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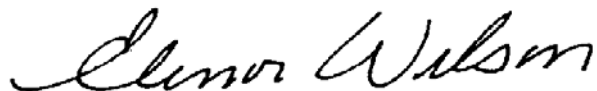
Keli Hogan
Committee Clerk / Greffière de comité
Senate of Canada / Sénat du Canada

The Canadian Public Health Association (CPHA) is pleased to submit our recommended changes on the Canadian Environmental Protection Act 1999 (CEPA) to the Senate Standing Committee On Energy, the Environment, and Natural Resources. In consideration of the fact that CEPA is governed by both the Minister of Environment Canada and Minister of Health, CPHA sees CEPA as providing the key legislation to address the fundamental relationship between health of the environment and health of the public. CPHA has developed its proposed recommendations in light of this relationship.

The Parliamentary Committee has posed a series of questions regarding mercury to help with deliberations on the changes necessary in CEPA. Mercury is a good illustration of the interconnection between human health and the health of the environment, and human activities and human and environmental health. Certainly, this connection within CEPA needs to be maintained, and strengthened to allow for Canada to develop as a leader in sustainable development. If any broad change were contemplated in this regard, the CPHA respectfully submits that the new Public Health Agency of Canada be reflected within CEPA, as its duties pertain to the relationship between human health and the environment.

In the accompanying enclosure, the CPHA offers specific changes to CEPA to improve the act in promoting and protecting the health of the public and environment.

Sincerely



Elinor Wilson
Chief Executive Office
Canadian Public Health Association



Timothy Lambert PhD. MSc.
Volunteer
Canadian Public Health Association

Specific Changes Recommended For CEPA: Summary

Below is a summary of the changes recommended to CEPA. This section is followed by the rationale.

1. Declaration

CPHA recommends the declaration of CEPA be amended to specifically declare: **“The primary purpose of this Act is to contribute to protecting and promoting the health of the environment and public, and contribute to sustainable development through pollution prevention and mitigating the adverse effects of previous human activities.”**

2. Precautionary Principle

CPHA recommends the precautionary principle specifically be defined: **“where there are threats of serious or irreversible damage, to public health or the environment, precautionary measures should be taken to mitigate the harm; lack of full scientific certainty shall not be used to as a reason for postponing cost effective measures to mitigate environmental degradation and protect human health; as a tool of sustainable development, processes, products, and substances must be shown not to pose serious or irreversible damage to human health or the environment.”**

3. There is a need to introduce respect for “environmental justice” as an administrative duty.

CPHA recommends that under the administrative duties of the Government of Canada, that it explicitly indicate respect for environmental justice. CPHA offers the following wording for section 2 of CEPA: **“respect environmental justice in setting national standards and in environmental and public health decision-making, where respecting environmental justice means ensuring that identifiable groups, local communities, or low socioeconomic status, and vulnerable eco-systems, do not face increased health risks because of these characteristics.”**

4. Part 3 - Information Gathering

CPHA recommends a new section under information gathering that states: **a national human health monitoring program of toxic chemicals shall be established, and that the information gathered on human exposure shall be made public.**

CPHA recommends a new clause state: **In respecting environmental justice, the national monitoring program shall specifically include populations where there could be greater exposures than the national average.**

CPHA recommends the following: **The Ministers shall collect and consider the information and scientific assessments of other jurisdictions.**

5. Part 5 – Controlling Toxic Substances

5.1 Virtual Elimination

CPHA recommends that the definition of ‘virtual elimination’ be amended to include a “continuous improvement” clause. The continuous improvement clause would require, in addition to the specified pollution prevention reductions, the comment that: **“facilities are expected to provide plans for continuous improvement on 5 year intervals for reductions in the release of toxic chemicals until such time as the releases are negligible.”**

CPHA recommends that CEPA section 65 (2) specifically reference chemicals for the virtual elimination list that have been found to be carcinogenic (IARC list groups I and II, US EPA NTP), neurotoxic, and have developmental and reproductive effects.

CPHA recommends that the Government of Canada in establishing quantities, in developing guidelines and standards, and in implementing virtual elimination, section 65 (3), use 1 in 1 million cancer health risk, and use child specific uncertainty factors in health risk assessments.

