

The Canadian Environment Network has provided a sample letter about the evaluation of chemical substances going on right now as part of the Federal Government's Chemicals Management Plan. This evaluation is a series of screening assessments called the Industry Challenge. If you want to make your letter more effective, please consider taking a few moments to edit and personalize it.

It would be extremely valuable to include a personal story of why you are concerned about the regulation of chemicals and the lack of information that the public has on cancer-causing agents in the environment and in the products that we use.

For example:

- "I have seen many products recalled in the past few years. It makes me wonder why we don't know more about their contents before they are put on the market."
- "I have seen too many of my colleagues develop cancer. As a blue-collar worker, I am concerned that the government's screening assessments are not taking occupational exposures into account."
- "I have seen a number of products that I have been exposed to for years, suddenly have their use restricted. I am concerned about all of these chemicals on the market that haven't been tested and might be harmful to my family's health."
- "With so many products on the market, as a parent, I am concerned about the combined effects of chemicals. Why are chemicals evaluated one by one, my daughter doesn't live in a laboratory, she is exposed to a variety of chemicals. Could there be cumulative or synergistic effects?"

Dear _____,

I am writing to you today because I am concerned about the current screening assessments that are being done on chemicals.

Over the past few years, I have heard a lot about product recalls. I have also heard a lot about the different hazardous chemicals present in the products I use. The problem is – that until recently, the Government had not assessed the 4,300 'existing chemicals' which were on the market before 1994. I think that screening assessments of those chemicals is a step in the right direction. However, I have a number of concerns.

The current screening assessments do not adequately consider vulnerable populations like children, blue-collar workers, pregnant women and indigenous populations. Relevant hazard information from epidemiological studies for vulnerable populations should be taken into account. Children, workers and first nations people should not be used as guinea pigs.

Chemical substances that are known, suspected or potential carcinogens should be designated "toxic" under the Canadian Environmental Protection Act, CEPA 1999. Steps also should be taken to ban the use and importation of toxic substances, in all forms,

including products containing carcinogens. The same policy hold for substances that are known or suspected genotoxins, mutagens, reproductive and developmental toxins.

I am extremely concerned that the government is not designating chemicals as “toxic” under CEPA 1999. The fact that some chemicals that are high-hazard are not being designated as toxic, results in no government action being taken to manage these chemicals, and results in no research or testing of substitutes. This just doesn’t seem right, particularly for high-hazard substances.

Further, the trend towards issuing “Significant New Activity Provisions” (SNAC) to high-hazard low-volume substances seems unfair to those who are exposed to these products. Low volume doesn’t mean no volume. “Significant New Activity Provisions” (SNAC) were designed for substances that are new to Canada, but the government is using these provisions for existing substances on the Domestic Substances List. All chemicals need to be evaluated and when substances receive SNAC provisions but are not designated as CEPA “toxic”, the health of Canadians is put at risk.

I believe that we should not risk our health with products that have not been shown to be ‘safe’, instead we need to err on the side of caution. Unfortunately, the current screening assessments have not resulted in precautionary action. The government has a number of pollution prevention tools, which could and should be used, but the government simply has not taken action. Pollution prevention plans for source elimination, identification of safe substitutes and removing inefficiencies in industrial processes – are all pollution prevention tools which are effective. However in the Industry Challenge, very few pollution prevention proposals have been put forward with the exception of those for bisphenol A and TDI. Instead, the government has taken actions which maintain the status quo in the use of substances, or at best, lead to slight reductions in environmental releases.

It is particularly upsetting that very little regulatory action was proposed for the high priority substances that were found to be toxic, with the exception again of bisphenol A. This is unacceptable. The Government can do a much better job at evaluating chemicals and protecting Canadian’s health.

The Government should ensure that substances are evaluated with consideration to real world exposures. When products are found to be carcinogenic, mutagenic or endocrine disrupting, they should be taken off the market. If any cancer-causing substances are present in products, they should be identified with a hazard symbol, so that consumers know more about the precautions that need to be taken when the product is used.

I look forward to hear your views on improving the evaluation of chemicals substances, making precaution and pollution prevention a priority and protecting my family’s health.

Sincerely yours,