



Registered Nurses' Association of Ontario
L'Association des infirmières et infirmiers
autorisés de l'Ontario

Health First!
Submission to Environmental Registry on
Creating Ontario's Toxics Reduction Strategy,
the Ministry of the Environment Discussion
Paper

October 10, 2008

Registered Nurses' Association of Ontario
(RNAO)

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- substitution of safer alternatives to toxics
- mandatory pollution prevention plans by industry, to be certified by planners
- materials accounting for use and release of toxics
- regular reporting on progress in toxic reduction by facilities
- comprehensive community right to know about toxics in the environment, in the workplace and in consumer products (including labeling)
- allowing most health-protective laws and bylaws to prevail (unlike the recent pesticide legislation, Bill 64, that voided municipal pesticide bylaws)
- establishing an independent university-based research institute that will build Ontario's capacity for toxic use reduction, safe substitution and green chemistry
- establishing programs to deliver technical assistance on toxic use reduction for industry, for labour, and for communities.
- adequate funding for the above programs through fees on toxic use and release.
- strong compliance remedies for government and the public

The Ministry discussion document delivers some of these requirements, but not all:

- It proposes new requirements for toxics: materials accounting (for use, release and disposal); toxic reduction plans; reporting; and public disclosure. Compliance with reduction plans is voluntary; voluntary programs generally experience difficulties with compliance.
 - Aggressive targets must be added.
 - A focus on substitution of safer alternatives must include identification of priority toxics for substitution and company toxic reduction plans based on government alternative action plans.
- It proposes to cover only certain users and emitters. It would only include those using designated toxics: if the toxic use exceeds a designated threshold; and if the facility is in a designated sector (manufacturing or minerals processing); and if the facility exceeds an employment threshold (10 full-time employees) or use threshold (10,000 kilograms or federal threshold). This misses smaller emitters and other sectors; in cities like Toronto, the large majority of emissions would not be covered.
 - More chemicals must be covered, and the phase-in of coverage must be simplified and accelerated.
- It proposes a ban or restriction on toxics in consumer products, and requires public reporting on toxics in those products. This is welcome, but a requirement for inclusion in labeling must be added.
- Technical assistance is proposed, but this must be backed by the creation of bodies mandated to provide this assistance and funded through toxic use fees.
- It proposes to provide Ontarians with information on toxics in the environment and in consumer products. This is essential.
- It proposes economic and other incentives for toxic reduction. This must be supplemented by strong compliance remedies for government and the public.

In sum, the Ministry discussion document represents an important step in the right direction, but RNAO cannot support toxics reduction legislation that does not meet the significant concerns cited here, and which our many health and environmental partners share. RNAO will continue to work with Ministry officials to help ensure that Ontarians receive the high level of protection from toxics that they need and deserve.

Letter Template and Instructions:

Please go to (<http://www.ebr.gov.on.ca/ERS-WEB-External/searchComment.do?actionType=>

Dear Minister Gerretsen:

I am a nurse who is very concerned about the risk to health from the widespread use

Strong toxic use reduction legislation must include:

- . ambitious targets for reductions in toxic releases, which have proven achievable i
- . broad coverage of use and emission
- . this would include more chemicals than proposed in the discussion paper
- . this would include all significant sources of toxics, and not just large users in t
- . substitution of safer alternatives to toxics
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To repeat, I am pleased that the Government is committed to toxic use reduction legi

Thank you for your attention in this matter of importance to nurses.