CPHA recommends that section 65 (3) contain the additional clause that: **“precautionary measures should be taken to minimize releases and exposures to as low as practically possible below any established quantities of release or environmental quality guidelines”.**

5.2 Regulations

The CPHA comments at this point, that the CWS are not regulations. The provinces are not “legally bound” to implement the CWS for mercury. **CPHA recommends that section 2(1)(g) standards, section 55.1, add the wording, “legally enforceable standards”.**

CPHA recommends that section 90 (1.1) state: **“the Ministers shall give priority to pollution prevention and remedial and restorative actions”**

Consistent with the precautionary principle, the CPHA recommends that this limitation of the applicability of regulations not be limited to schedule 1. The regulations need to be applicable to any substance on the Domestic Substance List. This change will allow for CEPA regulations to be used for a wide variety of needs like information gathering and capacity building with respect to all toxic chemicals.

CPHA recommends that in developing regulations, the Minister shall: consider regulations of international partners, and ensure that Canada has equal or stricter regulations for governing toxic chemicals.

6. Public Consultation

CPHA recommends that CEPA needs a clear and precise public consultation process to make sure the diversity is heard, and that consensus be developed or a range of acceptable solutions are explicated.

The CPHA recommends that CEPA be amended to specifically mention the “local community” and “non governmental organizations” (NGOs) in the consultation processes.

Specific Changes Necessary To CEPA: Rationale

1. Declaration

CPHA recommends the declaration of CEPA be amended to specifically declare: **“The primary purpose of this Act is to contribute to protecting and promoting the health of the environment and public, and contribute to sustainable development through pollution prevention and mitigating the adverse effects of previous human activities.”**

CPHA’s proposed wording change to the declaration is to strengthen the contribution of CEPA to sustainable development, by adding the need to address human and environmental health risks from past human activities. A significant burden of human and environmental health risks faced by Canadians and the environment are from previous human activities. Mercury serves as a good example of harm caused from previous human activities.

Mercury has been released into the environment for millions of years through natural processes, like volcanoes. However, over the last century, the major source of mercury is from human activities like coal combustion for electricity and other processes like metal smelting. Mercury has contaminated the global environment, and Canada is particularly affected because of our unique geographical position on the earth. Mercury released from different global regions like China deposits in northern regions like Canada. As a result, mercury is of greatest concern to the indigenous populations and the environment in the more northern parts of Canada. Mercury does not break down and thus accumulates in the environment. Mercury released from previous human activities will deposit in Canada for many years to come and will cause adverse effects into the future.

Currently, the declaration of CEPA says: “the primary purpose of the act is to contribute to sustainable development through pollution prevention”.

Pollution prevention, as defined in CEPA, means the use of processes that avoid or minimize the creation of pollutants and reduce the overall risk to the environment and human health. In this regard, CEPA does contribute to addressing the release of mercury from coal fired power plants in Canada amongst other sources. The new Canada Wide Standard (CWS) for reduction of mercury emissions from coal fired power plants is an example of pollution prevention, i.e., the process of producing energy will change as a result of the CWS, reducing – but not eliminating – the release of mercury as an unwanted consequence of coal combustion. Similarly, all of the other CWS for mercury are framed only in terms of pollution prevention.

The committee asked: “In what ways is the act helpful and in what ways does it hinder the protection of human health from mercury exposure?”

Pollution prevention is clearly a helpful aspect of CEPA. However, limited to this, it is also the limitation of CEPA and hinders a full approach to sustainable development

which includes protection of human health and the environment from previous human activities.

With respect to the mercury in the environment from past activities, a key exposure pathway is through fish. Mercury bio-accumulates in fish. Mercury contamination results in more fish advisories than any other contaminant in fish. The human health concerns range from developmental effects, neurological effects, and heart disease. Mammals and other creatures which consume fish also experience increased health risks.

Fish play an integral part in many Canadian's culture and thus the impacts are far reaching beyond immediate "physical health" and impact public health in its broadest sense. Therefore CEPA needs to reflect the broad public and environmental health needs associated with mercury.

There are immense data needs in every aspect of mercury contamination from measurement in various environmental media to understand potential future loadings in eco-systems, measurement of mercury in fish to advise people, measurement of mercury in people's bodies to determine if they are sick, and measurement of health effects to understand problems caused by mercury. CEPA plays a part in all of these data needs.

Mercury typifies the situation for a number of toxic chemicals on the Domestic Substance List (DSL) and present in the Canadian environment. Many chemicals are present in the environment from past industrial activities: lead from paint on floors and yards; PAHs and heavy metals from previous industrial facilities; phthalates from plastic products. All of these toxic chemicals are in need of both pollution prevention and additional measures beyond pollution prevention to address the full range of public health and environmental risks. The development of CEPA to include both future emissions and addressing previous releases will contribute more fully to 'sustainable development'.

