

**Quebec civil society takes a stand on the *Canadian Environmental Protection Act, 1999*:
Call for the government to strengthen CEPA to protect human health and the environment**

We, the undersigned civil society groups of Quebec, endorse the report of the *Standing Committee on Environment and Sustainable Development* to strengthen the *Canadian Environmental Protection Act, 1999* (CEPA). Although the mission of CEPA is "to contribute to sustainable development through pollution prevention [...] from both a human and an environmental perspective" (Standing Committee on Environment and Sustainable Development, 2017), it must be said that toxic substance regulations are obsolete and do not ensure the protection of the environment or the health of populations. **Specifically, the Act does not prevent the circulation of carcinogens, reproductive toxicants and/or endocrine disruptors through various consumer products.**

It is urgent and crucial that the Parliament of Canada revise CEPA in line with the report. In particular, our organizations approve the following recommendations with regard to CEPA:

I. DEFINITIONS AND BURDEN OF PROOF

1. Revise the definition of "toxic" to ensure that it addresses endocrine disruptors.

Endocrine disruptors cause harm to the hormone system by mimicking, blocking and/or disrupting hormones, which can lead to the development of various diseases such as breast and prostate cancer, as well as male infertility and early puberty in girls. Astonishingly, endocrine disruptors are not considered toxic substances under CEPA, since a substance's toxicity is defined by its concentration, in other words the greater the quantity of a substance, the more toxic it is deemed to be. However, endocrine disruptors contradict this principle, since they are dangerous at low levels whereas they have few effects at high levels.

2. Reverse the burden of proof for substances of very high concern such as carcinogens, reproductive toxicants and endocrine disruptors.

Substances of very high concern must be banned unless the industry can demonstrate that they can be used safely and that there are no feasible substitutes or alternatives.

3. Require that risk assessments include aggregate exposure to and cumulative and synergistic effects of the substance.

The regulation of toxic substances under CEPA operates substance by substance, which does not reflect the daily reality of Canadians, who are exposed simultaneously to toxic substances that interact with each other.

4. Update the *Persistence and Bioaccumulation Regulations*.

The criteria defining persistence and bioaccumulation are not sufficiently strict, which prevents many substances from being considered toxic. The Canadian threshold to determine whether a substance is bioaccumulative is three times higher than that of the United States and Europe. What is considered bioaccumulative in Canada is considered highly bioaccumulative in Europe (MacDonald and de Leon, 2013).

II. PROTECTING THE PUBLIC

5. Take into account vulnerable populations and marginalized communities, including their exposures during critical windows of vulnerability, when assessing risk.

Certain populations, such as children, pregnant women, the elderly and Indigenous persons, are particularly vulnerable when exposed to toxic substances. Vulnerability can result from the level of exposure to toxic substances or from susceptibility, that is, the fact of being more liable to feel the effects of exposure to toxic substances. Susceptibility can occur during critical windows of vulnerability such as puberty, a period of hormonal change during which the effects of endocrine disruptors are more acute.

6. Require mandatory hazard labelling of all products containing toxic substances.

Workers' "right to know" about hazardous substances in consumer products must extend to the Canadian population as a whole. This labelling method would allow Canadians to be aware that certain consumer products can entail risks for human health, such as cancer and male infertility.

7. Recognize the right to a healthy environment.

Over 150 countries have already adopted this right, which protects the quality of air, water and soil for their populations.

III. LEGALLY BINDING AND ENFORCEABLE NORMS AND THE EVALUATION PROCESS

8. Develop legally binding and enforceable national standards for air quality.

We are currently the only industrialized country that has not enacted any legally binding national standard, and our discretionary guidelines are often less strict than the legally binding standards enacted in other countries.

9. Improve and prescribe timelines applying to toxic substance risk management measures.

Measures pertaining to toxic substances under CEPA can be postponed indefinitely, as demonstrated by the long time required to ban or restrict the use of substances such as asbestos, triclosan and brominated flame retardants.

10. Improve assessment and approval of new substances.

The assessment and approval process of new substances under CEPA contains an abundance of loopholes and regulatory vagueness with respect to both new toxic substances and new genetically modified organisms that are proposed for use in Canada.

11. Assess and identify alternatives to toxic substances and place the burden on industry to show that safer substitutes are not available.

Industry must show that safer substitutes are not available, so as to prevent the use of substitutes that are as toxic as or more toxic than the banned substances.

12. Correct the toxic substance assessment or reassessment process.

The aspects of CEPA that are designed to facilitate the toxic substance assessment or reassessment process have been shown to be inadequate to the task. We recommend defining three clear "triggers" to determine substances requiring assessment: new scientific evidence of harmful effects on human health and the environment; the enactment of a ban or a significant restriction of the use of a substance in a foreign Member State of the Organization for Economic Cooperation and Development or in a subdivision of that State; and the possibility for individuals to ask that a substance be assessed.

