

## Ontario Public Health Association &

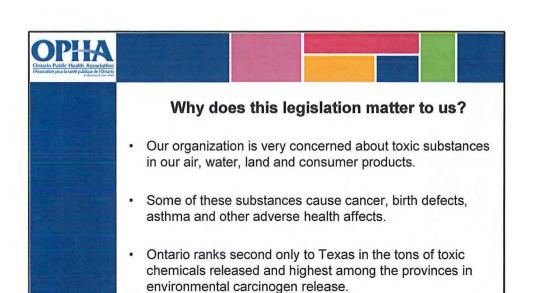
# The Government Committee on the Toxics Reduction Act

- Ontario Public Health Association (OPHA) commends the Ontario government for taking action to reduce exposure to toxic substances in order to improve the health of the public.
- · The Toxics Reduction Act is a good first step.

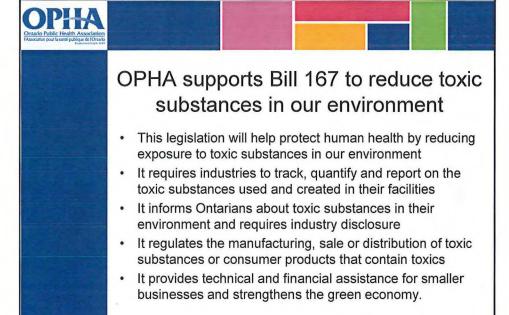


#### Who we are

- The Ontario Public Health Association is a member-based volunteer non-profit organization that provides leadership on issues affecting the public's health and strengthens the impact of people who are active in public and community health throughout Ontario.
- Among our members are public health inspectors and environmental health specialists who implement the Health Hazards Prevention and Management program under the Health Protection and Promotion Act and the many public health professions implementing the Chronic Disease Prevention Program.
- We are a supporter of the Take Charge of Toxics campaign lead by the Canadian Cancer Society.



 We believe that our citizen have a right to know what is in their products and their environment.





## We would like to see the legislation strengthened in the following ways:

- Set targets for the reduction in use, creation and release of toxics – 50% in 5 years.
- Inform people of exposures in their environment and products.
- Address more substances, lower the thresholds and include more sectors.
- · Require substitution when possible.
- · Assist companies in finding alternatives.
- Develop a reporting system and monitor progress.



### Set targets for the reduction in use, creation and release of toxics – 50% in 5 years

- The statute should include renewable reduction targets.
- Targets are necessary to stimulate reduction and regulate toxic use and release.
- Targets can spur innovation and allow benchmarks for measuring and monitoring progress.



### Inform people of exposures in their environments and the products they use

- OPHA supports your commitment to inform the public with the posting of a summary of industries' toxic reduction plans.
- We recommend that the legislation require companies to also disclose their actual use, creation and release of toxic substances.
- All ingredients in consumer products should be disclosed on product labels and if cancer causing, the product should display a hazard symbol.



#### Address more substances, lower the thresholds and include more sectors.

- The 45 substance identified represent only 14% of total number of substances currently subject to the NPRI, an already inadequate list of toxic substance that should be subject to reduction.
- The threshold for size of company covered by this legislation should be reduced from 10 to 5 employees.
- The threshold for quantities of toxic substances requiring reporting should also be reduced from the proposed 10,000 KG. Collectively, these facilities can contribute significantly to local emissions
- Include all sectors that use listed substances above the regulatory thresholds, not just those in manufacturing.



#### **Require Substitution Whenever Possible**

- OPHA recommends mandatory voluntary reduction and substitutions, where available,
- Ontario is a top discharger of toxics in North America; implementation of safer alternatives is critical to reducing harmful emissions.
- Substitution of priority chemicals is now required under the EU's REACH program and soon will be introduced into the Massachusetts' Safe Alternatives Bill.
- Requiring substitution will assist in spurring green technology.



#### **Assist Companies in Finding Alternatives**

- An institute to assist companies reduce toxic use and release is critical to the success of this legislation.
- Identifying safer alternatives and substitutions should be guided by best-available science, and a Toxic Use Reduction Institute is the best way of ensuring this.
- OPHA recommends that a university-based research institute be established to increase Ontario's capacity for toxic use reduction activities, safe substitutions, green chemistry, education and information outreach and, most importantly, training on toxic reduction planning.