The CPHA submits that the change recommended reflects the duties presently within CEPA. The administrative duty of the Government of Canada is to: "(a.1) take preventative and remedial measures to protect and, enhance and restore the environment." The CPHA suggests the declaration and primary purpose of CEPA reflect this duty with respect to the environment and public health.

2. Precautionary Principle

Under the administrative duties, CEPA declares that the Government of Canada: “2.1 (a): exercise its powers in a manner that protects the environment and human health, applies the precautionary principle”.

CPHA recommends that CEPA maintain its grounding in the precautionary principle. In particular, CPHA sees the precautionary principle as a fundamental development in the ethical perspective which guides public health action.

Public health and environmental measures in Canada were initially ground in the principle of prevention. Prevention stems from the basic ethical tenant: do no harm, on the contrary, promote the good as much as possible. Prevention applies to toxic chemicals which are known to cause public and environmental health risks, where there is a reasonable scientific certainty of the health risks. Within CEPA, these are toxic chemicals on Schedule 1.

For example, with respect to lead in gasoline, it was removed from gasoline when it was known to be causing harm to the public. With respect to mercury, we have known since antiquity that mercury causes health problems, and there is an increasing body of evidence that mercury causes harm at levels currently present in our bodies and environment.

In contrast to the principle of prevention, the precautionary principle provides guidance for risks which are uncertain, thus it applies well before full scientific certainty has been reached. However it is clear that the precautionary principle applies when there is scientific evidence of harm and this distinguishes it from action for theoretical or hypothesized risks to consider the other extreme of the spectrum (see Appendix A).

The precautionary principle applies for a large number of toxic chemicals on the Domestic Substances List. Like mercury, a number of substances persist in the environment and bio-accumulate. A number of these chemicals are considered to cause health effects like cancer and adverse neurological effects. It is for these chemicals which the precautionary principle needs to be applied in CEPA.

The precautionary principle is defined in CEPA as: “where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation, and reinforces enforceable pollution prevention approaches”

CPHA recommends that the limitations in this definition of the precautionary principle be addressed at this time. The changes will contribute to clarity in the role CEPA plays in recognizing the interconnection between human health and the environment and in its role as a contribution to sustainable development.

First, the precautionary principle as stated does not reference public health. CPHA recommends that the act clearly state that the precautionary principle will be applied to public health.

Secondly, the precautionary principle should reflect 'precautionary measures' rather than 'preventative measures'. Preventative measures should be applied for CEPA toxics which have known health and environmental risks, and precautionary measures to address health and environmental risks from chemicals for which there exists a degree of uncertainty. This clarity in language will aid the public in understanding the actions been taken by the government, in particular, given the large number of chemicals on the domestic substances list.

Thirdly, as a contribution to sustainable development, the precautionary principle needs to reflect the administrative duty to ensure that processes or products do not cause harm. Introducing this concept into the precautionary principle is consistent with administrative duties present within CEPA, in particular, (2.(1) (k): "assess whether existing substances or those new to Canada are toxic or capable of becoming toxic and assess the risk that such substances pose to the environment and human life and health". The onus must be on those releasing chemicals and products into the environment to prove the safety of their processes and products, not on the public to prove negative health effects. It is the activities which are shown not to cause harm which are contributing to sustainable development.

CPHA recommends the precautionary principle specifically be defined: **"where there are threats of serious or irreversible damage, to public health or the environment, precautionary measures should be taken to mitigate the harm; lack of full scientific certainty shall not be used to as a reason for postponing cost effective measures to mitigate environmental degradation and protect human health; as a tool of sustainable development, processes, products, and substances must be shown not to pose serious or irreversible damage to human health or the environment."**

3. There is a need to introduce respect for “environmental justice” as an administrative duty.

CPHA has written to the Senate Committee on Social Affairs, Science and Technology, urging them to consider the issue of reducing health inequalities in Canada. CEPA can contribute to reducing health inequalities by respecting that the environment is a determinant health. However, at this time, CEPA does not contain reference to environmental justice.

Environmental justice has emerged over the last 25 years in recognition that some groups of people are experiencing increased public and environmental health risks, and lack political power to make changes to address these inequities.

Mercury illustrates the need to consider the principle of environmental justice. Canada is geographically situated such that we experience the deposition of global mercury releases into our environment; the emissions of the United States and China are impacting Canada.

