

November 28, 2023

Greg Carreau
Director General
Safe Environments Directorate
On behalf of the Minister of Health

Delivered via E-mail

Dear Mr. Carreau:

Re: CANADIAN ENVIRONMENTAL PROTECTION ACT, 1999

Proposed Residential Indoor Air Quality Guidelines for Benzene

CELA writes to support the proposal by Health Canada to reduce the long-term guideline for indoor air quality for benzene to 0.6 µg/L.

CELA is a national ENGO founded in 1970, and a Legal Aid Ontario funded specialty clinic for environmental law. CELA focuses on ensuring access to justice, and on pollution prevention and safety; particularly from the perspectives of vulnerable and under-resourced communities.

We have reviewed the associated white paper published together with the Notice of consultation for the proposed Residential Indoor Air Quality Guidelines for Benzene. CELA is in agreement with reducing the standard due to the documented health effects associated with long-term exposure to benzene in indoor air. CELA particularly notes the disproportionate impact on women, children, and Indigenous communities, as noted in the white paper possibly due to differences in metabolism. We also note that young children and their caregivers may spend longer periods of time in the home and exposed to the associated indoor air quality, for example, than school age children and people working outside of the home.

CELA also appreciates the practical advice provided in the Guidance and supported by the studies discussed in the white paper, as to how residents may manage the risks of benzene in indoor air quality, and reduce their exposures. The studies that showed reduced risks (assuming that outdoor air quality is better on the given day) from opening windows frequently; running ventilation systems; operating fan vents properly; and avoiding sources of benzene storage in the indoor environment are appropriate and necessary steps that Canadian residents may take to reduce their exposures.

Canadian Environmental Law Association

CELA recommends that Health Canada also conduct an educational campaign to increase Canadians' appreciation of the risks of benzene in indoor air, together with the practical advice as to reducing those risks. Health Canada should especially pay attention to locations with at-risk populations, such as licensed and home day cares, schools, and communities with surrounding sources of outdoor benzene including petroleum facilities; neighbourhoods nearby to gasoline filling stations, natural gas compressor stations, and major highways. These communities are at increased risk of exposure to any indoor sources of benzene if present, and inadequately ventilated, along with both episodic and chronic influxes of benzene into the home environment from those external sources. Additionally in outreach and education efforts, Health Canada should focus on Indigenous communities as noted above, as well as ensure provision of educational information in multiple languages.

While many of the recommended measures to reduce risk of exposure to indoor sources of benzene are low-technology (for example, recommendations to avoid storage of gasoline and gasoline burning appliances, paints and solvents indoors or in attached garages), CELA predicts that this information is not yet well known or understood in the Canadian population. For example, the white paper cited studies as to the large percentage of residents who do store these products in attached garages due to Canadian winters. Further information as to effective and affordable methods to add ventilation to attached garages should be provided.

CELA also recommends that Health Canada pursue support programs through tax measures as well as direct grants, in order to provide incentives and assistance to Canadians to increase appropriate and effective ventilation of indoor living spaces. This is necessary both for reduction of exposure to radon (another priority of Health Canada) as well as for the demonstrated need to reduce indoor benzene exposures.

We trust these comments are of assistance.

Yours very truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION

A handwritten signature in black ink, appearing to read 'Theresa McClenaghan', written in a cursive style.

Theresa McClenaghan
Executive Director & Counsel