Signatory groups

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| 1 |  <p>ACTION CANCER DU SEIN DU QUÉBEC
BREAST CANCER ACTION QUEBEC
OUR BODIES, OUR ENVIRONMENT</p> | Breast Cancer Action Quebec (BCAQc) |
| 2 |  <p>Cinbiose
Centre de recherche interdisciplinaire
sur le bien-être, la santé,
la société et l'environnement</p> | Centre de recherche sur le bien-être, la santé,
la société et l'environnement (CINBIOSE) |
| 3 |  <p>CNHE/IISE
Canadian Nurses for Health & the Environment
Infirmières et Infirmiers pour la Santé et l'Environnement</p> | Canadian Nurses for Health & the Environment |
| 4 |  <p>centr
ERE
Centre de recherche
en éducation et formation
relatives à l'environnement
et à l'écocitoyenneté</p> | Le Centre de recherche en éducation et
formation relatives à l'environnement et à
l'écocitoyenneté |
| 5 |  <p><i>Conseil des
Montréalaises</i>
Regroupement
naissance renaissance</p> | Conseil des Montréalaises |
| 6 |  | Regroupement Naissance-Renaissance |
| 7 |  <p>FONDATION
FILLES D'ACTION
GIRLS ACTION
FOUNDATION</p> | Girls Action Foundation |
| 8 |  <p>Fédération des femmes
du Québec
Égalité pour toutes, égalité entre toutes</p> | Fédération des femmes du Québec |
| 9 |  <p>EAU
SECOURS!
COALITION QUÉBÉCOISE
POUR UNE GESTION RESPONSABLE DE L'EAU</p> | Coalition Eau Secours! |
| 10 |  <p>20 ans
rqasf
Réseau québécois d'action
pour la santé des femmes</p> | Réseau québécois d'action pour la santé des
femmes (RQASF) |
| 11 |  <p>Travail
CIAFT
Conseil d'intervention pour l'accès des femmes au travail</p> | Le Conseil d'intervention pour l'accès des
femmes au travail (CIAFT) |
| 12 |  <p>uttam</p> | Union des travailleuses et travailleurs
accidentés ou malades (UTTAM) |

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| 13 |  | Association féminine d'éducation et d'action sociale (AFEAS) |
| 14 |  | Réseau des Tables régionales de groupes de femmes du Québec |
| 15 | <p style="font-size: small;">Table de concertation
du mouvement</p>  | Table de concertation du mouvement des femmes de la Mauricie (TCMFM) |
| 16 |  | Réseau d'action pour l'égalité des femmes immigrées et racisées du Québec (RAFIQ) |
| 17 |  | Women of Diverse Origins |
| 18 |  | Regroupement des cuisines collectives du Québec |
| 19 |  | Relais-Femmes |
| 20 |  | Fédération des maisons d'hébergement pour femmes |
| 21 |  | Regroupement québécois des centres d'action et de lutte contre les agressions à caractère sexuel (RQCALAC) |
| 22 |  | Table de concertation de Laval en condition féminine |
| 23 |  | Regroupement des maisons pour femmes victimes de violence conjugale (RMFVVC) |
| 24 |  | Comité Exécutif de l'association des étudiants et étudiantes en École de Santé Publique de l'Université de Montréal |

25		The Green Coalition
26	choeur maha	Choeur Maha
27		Mouth Music
28	 RGPAQ	Le Regroupement des groupes populaires en alphabétisation du Québec
29		Réseau des femmes en environnement
30		Centre des femmes solidaires et engagées
31		Service d'entraide Passerelle
32	 CDEACF Centre de documentation sur l'éducation des adultes et la condition féminine	Centre de documentation sur l'éducation des adultes et la condition féminine (CDÉACF)
33	 L' R DES CENTRES DE FEMMES DU QUÉBEC	L'R des centres de femmes du Québec
34		Collectif pour un Québec sans pauvreté
35		Réseau des femmes des Laurentides (RFL)
36		Studio XX - Feminist Media Arts Centre

