

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

- Our organization is very concerned about toxic substances in our air, water, land and consumer products.
- Some of these substances cause cancer, birth defects, asthma and and other adverse health affects.
- Ontario ranks second only to Texas in the tons of toxic chemicals released and highest among the provinces in environmental carcinogen release.
- We believe that our citizen have a right to know what is in their products and their environment.

Why does this legislation matter to us?

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- Ontario ranks second only to Texas in the tons of toxic chemicals released and highest among the provinces in environmental carcinogen release.
- 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 a necessary to stimulate reduction and regulating toxic use and release.
- Targets can spur innovation and allow benchmarks for measuring and monitoring progress.

Inform people of exposures in their environment and products

- OPHA supports your commitment to inform the public and a summary of industries' 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 – 5 employees. Otherwise only a small percentage of companies are affected.
- Include all sectors that use listed substances above the regulatory thresholds

Require Substitution Whenever Possible

- The proposed legislation only encourages voluntary reduction and substitutions.
- 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
- 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.

Develop a Reporting System and Monitor Progress

- Industry needs to be held accountable to the public for its use, creation and release of toxic substances.
- Full disclosure to the public is important.

Thank You

The Ontario Public Health Association would like to commend you on the legislation you have introduced and encourages you to strengthen it to protect the health of Ontarians.