ENVIRONMENTAL LAW CENTRE

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Via email: **LindaJ.Chandler@ec.gc.ca**

Dear Ms. Chandler:

**RE: Comments to Environment Canada and Health Canada for Preparation of the Parliamentary Review of *CEPA 1999*.**

The Environmental Law Centre (ELC) is a charitable organization incorporated in 1982 to provide an objective source of information on environmental law and policy in Alberta and Canada. The ELC's mission is to ensure that laws, policies and legal processes protect the environment.

The ELC is pleased to provide its submission to Environment Canada and Health Canada for preparation for the Parliamentary Committee Review of the *Canadian Environmental Protection Act, 1999*, S.C. 1999, c. 33, *as amended*. (*CEPA 1999*).

The submission is divided into the following sections:

1. General Comments
2. CEPA, 1999 Workshop Themes
   a. *Knowledge for Protecting Human Health and the Environment*
   b. *Tools for Taking Action*
   c. *Fair and Efficient Compliance Promotion and Enforcement*
   d. *Information for Canadians*
3. Response to Outstanding Issues arising in *Scoping the Issues, CEPA 1999*.

## 1. General Comments and the Federal Role in Regulating Toxic Substances

*CEPA 1999* represents a valid and necessary exercise of federal jurisdiction over substances that have the potential to harm human health or the health of the environment. The constitutional validity of this jurisdiction has been confirmed by the Supreme Court



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of Canada.[1] The federal role in preventing pollution, particularly by those substances that are deemed to be "toxic", is essential to the protection of human health and environmental health throughout Canada.

The provisions of *CEPA 1999* provide a myriad of potentially valuable and effective tools for implementing pollution prevention and sustainable development. These tools include:

- pollution prevention plans;
- substance assessment and regulation mechanisms;
- environmental protection actions;
- virtual elimination plans and regulation; and
- environmental protection compliance orders and environmental protection alternative measures.

***Implement Principles of Sustainable Development***

The upcoming review of *CEPA 1999* should focus on ways to facilitate sustainable development through the application of federal laws and policies that minimize and avoid the use, production and release of substances that are detrimental to human and environmental health. Principles of pollution prevention, precaution, public participation, and having the polluter pay must guide implementation of the *CEPA 1999* tools. The comments that follow consist of suggested policy and statutory amendments that are aimed at giving effect to *CEPA 1999* pollution prevention and sustainable development goals.

***Maintain Capacity to Implement CEPA, 1999 Nationally***

Fundamental to effective implementation and enforcement of *CEPA 1999* is the capacity of the departments (Health and Environment) to effectively and proactively seek the pollution prevention mandate. This means maintaining (and where necessary increasing) financial, technical, and professional capacity to enable *CEPA 1999* provisions in an effective, timely, independent and proactive manner.

Maintaining capacity federally is necessary to ensure a strong federal role in regulation and prevention of pollution on a national level. The importance of the capacity of the federal government and their lead role in regulation of toxic substances is of particular relevance as the past few years of CEPA implementation have seen a proliferation of soft law[2] (or non-binding) approaches and non-*CEPA 1999* approaches to manage toxic substances.

[1] *R.* v. *Hydro-Québec*, [1997] 3 S.C.R. 213

[2] Soft law is not legally binding and therefore is lacking in legal enforceability. Guidelines, policy declarations, rules or other instruments that are aimed at guiding conduct but are not legally binding are soft law.



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***Minimize Delegation and Duplication and the Resulting Marginalization of CEPA, 1999 Legal Tools***

The past five years of the administration of *CEPA, 1999* has seen the regulatory and, perhaps more importantly, the pollution prevention role of *CEPA 1999* jeopardized through deferral, delegation or delay in dealing with substances rightly within the Act's purview. The result of the "harmonization" of regulating toxic substances is a framework of actions based on voluntary measures, guidelines, policies, and agreements across numerous jurisdictions, with insufficient implementation of standards into legally enforceable tools.

There is a need for a renewed and redoubled effort on behalf of both federal departments to implement measures that will ensure that enforceable legal tools are available federally, thereby enabling the government and the public to actively promote pollution prevention. While there has been some success through voluntary mechanisms, the trend to soft law approaches to environmental protection, particularly in the absence of legally enforceable backstop regulations, are undermining our society's movement toward sustainable development.

Furthermore, the delegation or deferral of substance regulation and pollution prevention to other federal and provincial statutory and non-statutory mechanisms undermines the transparency and accountability that *CEPA 1999* provides.