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| 37 | 
Ligue des
droits et libertés | The Ligue des droits et libertés |
| 38 | 
Centre des femmes
de Saint-Laurent | Centre des femmes de Saint-Laurent |
| 39 | 
Action Travail des Femmes | Action travail des femmes |
| 40 | 
Centre des
FEMMES
de Longueuil | Centre des femmes de Longueuil |
| 41 |  | Les Éditions du remue-ménage |
| 42 |  | South Asian Women's Community Centre
(SAWCC) |
| 43 |  | COCO: The Centre for Community Organizations |
| 44 | 
INSTITUT
Simone
de Beauvoir
INSTITUTE | Simone de Beauvoir Institute (SDBI) |
| 45 |  Réseau d'action des femmes
en santé et services sociaux | Réseau d'action des femmes en santé et
services sociaux |
| 46 | 
Table des
groupes de femmes
de Montréal | Table des groupes de femmes de Montréal |
| 47 |  | Mouvement d'éducation populaire et d'action
communautaire du Québec |
| 48 | 
Au
bas de
l'échelle
À LA DÉFENSE
DES PERSONNES
NON SYNDIQUÉES | Au bas de l'échelle |

- 49  ACT: Ageing, Communication, Technologies: Experiencing a Digital World in Later Life.
- 50  Réseau des lesbiennes du Québec *pour la visibilité sociale et politique des femmes de la diversité sexuelle*
- 51  Ressources Ethnoculturelles Contre l'Abus envers les Aîné(e)s
- 52  Participatory Media Cluster
- 53  Seréna Québec
Managing Your Fertility Naturally
- 54  ConcertAction femmes Estrie
- 55  Le Centre de femmes l'Essentielle
- 56  Regroupement des centres de la petite enfance de la Montérégie (RCPEM)
- 57  Les Cercles de Fermières du Québec
- 58  Groupe-Ressource du Plateau Mont-Royal
- 59  Canadian Unitarians for Social Justice, Quebec Chapter
- 60  Table de concertation des groupes de femmes du Bas-Saint-Laurent

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| 61 |  | Centre ressources pour femmes de Beauport (CRFB) |
| 62 |  | Carrefour d'éducation populaire de Pointe-Saint-Charles |
| 63 |  GRAND CONSEIL DE LA NATION
WABAN-AKI | Le Grand Conseil de la Nation Waban-Aki |
| 64 |  | L'Assemblée des groupes de femmes d'interventions régionales |
| 65 |  | Centre des femmes de Verdun |
| 66 |  CINEMA POLITICA
SCREENING TRUTH TO POWER | Cinema Politica |
| 67 |  | The Canadian Council of Muslim Women, Montreal Chapter |
| 68 |  | Afrique au Féminin |
| 69 |  | Regroupement des aidants naturels du Québec |
| 70 |  | The Council of Canadians, Montreal Chapter |
| 71 |  | The LEAP, Montreal Chapter |

72	 <p>Regroupement des Aidantes et Aidants Naturels de Montréal</p>	Regroupement des aidantes et aidants naturels de Montréal (RAANM)
73	 <p>Coopérative Transition NDG</p>	The Transition NDG Cooperative
74	 <p>CENTRE DES FEMMES D'ICI ET D'AILLEURS</p>	Centre des femmes d'ici et d'ailleurs
75	 <p>La Marie Debout Centre de femmes Hochelaga-Maisonneuve</p>	Centre de femmes La Marie Debout
76	 <p>bonne santé</p>	Bonne Santé
77	 <p>i n INSTITUT INTERNATIONAL DE NATUROPATHIE</p>	Institut International de Naturopathie
78	 <p>TABLE RÉGIONALE DES CENTRES DE FEMMES DE MONTRÉAL MÉTROPOLITAIN ET LAVAL</p>	Table régionale des centres de femmes
79	 <p>TCGFM</p>	La Table de concertation des groupes de femmes de la Montérégie
80	 <p>la Maison des Grands-Parents DE VILLERAY</p>	La Maison des Grands-Parents de Villeray
81	 <p>La Maison de Quartier Villeray</p>	La Maison de quartier Villeray
82	 <p>CENTRE DE SANTÉ DES FEMMES DE MONTRÉAL</p>	Centre de santé des femmes de Montréal

Bibliography

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Standing Committee on Environment and Sustainable Development (2017). *Healthy environment, healthy Canadians, healthy economy: strengthening the Canadian Environmental Protection Act, 1999*. (42nd Parliament, 1st Session). Accessed at: <http://www.noscommunes.ca/Content/Committee/421/ENVI/Reports/RP9037962/envirp08/envirp08-f.pdf>

MacDonald, E., de Leon, F. (2013). Review of the *Persistence and Bioaccumulation Regulations* under the *Canadian Environmental Protection Act, 1999*. Accessed at: http://www.oag-bvg.gc.ca/internet/Francais/pet_351_f_39088.html

Resources

Breast Cancer Action Quebec

www.acsqc.ca

Blue Dot

<http://bluedot.ca/stories/cepa/>

Equiterre

<https://equiterre.org/communiquelengagement-de-la-ministre-de-lenvironnement-a-considerer-les-changements-a-la-loi-sur-le>