In particular, mercury is depositing and bio-accumulating in Canada’s arctic regions. As a result, the indigenous population and northern ecosystem is experiencing increased health and environmental risks. Mercury typifies many other pollutants such as PCBs and chlorinated organic compounds, which have been released in many other parts of the world but end up concentrating in Canada’s north. Furthermore, the processes which are causing the transport of contaminants to Canada’s north are not controllable and will continue to transport chemicals into the future. Canada’s arctic region is a vulnerable eco-system. The indigenous population and northern eco-system will experience impacts from release of mercury and similar chemicals into the future.

As a result of their physical geography, the indigenous population faces increased health risks compared with the rest of Canadian society. Respecting environmental justice in CEPA will allow for these health and environmental effects to be explicitly considered in decision-making as a determinant of health (see Appendix A).

Including environmental justice in CEPA will also improve its contribution to ‘sustainable development’. In Alberta, coal fired power plants have been located in close proximity to each other on Lake Wabamun. In the Alberta, the framework developed for mercury releases from electric generators specifically acknowledges that there might be local increased health risks, or ‘hotspots’. These hotspots are created because mercury also deposits in the local vicinity. If there is one large source of emissions, or a collection of smaller sources which collectively contribute large emissions, there may be a local increase in health and environmental risks. Environmental justice contributes by recognizing the environment as a determinant of health, and mitigating the creation of unsustainable communities.

In many instances, low socioeconomic status Canadian communities have been created within close proximity to large industrial complexes. The local environment has been

impacted as a result of the previous emissions. The local communities are not empowered to make the changes necessary to the environment to protect public health. In Canada this situation is typified in Sydney Nova Scotia (see Appendix B). The communities surrounding the Sydney tar ponds have been contaminated from the century of steel and coke emissions, and there has been no comprehensive remedial or restorative action to address the increase in public health risks. This community has been shown to have an increase in cancer incidence and mortality. As such, communities like Sydney are not sustainable. Low socioeconomic status is considered a true risk factor for childhood leukemia in Canada.

If we consider future prospects of global mercury emissions, there are plans for a massive increase in the number of coal powered electric generators in China, India and the United States. The mercury from these facilities will deposit in Canada, and in particular, contribute to further public health and environmental risks in Canada's north. Including environmental justice in CEPA, will provide Canada with specific environmental legislation to guide our international relationships and negotiations on toxic chemicals, and show leadership by providing legislative change which respects environmental justice.

The Senate Committee has asked: "Can you identify problems with CEPA that prevent the Government of Canada from adequately protecting Canadians (notably children and Aboriginals living in the north) from mercury contamination?"

The answer to this question is that CEPA does not currently respect environmental justice and thus limits CEPA from adequately protecting Canadians, and notably children and Aboriginals living in the north. In the public health literature, children are called the "unwitting target" of environmental injustice.

CPHA recommends that under the administrative duties of the Government of Canada, that it explicitly indicate respect for environmental justice. CPHA offers the following wording for section 2 of CEPA: "**respect environmental justice in setting national standards and in environmental and public health decision-making, where respecting environmental justice means ensuring that identifiable groups, local communities, or low socioeconomic status, and vulnerable eco-systems, do not face increased health risks because of these characteristics.**"

Environmental justice needs to be incorporated into regulations which are developed.

4. Part 3 - Information Gathering

In section 46, in the 'list' regarding information, what a reasonable person might have, there is only mention of 'pollution prevention'. There are no specific provisions with respect to public health or protection of public health.

At this time, knowledge of population exposure to mercury is mainly obtained through data collected in the United States, through their national human health surveillance program. There are no specific requirements in section 46 with respect to monitoring human exposure from releases of chemicals to the environment from processes or products. The CPHA recommends that CEPA include a section specifically with respect to human health similar to section 44 on environmental data and research and section 48, the national inventory. CEPA needs a similar clause to section 50, publication of inventory, i.e., publish the national human health toxic chemicals monitoring program.

CPHA recommends a new section under information gathering that states: **a national human health monitoring program of toxic chemicals shall be established, and that the information gathered on human exposure shall be made public.**

Respecting the principle of environmental justice needs to be included in the information gathering program. If we consider the sources of mercury, primary point sources like coal fired power plants, smelters, hazardous waste incinerators, old car recycling yards, etc., these facilities, as part of their operations, currently do not monitor the environment to show the impact of their emissions and potential pathways of human exposure. Information gathering needs to specifically reference populations who may have greater human exposure as a result of their geographic location.