To transparently, efficiently and effectively uphold *CEPA 1999* objectives there is a need to ensure a strong federal role in toxic substance regulation. This entails ensuring that legally enforceable standards and pollution prevention processes, availability under *CEPA 1999,* are not undermined through excessive deferral to other non-CEPA agencies and soft law approaches.

## 2. CEPA 1999 Workshop Themes[3]

### *A.* *Knowledge for Protecting Human Health and the Environment*

*CEPA 1999* promotes knowledge through its risk assessment and scientific and technical research mechanisms.

Section 44 of *CEPA 1999* provides various avenues through which CEPA should produce information and knowledge, not all of which appear to be occurring in a consistent and timely fashion. This includes publication and reporting on the state of Canada's environment and pollution prevention research. Capacity to undertake this work needs to be stable and consistent.

***Broaden Risk Assessments to Reflect Precaution and Pollution Prevention***

Implementing the precautionary and pollution prevention principles requires that legal or policy amendments take place to broaden substance assessments under *CEPA 1999*.

[3] The federal departments of Environment Canada and Health Canada produced and presented four themes to assist in framing the discussion around the review *CEPA 1999*.



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The current risk assessment and risk management scheme of assessing the Detailed Substances List and proposed new substances adheres to traditional assessments based on assessing the hazard associated with a substance and, to varying degree, the likelihood of exposure to that substance. This hazard risk assessment, particularly when framed within a socio-economic context, tends to ignore fundamental questions of whether the substance is necessary or whether potential alternatives to that substance exist. Principles of pollution prevention and precaution require that such a "needs and alternatives assessment" be mandated in substance assessments.

In the past there has been reliance on the market to determine the need for a substance. This reliance, and the presumptions associated with it, are misplaced and disregard the principles of sustainable development. Indeed, reliance on market mechanisms ensures that environmental, social and health impacts will be consistently downplayed or externalized, particularly when those impacts are long term.

The lack of a "needs and alternatives assessment" in the substance assessment phase of the process results in a system that is reactive, wherein we seek to manage and control substances. The assessment fails to consider possibilities of avoiding the risk altogether.

Policy and legislative amendments are required to ensure a proactive approach to substance assessment and management. This entails a mandatory needs and alternatives assessment as part of the risk assessment process. The assessment would then be utilized through legislation (or regulation) that would mandate the use of less harmful alternatives or prohibit substances from entering the market where they are deemed unnecessary.[4] The responsibility for carrying out such assessments can be placed on the proponents of the use, manufacture or release of the substances.

***An Information Clearinghouse is Required***

Toxic substances are controlled by several jurisdictions through various laws, regulations and soft law approaches. Currently, a central clearinghouse for toxic substances that captures the myriad of tools and jurisdictions governing these substances does not exist. The current nature of fragmented and, at times, ad hoc regulation of substances undermines the distribution and use of existing information regarding toxic substances.

The result, either real or perceived, is that *CEPA 1999* and the federal government are failing to deal with substances that are known to be toxic, persist and/or bioaccumulate in the environment. There is the opportunity under *CEPA 1999* to produce a central clearinghouse for information regarding the risks, management and regulation associated with toxic substances.

[4] Some comparison of substances occurs through the Toxic Substances Management Policy however a legislative or regulatory mechanism to ensure such assessments are consistently and proactively made is required.



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The existing CEPA Environmental Registry may become the platform for a more thorough clearinghouse. Its content should be expanded to provide additional information to the public and to other stakeholders, including:

- Risk assessment information and details regarding uncertainties that exist for assessed substances;
- Information regarding provincial mechanisms and instruments in place to deal with toxic substance;
- Contents of pollution prevention and virtual elimination plans; and
- A broader range of substances and emitters of toxic substances through the NPRI.

***Minimizing Gaps in Assessment of Biotechnology***

There remains a role for *CEPA 1999* in relation to biotechnology under Part 6 of the Act. Health Canada and the Canadian Food Inspection Agency currently assess many biotechnology products, focusing their considerable expertise on health related assessments. Assessing environmental impacts of biotechnology requires considerable environmentally/ecologically related expertise. These environmental assessments, if conducted, are done with minimal transparency and are not accompanied by the *CEPA 1999* framework of precaution and prevention.

