



CANADIAN ENVIRONMENTAL LAW ASSOCIATION
L'ASSOCIATION CANADIENNE DU DROIT DE L'ENVIRONNEMENT

January 7, 2009

Jon Kerner and Larry Stoffman
National Committee on Environmental and Occupational Exposures
Canadian Partnership Against Cancer
Dear Jon and Larry,

Membership in NCEO Action Group

The Canadian Environmental Law Association (CELA) has been a member of the NCEO Action Group since the formative National Symposium on Cancer Prevention in 2003. Our former Executive Director, Paul Muldoon was our first member and our current representative Sarah Miller replaced him. CELA provided offices and resources to our Research Associate Anne Wordsworth when she was contracted by the Canadian Strategy for Cancer Control to author the *Prevention of Occupational and Environmental Cancers in Canada: a Best Practices Review and Recommendations*. This report has become the foundation for the priorities of our Action Group.

We have reviewed with interest your new Terms of Reference for Action Groups. We realise that CELA has been involved since the beginning taking us beyond your target of committee membership of three years. However we feel that continuity is crucial to our Action Group at this juncture and that our role in assisting with the environmental and legal components of health protection is a valuable one at this time. Working in coalitions with health and labour groups on common objectives has been crucial to the progress we have seen in environmental law and policy in the last decade. All partner communities together have achieved what they could not have working alone in one sector.

This work is going to take time and persistence to be successfully and fully implemented. Ontario's Toxic Use Reduction initiative and Toronto's community right-to-know programme are not slated to phase-in substantially until 2010. We are very excited about the potential to coordinate this work with the CAREX research and to see toxic use reduction spread across the country but both of these efforts are in their infancy. We are eager to be part of these programs once they are fully rolled out. We recommend that Committee membership should be large enough to include key sector members while also being geographically representational.

Some of the background and program focuses of CELA that would assist in NCEO's mandate include:

- work since the creation of the Canadian Environmental Protection Act on efforts to strengthen this federal law. Our efforts have led to the Chemicals Management Plan reforms underway today which we are closely monitoring,
- current efforts to shape Ontario's pending Toxic Use Reduction Law and strategy by writing a Model Law which could also assist other provinces,
- work with members of the Taking Charge of Toxics Coalition as well as with other environmental coalitions on this campaign,
- local work on the successful campaign for Toronto's Environmental Reporting, Disclosure and Innovation By-Law with the Toronto Cancer Prevention Coalition,
- CELA has partnered with Environmental Defence on the www.pollutionwatch.org web site that gives the public the ability to track pollution discharges in their neighbourhoods and learn about the health implications of these releases,
- international work includes published reports comparing EU, US and Canadian chemicals management laws and policies, as well as negotiations on the Stockholm Convention and the Treaty on Persistent Organic Pollutants, and considerable work on pollution prevention and health in the Great Lakes,
- CELA does research for the Canadian Partnership for Children's Health and the Environment, and
- CELA is currently involved in a project with the Environmental Health Institute of Canada linking environmental health, poverty and justice issues in six Ontario Communities.

We hope your evaluation of the future work of your action groups will allow us to continue to work with you at a time when decisions such as these will determine the success of our collective efforts to date. Sarah is certainly interested in continuing her involvement at this time and others on staff maybe available for future service.

Yours truly
Canadian Environmental Law Association



Theresa McClenaghan
Executive Director