening CEPA as well as the long-standing concerns of environmental, health and civil society groups about gaps within the federal government's legislative and policy frameworks for assessing and managing the risks of chemicals.

Here are our recommendations for improving the proposed approach:

- 1) With respect to the definition of vulnerable populations in the consultation document, we would like to underscore the importance of recognizing that some vulnerable groups may be at greater risk than the general population of experiencing adverse health effects from exposure to *a single chemical substance*. While the current proposal captures the intent of the definition proposed by Ecojustice, Environment defence and the Chemistry Industry Association of Canada Industry in a joint letter submitted to the



Minister of Environment and Climate Change Canada on May 2, 2018, we recommend that the proposed definition explicitly recognizes that greater risk may result from exposure to one or more substances for some vulnerable populations.

Thus, we recommend the definition is modified to as follows:

*“a group of individuals within the general Canadian population who, due to either greater susceptibility and/or exposure, may be at greater risk than the general population of experiencing adverse health effects from exposure to **one or more chemical substances**”.*

- 2) With regard to identifying “individuals with greater exposures” on page 4, we recommend that women are added as an example of “individuals who may have increased exposure to chemicals due to their usage patterns”. For example, it is common knowledge that women on a daily basis use many more cosmetics and personal care products, and may hence be exposed to greater levels and a greater number of (or combination of) substances through these products.
- 3) We urge Health Canada and Environment and Climate Change Canada to move forward with preparing amendments to modernize CEPA to consider vulnerable populations in risk assessment and management according to the ENVI recommendations. Legislative amendments to CEPA would strengthen the departments’ mandates and efforts to protect vulnerable populations from harmful chemicals and implement more effectively the proposed definition and policy under consideration.

Thank you for the opportunity to comment on this proposal and for your consideration of our comments.

Sincerely,

Muhannad Malas, Toxics Program Manager
Environmental Defence Canada

Dr. Elaine MacDonald,
Program Director, Healthy Communities
Ecojustice