Environment Canada therefore should exercise a more significant role, either through amendments to *CEPA 1999* to include impacts of biotechnology (including seeds and plants) on the environment or through implementation of preventative and precautionary assessments under current federal legislation (*Seeds Act*, *Health and Animals Act*, *Fertilizers Act*, etc.). These assessments should be open to public review.

A needs and alternatives assessment should also take place for products of biotechnology. In large part the necessity of biotechnology is deferred to the market, however this often fails to reflect sustainable development principles (largely through externalizing environmental impacts).[5]

*B.* *Tools for Taking Action*

***Ensure that Legally Enforceable Federal Tools Exist***

Federal legal standards for toxic substances must be created within *CEPA 1999* to maintain accountability and enforceability and to facilitate a societal move towards pollution prevention. Every toolbox needs a hammer, i.e. legally enforceable federal standards that can be upheld by the government and the public.

Under the rubric of duplication, toxic substance regulation, management and prevention of pollution have been delegated or deferred to non-CEPA agencies. The result of this delegation process is circumvention of federally enforceable legal tools to uphold the objectives of *CEPA 1999*.

[5] A stark example of the failure of the market to reflect sustainable practice is the automotive industry's standards for fuel efficiency.



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***Soft Law Tools Needs Assessment***
Soft law tools, such as policies, guidelines and voluntary measures, should remain a part of the CEPA toolbox (in conjunction with binding legal tools) and should retain the departments' support. However, these soft law tools need to be assessed for their efficacy, efficiency, and whether they create accountability on the part of the polluter.

***Where Delegation/Harmonization Occurs Ensure Standards are Legally Enforceable***
If it is the departments' aim to continue to rely on non-CEPA tools for regulation and management of substances, maintenance of the efficacy of CEPA tools requires assurance that the standards will be legally enforceable.

The federal government has a role to ensure basic standards are statutorily enforceable under *CEPA 1999*. Abdication of this federal role to the provinces or non-CEPA agencies, whether through harmonization agreements or otherwise, undermines the role and impact of *CEPA 1999*.

By incorporating all substances into CEPA regulations the public would be assured that other CEPA tools, such as substance assessments, pollution prevention plans, and tools for virtual elimination, would be available. If reliance is placed on the CCME and provincial jurisdictions many of these tools are lost.

***Minimize Reliance on Class Assessments***
The number of substances remaining to be assessed is excessive and an initial step to determining the nature of these substances can be through class assessments. In doing class assessments of substances it is important to apply a more vigorous standard of the precautionary principle as chances of missing harmful substances increase**.**

Class assessments of substances must remain an initial step within a broader assessment process, with individual assessments being prioritized for those substances that are known to be or may be harmful to the environment and human health.

***Support for the Tool of Public Participation***
Public participation should remain a central tool for taking action under CEPA 1999. *CEPA 1999* should facilitate public participation through amendments to the Act, including:

- Implementing intervention and costs provisions that support Environmental Protection Actions under Part 2 of the Act.
- Enabling public participation in the risk assessment process through increased transparency of that process and allowing for public review of risk assessments.
- Ensuring non-CEPA tools incorporate public participation in the process (equal or greater to that available under *CEPA 1999*).

***Using the Tools that Exist***
Tools such as virtual elimination plans have largely gone unused. Amendments on how to best implement virtual elimination may be required. Virtual elimination, as a



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sustainable development goal, should attract further review and implementation by the departments.

*C.* *Fair and Efficient Compliance Promotion and Enforcement*

***Assessment of Use of Compliance and Enforcement Tools***
The Parliamentary Review Committee should review and assess the use, or lack of use, of compliance and enforcement tools under the Act.

Environmental Protection Compliance Orders and Environmental Protection Alternative Measures have seen limited application in the past five years and should be evaluated. This may be as a result of a lack of enforcement activities or a need to advise and promote their use within the Department of Justice and the Courts. The tools may also have legal limitations that minimize their use and this should be evaluated in conjunction with staff counsel or the Department of Justice Canada.

*D.* *Information for Canadians*

*CEPA 1999* has been effective in providing some information for Canadians. Notably the National Pollution Release Inventory constitutes the beginning of a valuable tool for tracking, monitoring and presenting information on substances to Canadians. NPRI reporting requirements are hindered however by maintaining arbitrary reporting triggers that do not necessarily reflect emission activities of significance.

The following may encourage better information for Canadians:

- Amend *CEPA 1999* to increase transparency and access to information. Transparency in risk assessments, pollution prevention plans (P2 plans) and virtual elimination plans are required to ensure the public is able to assess and participate in the pollution prevention mechanisms. The current need to go through the Access to Information process to obtain P2 plans hinders public involvement. The plans and assessments should be publicly available.