CPHA recommends a new clause state: **In respecting environmental justice, the national monitoring program shall specifically include populations where there could be greater exposures than the national average.**

In evaluating the potential human health impacts, CPHA encourages the Government of Canada to also include provisions to specifically request health data gathered from other jurisdictions. For example, toxicity data has been collected in Europe and the United States. The International Agency of Cancer Research (IARC) and the US. National Toxicology Program assessed many chemicals with respect to their carcinogenicity and other human health effects.

CPHA recommends the following: **The Ministers shall collect and consider the information and scientific assessments of other jurisdictions.**

5. Part 5 – Controlling Toxic Substances

5.1 Virtual Elimination

The current definition of virtual elimination does not actually mean “virtual elimination”. The definition is limited to “below the level of quantification specified”. Mercury provides for an excellent example to show why the definition falls short.

As stated previously, mercury is persistent in the environment, and it bio-accumulates in living organisms. Currently in CEPA, virtual elimination only means “releasing mercury into the environment at a specific rate”. Under the current pollution prevention plans for mercury, specific “caps” have been recommended for existing coal fired power plants, i.e., no quantity of mercury greater than this amount can be released from the existing facilities.

For new facilities would be required to meet new emission rates. The concern or example, mercury from coal fired electric generation has been reduced to a specific rate based on kg/kilowatt hour of operation. If our international partners were to adopt the CEPA legislation for new facilities, and given there are hundreds of plants being contemplated, the amount of mercury released would be phenomenal.

The CWS for coal fired power plants contains a clause suggesting a “review” on capture technologies of mercury, and is basically a ‘continuous improvement’ provision. This concept needs to be embedded within CEPA as a clause for ‘continuous improvement’.

CPHA recommends that the definition of ‘virtual elimination’ be amended to include a “continuous improvement” clause. The continuous improvement clause would require, in addition to the specified pollution prevention reductions, the comment that: **“facilities are expected to provide plans for continuous improvement on 5 year intervals for reductions in the release of toxic chemicals until such time that the releases are negligible.”**

The specific chemicals which are considered for virtual elimination should be those which show significant human health effects in addition to those which persist and bio-accumulate in the environment.

CPHA recommends that CEPA section 65 (2) specifically reference chemicals for the virtual elimination list that have been found to be carcinogenic (IARC list groups I and II, US EPA NTP), neurotoxic, and have developmental and reproductive effects.

CEPA should clearly articulate that exposure to carcinogens should be minimized as much as possible. It is noteworthy the number of Canadians developing cancer has been increasing, the total cancer incidence increased slightly between 1969 and 1996, but it increased dramatically for specific types of cancer: lung (women), melanoma, testis, thyroid and non-Hodgkin's lymphoma. At some point in their lifetimes, 38% of Canadian

women and 41% of Canadian men are likely to develop cancer. This is an increase from estimates in the not too distant past of 1 in 4. Brain cancer and leukemia has increased in children over the last 25 years in both the United States and Canada. It is important to recognize that cancer costs Canadians more than \$14 billion every year.

The United States Environmental Protection Agency has developed child specific uncertainty factors for use in health risk assessments. Canada needs to follow their lead.

In establishing the guidelines and standards for carcinogenic chemicals, the Government of Canada should use a 1 in 1 million life time risk. It is noteworthy that there has been a shift, particularly in some provinces, to adopt a 1 in 100,000 life time cancer risk in health risk assessments and guideline setting practice. It needs to be recognized that from a Canadian population perspective, this change represents an additional 300 Canadians that may develop cancer over their lifetime.

CPHA recommends that the Government of Canada in establishing quantities, in developing guidelines and standards, and in implementing virtual elimination, section 65 (3), use 1 in 1 million cancer health risk, and use child specific uncertainty factors in health risk assessments.

CPHA recommends that section 65 (3) contain the additional clause that: **“precautionary measures should be taken to minimize releases and exposures to as low as practically possible below any established quantities of release or environmental quality guidelines”.**

The CPHA notes that the US Environmental Protection Agency adopted similar wording for its 2001 regulation on lead.

