

## SUBMISSION TO THE ENVIRONMENTAL ASSESMENT CONSULTATION

On behalf of Breast Cancer Action Manitoba

September 15, 2017

At a time when health care costs are spiralling out of control and ever increasing numbers of people are being diagnosed with chronic diseases such as cancer, diabetes and kidney disease, it is of utmost importance that the Government of Canada update the Canadian Environmental Assessment Act, the Canadian Environmental Protection Act and the Pest Control Products Act.

People are being exposed to hundreds of toxic chemicals every day in their homes, workplaces and communities. They are in our water, soil and air. They are in processed foods, personal care products, cosmetics, cleaning supplies and furniture, to name a few sources. Many of these chemicals are listed as known, probable or possible carcinogens by the International Agency for Research on Cancer (IARC), (the research arm of the World Health Organization) [www.iarc.fr/](http://www.iarc.fr/) and the American Cancer Society. The Canadian Cancer Society [www.cancer.ca/](http://www.cancer.ca/) and the American Cancer Society [www.cancer.org/](http://www.cancer.org/) have sections on prevention on their websites which include information on toxic chemicals.

In the last twenty years scientific studies have identified many chemicals which negatively affect human health. They have been linked to cancer, diabetes, obesity, autism, infertility and other chronic diseases. Vulnerable populations such as pregnant women, fetuses, children of all ages, the elderly and those with compromised immune systems are at elevated risk of developing these diseases. Even low doses of toxic chemicals are sufficient to cause adverse health effects to people in these categories. Total elimination of these toxic substances is a necessary step to a prevention strategy.

The present process of assessing chemicals cannot keep pace with the number of new chemicals being identified as harmful to human health and/or the environment. With over 80,000 chemicals used in agriculture, industry and manufactured products the process required to assess them for toxicity is long and arduous. Those chemicals which are earmarked for regulation require additional consultation which further increases the amount of time before the "safe" amount of this particular chemical can be determined. The problem lies in the fact that the amount determined to be safe for the general population is not applicable to the vulnerable populations listed above. This "safe" amount is based on a single dose. It does not take into account that the timing of the exposure, for example at the pre-natal stage, the frequency of exposure, and the intensity of the exposure. It also does not address how this chemical interacts with other chemicals, nor that it accumulates in tissues of the human body. Many of these chemicals are fat soluble and are stored in fatty tissues of

the body such as the breast. They have been detected in the umbilical cords of newborn babies and also in breast milk.

Prevention strategies must take into account the scientific evidence of the causes of diseases such as cancer in order to decrease the number of people diagnosed with these chronic diseases. **More funding for research on prevention is a necessary component of a prevention strategy.**

**Canada needs to shift to least-toxic approaches.** Today, we are exposed to harmful chemicals and radiation until the damages accumulate, studies are conducted and lengthy debates eventually conclude that new actions are merited, and after further delays modest steps may gradually cut back exposures. These may affect us immediately, or slowly accumulate and team up gradually to cause cancers and other conditions with common contributors.

Despite a wealth of evidence linking environmental exposures to detrimental health outcomes out-dated scientific frameworks delay actions, resulting in yet more damage to health and the environment. Persistent substances leave a toxic legacy for our children and grandchildren.

**Substances interfering with hormone actions alter development**, from the moment of conception throughout life, pre-disposing us to cancers and other conditions.

The *Canadian Environmental Assessment Act*, *Canadian Environmental Protection Act* and the *Pest Control Products Act* must be upgraded to:

1. **Recognize our right to a healthy environment.**
2. **Require up-front comprehensive assessments**, with the precautionary principle to protect even the most vulnerable.
3. **Require least-toxic approaches.** Professionals use "best practices." It is not ok to permit all that is "good enough" until there is no doubt of harms occurring to the environment and peoples, and *then* to substitute with similar substances.
4. **Deal with complex, combined effects of chemicals and radiation**, including endocrine disruption.
5. **Be nimble**, requiring reassessments when new concerns arise.
6. **Be transparent** - make public the detailed data for assessments and from monitoring.
7. **Restore protections to all navigable waterways** - protection of waterways and shores is important for clean water and air, as well as ecosystem health and protection from flooding.
8. **Act on the substantive work of the EA Panel and Parliamentary Committee on CEPA.**

**This is important for NAFTA too!** The marketplace will welcome Canadian products if we earn the reputation as trusted leaders in health, safety and environmental footprint, while polluters will claim that Canada is interfering with business as usual.

The Government of Canada has a responsibility to protect the health of all Canadians. The results of scientific studies need to be taken into account when assessing chemicals for their effect on human health and/or the environment. They must also follow the lead of other jurisdictions such as the European Union and the United Kingdom and ban toxic chemicals which have been proven to cause chronic diseases.

Pouring more money into research into new and more effective treatments for chronic diseases may prolong lives but will not result in a reduction of the number of cases being diagnosed. Funding for research into prevention should receive amounts of funding equal to that granted for studies focusing on new treatments.

Sending representatives to International Conferences to learn about prevention strategies developed in in other countries would greatly assist in the development of a Canadian Prevention Strategy.

Recent Conferences include:

- In June 2016 IARC held a scientific conference **Global Cancer: Occurrences, Causes and Avenues to Prevention** [iarc@50conference2016](#). It was attended by over 1000 people.
- In 2011 there was an International Conference on **Environmental and Occupational Determinants of Cancer: Interventions for Primary Prevention** which resulted in the Asturias Declaration [www.who.int/phe/news/events/international\\_conference/Call\\_for\\_action\\_en.pdf](#) :a call to action on environmental and occupational cancer prevention.

Upcoming Conferences:

In 2018 the 4th World Congress Conference **Cancer and Prevention Methods** will take place in Valencia, Spain. [www.worldcancerconference.com/](#) Who will be representing Canada at this conference?

It takes healthy people and a healthy environment to have a healthy economy.

I urge the Government of Canada to take into account the recommendations of the Standing Committee on Environment and Sustainable Development and of the submissions to the Environmental Protection Consultation to make decisions which protect both the health of Canadians and of the environment when updating **The Canadian Environmental Assessment Act, Canadian Environmental Protection Act and the Pest Control Products Act** .

Submitted by Louise Schoenherr, President, Breast Cancer Action Manitoba

Contact information: Phone: 204-257-2649 Email: kschoenh@mymts.net