- NPRI reporting should capture relevant toxic substances (Schedule 1 substances) and should be triggered by production or release of substances. Current triggers are not based on releases and may exclude significant toxic substance releases from being reported.

- Provide for a substance information clearinghouse. As noted above a central clearinghouse for CEPA and non-CEPA related instruments to promote pollution prevention is required. Assessing whether toxic substances are being managed in an effective and preventative manner is difficult where information regarding substances spans multiple jurisdictions and multiple legal and soft law instruments.



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A more accessible system would provide a database that allows searching by substance, possibly all those listed in Schedule 1, that links to CEPA actions/regulations taken, provincial actions/regulations taken (if any), guidelines, policies, CWS under CCME, and NPRI information. Harmonizing information in this manner is essential for effective public participation and increased transparency and accountability in dealing with toxic substances.

***Information Must be Forthright and Full***

*CEPA 1999* should maintain language that is instructive and reflects the possible impacts on the environment. It has been suggested that the terminology for "toxic" substances be changed to an alternative such as "substance for management" or "restricted substance". The change in substance nomenclature appears to be driven by an effort to create neutrality. However, for substances that cause adverse effects to health and the environment, bioaccumulate or persistent, neutral wording may undermine the principles of pollution prevention and precaution. Use of descriptive wording such as "toxic" supports an underlying goal of avoidance and elimination of these substances.

## 3. Response to Outstanding Issues arising in *Scoping the Issues, CEPA 1999*[6]

The following constitutes the ELC submission regarding outstanding issues that arose from the *Scoping the Issues* document provided by Environment Canada.

| Questions from *Scoping the Issues, CEPA 1999* | Environmental Law Centre Comment |
|---|---|
| 3.2 | CEPA should support objectives of keeping-clean-areas-clean however, this tool should not hinder the federal government from taking proactive steps to legislate prohibitions and restrictions based on best management practices and best available technology for toxic substances. |
| 3.3 | CEPA does not adequately consider the Precautionary Approach nor does it protect the most vulnerable in our population. Both issues speak to a need to incorporate "needs assessments" (as described above) and consideration of alternatives. Further, CEPA should pursue a priority listing process for substances that are known to affect the most vulnerable in our population. |
| 3.7 and 3.8 | When non-CEPA instruments or measures for pollution prevention are pursued there is a need for the federal government to play a strong backstop role. |
| 3.9 | The use of equivalency agreements may hinder and undermine effective implementation of CEPA objectives. If equivalency |

[6] Environment Canada, *Scoping the Issues: Preparation for the Parliamentary Review of the Canadian Environmental Protection Act, 1999*: *Strengthening Legislation for Sustainable Environment, a Healthy Population and Competitive Economy* (Environment Canada, 2004)



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| | agreements are entered they should, at a minimum, maintain accountability, transparency, and public participation at levels equal or greater to those available under CEPA provisions. Flexibility in tailoring agreements should not detract from the underlying principles of public participation, pollution prevention and precaution. |
| 3.10 | The gap created by the definition of "Aboriginal governments" needs to be addressed in a manner that facilitates greater participation by First Nations |
| 3.12 | Promoting Coherence Among Federal Laws and Policies.<br>Regulation of toxic substances should include cradle-to-grave regulation with a focus on preventing products from entering the market that fail to minimize or avoid toxic release. CEPA should interface with other federal authorities by acting as a central regulator for products that contain or release toxic substances. When a product is proposed for market, toxics emission data for its life cycle would be required. Those products that cause excessive pollution or fail to meet minimum standards would then not be allowed on the market. |
| 4.1 | Question 1. Yes, CEPA should require monitoring studies to be done by Health Canada, with the expressed incorporation of the precautionary principle in assessing when action should be taken. |
| 4.2 | The NPRI is open for continue improvement in terms of reliability, efficiency, and the ability to capture significant contributors to Canada's toxic emissions. |
| 4.3 | The powers to gather information should extend to the Minister of Health. |
| 5.1 | To alleviate resource stress on the departments the costs of assessing and gathering scientific information should be borne by the proponents of the use, production and release of substances. This financial onus on the proponent of product use and release reflects a precautionary approach and the polluter pays principle. The cost transfer to proponents of the use and release of these products is also justified as it accounts for the detrimental effects to public capital, i.e. clean water, land and air, costs that are typically externalized.<br><br>Resource capacity must still be maintained to allow auditing and evaluations of proponent driven science. |
| 5.3 | Effective and timely risk assessments are crucial to the initial phase of CEPA implementation. Efficiency targets should be pursued with the precautionary principle in mind, i.e. where there is a lack of information, classes of substances or individual substances should be treated as toxic and listed. |
| 5.4 | The Act needs more express authority to allow for inter-jurisdictional cooperation of the New Substances Program. The authority should be accompanied by requirements to publish the basis for other jurisdiction's approval of substances and evaluation of jurisdictions |



