



Take charge on toxics campaign
55 St. Clair Avenue West, Suite 500
Toronto, ON M4V 2Y7
Tel: (416) 323-7067

Response to Industry Arguments

Argument #1: Ontario's proposed toxic use reduction legislation is not needed.

Response: Ontario is one of the top dischargers of toxics in North America and the number one discharger in Canada. In Ontario, every year the number of newly diagnosed cancers increases by 2.5 per cent; it is projected that in year 2020, there will be 91,000 new cancers diagnosed.¹ Toxic use reduction legislation will reduce or eliminate toxic chemicals resulting in less cancer-causing substances and reduces risk to the health of workers and the public.

Argument #2: Ontario's proposed toxic use reduction legislation will hurt businesses and will not provide any environmental benefits.

Response: Experience with toxics reduction legislation in Massachusetts and New Jersey has demonstrated that such laws result in lower business costs, and corresponding reductions in public and workplace environmental health risks. Massachusetts's companies saved \$14 million by changing to more efficient processes and safer chemicals. Companies in Massachusetts's also reduced their toxic waste by 64 per cent and their off-site releases to the environment by 91 per cent. Many companies have also found that being able to claim that they are helping the environment and contributing to public health gives them a significant competitive edge.

Argument #3: Ontario's toxics use reduction legislation will result in competitors learning business secrets and create chemical-phobia.

Response: This has not been the experience in other jurisdictions, such as Massachusetts and New Jersey. There is no reason to think the situation will be any different in Ontario. Informing Ontarians about toxic chemicals in their environments will empower them to make informed decisions about their health.

Argument #4: Ontario's proposed list of non-NPRI chemicals is not science-based like the federal Chemicals Management Plan ("CMP") list under the Canadian Environmental Protection Act and if the Ontario list expands beyond CMP it will impose an undue burden on reporting facilities and undermine federal-provincial harmonization efforts.

Response: Ontario's list was developed in part using CMP categorization data. Environment and health are concurrent areas of jurisdiction under the Constitution and to the extent Ontario has a made-in-Ontario toxics problem there is no reason for the province to restrict itself to a made-in-Ottawa solution. Any additional reporting obligations companies may have under Ontario's law will be more than offset by lower compliance costs and improved performance as unnecessary reliance on toxics is reduced.

¹ Canadian Cancer Society, Cancer Care Ontario. *Targeting cancer: an action plan for cancer prevention and detection*. Cancer 2020 background report. Toronto: Canadian Cancer Society, Cancer Care Ontario, 2003.