5.2 Regulations

The CPHA comments at this point, that the CWS are not regulations. The provinces are not “legally bound” to implement the CWS for mercury. **CPHA recommends that section 2(1)(g) standards, section 55.1, add the wording, “legally enforceable standards”.**

CPHA recommends that consistent with the changes necessary with the primary purpose of the act, section 90 (1.1) reflect the importance as a priority, of taking remedial and restorative actions for toxic substances in the environment. Currently section 90 (1.1) only references pollution prevention, and does not address the presence of toxic substances in the environment from previous human activities. The presence of these toxic substances may pose a public health and environmental risk. The priority needs to reflect this fact.

Perhaps the most well known example in Canada is the Sydney community. Several toxic substances like lead, arsenic, benzene, and polycyclic aromatic hydrocarbons are present above Canadian soil quality guidelines in residential soil and people’s basements.

The Government of Canada has collected data establishing the presence of these contaminants but has not taken remedial measures to address the contamination and protect human health (see Appendix B).

With respect to mercury, chlor-alkaloi plants changed processes, switching to a pressure leaching process, such that mercury was no longer used and released. However, mercury resides in holding ponds. Pollution prevention does not address this mercury contamination. In this respect, there is a need for 'remedial and restorative measures'.

CPHA recommends that section 90 (1.1) state: “the Ministers shall give priority to pollution prevention and remedial and restorative actions”

In section 93, the list for which regulations are intended are limited to “released into the environment”. The regulations for toxic substances need to be broadened to specifically include information gathering under part 3 sections 44 and 46.

CEPA is an excellent legislation giving the Government of Canada the tools to protect the environment and public health. However, it has only been used for a small number of chemicals. In section 93, the list of regulations, are limited to the “List of Toxic Substances in Schedule 1”. For toxic chemicals on Schedule 1, there is an abundance of scientific evidence such that they are known to cause public health and environmental health effects. Therefore the applicability of the regulations in CEPA do not consider the precautionary principle.

The precautionary principle should be applied in developing regulations for toxics for which we do not have scientific certainty. Regulations can be used to gather information and generate scientific data to develop the science needed for protecting the environment and public health from these chemicals.

Consistent with the precautionary principle, the CPHA recommends that this limitation of the applicability of regulations not be limited to schedule 1. The regulations need to be applicable to any substance on the Domestic Substance List. This change will allow for CEPA regulations to be used for a wide variety of needs like information gathering and capacity building with respect to all toxic chemicals.

The Government of Canada should consider the regulations of international partners, and adopt the strictest regulations of all jurisdictions. This will place Canada in a strong moral position with respect to negotiating international treaties. Mercury illustrates that one of the key things the Government of Canada needs to do is work with international partners to virtually eliminate any further mercury releases to protect public health and the environment.

In addition, if Canada adopts strict regulations, this will create the incentives for developing pollution prevention technologies. For example, as stated previously, China and India are planning to build hundreds of coal fired power plants. Canada is one of the first countries to initiate pollution control for mercury. Canadian industry will be

developing the technology at commercial scale, and thus be in a unique situation of supplying the technology to China. Thus Canada will be in a position to provide its international partners with legislative developments to address toxic chemicals that protect public health and the environment and provide technology to implement the legislation.

CPHA recommends that in developing regulations, the Minister shall: consider regulations of international partners, and ensure that Canada has equal or stricter regulations for governing toxic chemicals.

6. Public Consultation

CEPA contains a number of references where the Ministers shall consult. For example, information gathering, section 47 (2), pollution prevention, section 62 (2), controlling toxic substances, section 69 (2), etc...

With respect to information gathering, the local public and NGOs should be part of the consultation with respect to both the 'information requested' and to review the 'information gathered'. With respect to pollution prevention, CEPA should necessitate 'public consultation' with the local community and NGOs with respect to development of pollution prevention plans and review of the results of pollution prevention plans.

CPHA recommends that CEPA needs a clear and precise public consultation process to make sure the diversity is heard, and that consensus be developed or a range of acceptable solutions are explicated.

The CPHA recommends that CEPA be amended to specifically mention the "local community" and "non governmental organizations" (NGOs) in the consultation processes.

Attachment A

Lambert TW. Soskolne CL. Bergum V. Howell J. Dossetor JB. Ethical Perspectives for Public and Environmental Health: Fostering Autonomy and the Right to Know. Environmental Health Perspectives. 2003; 111: 133-137.

Attachment B

Lambert TW. Guyn L. Lane S. Development of Local knowledge of Environmental Contamination in Sydney Nova Scotia: Environmental health practice from an environmental justice perspective. Science of the Total Environment 2006; 368: 471-484.