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| | where substances have been prohibited should similarly attract consideration. When adoption of new substances occurs through inter-jurisdictional cooperation it should be subject to public review. |
| 5.5 | CEPA should allow for the removal of a substance from the DSL however this simple legislative prohibition on the use, production and release of the substances should also be considered. Allowing for renewed efforts to have substances brought back to the market, through the new substance assessment process, is inefficient and may result in unnecessary re-assessment of substances formerly prohibited due to significant adverse effects. |
| 6.2 | An alternative approach to listing of substances may better reflect the pollution prevention and precautionary principles. This would allow listing of substances on broader terms than traditional risk assessment. |
| 6.4 | CEPA should allow for the use of economic instruments however there must be a legislative backdrop to enforce pollution prevention. Economic instruments may fail if it is deemed to be cost effective to pollute, particularly with regard to toxic chemicals. |
| 6.5 | A LoQ may not be required for every substance on the virtual elimination list; however, if there is no standard on which virtual elimination is to be measured, enforcement and prosecution of violations becomes more difficult. Standards for measurement are still required for potential violators to have knowledge they are in violation of *CEPA 1999.* |
| 6.6 | Yes, flexibility should be enabled in dealing with changing circumstance regarding import and export permits. |
| 6.7 | Export reduction planning provisions should not be removed, as they remain a useful instrument for pollution prevention. The requirements for waste export reductions plans increase the cost of exporting waste, thus increasing the likelihood for local waste disposal options to be sought. This in turn has economic consequences and ignites public pressure to decrease waste production locally. |
| 6.8 | Emission control standards of other jurisdictions should be assessed on a pollution prevention and precautionary basis. There will likely be times when Canada should exceed emission standards set in the United States (e.g. greenhouse gas emissions). |
| 6.9 | Yes, *CEPA 1999* should include authorities to address fuels as they move throughout the distribution system |
| 6.10 | Yes, CEPA 1999 should be clarified to ensure the Minister is able to prohibit the sale or use of new substances prior to the completion of the assessment. |
| 6.11 and 6.12 | Flexibility in permitting of disposal at sea should be enacted however the permits should not be beyond review. In this regard, the notice requirement, if not maintained, should be replaced by public review provisions that would allow challenges to the terms and duration of permits. |
| 6.13 | Application of section 35 of the *Fisheries Act* should be maintained, |



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| | notwithstanding a CEPA disposal at sea permit. The CEPA process for assessing whether to issue a permit to dump at sea does not involve habitat assessment mechanisms. CEPA regulated and permitted substances may be deleterious to fish. However, the act of dumping substances, deleterious or not, may have broader ecological and habitat implications. Changes to limit the application of s.35 of the *Fisheries Act* would require that there be expressed fisheries habitat assessment provisions incorporated into the CEPA process. Destruction of fish habitat is not analogous to permitting a disposal of a deleterious substance. |
| 6.14 | Yes, *CEPA 1999* should authorize the designation of qualified persons as environmental emergencies officers. |
| 7.1-7.3 | Capacity of CEPA departments to gather, synthesize and disseminate information relevant to toxic substance assessment, minimization and elimination are central to objectives of the Act. These matters are reflected in comments above. |

**Conclusion**

Sustainable Development entails minimization and elimination of use, production and release of toxic substances, particularly when those substances are persistent or bioaccumulate in the environment, or where there is a significant hazard of harm to the environmental or human health.

The Parliamentary Committee Review of *CEPA 1999* is best served by reviewing administration of the Act through a lens of sustainable development. Through this lens it becomes apparent that sustainable administration of *CEPA 1999* requires the following:

1. Maintaining a strong federal role of CEPA Ministries in regulating toxic substances.
2. Promoting increased transparency in regulatory tools.
3. Promoting and facilitating public participation through providing increased access to information and ensuring that *CEPA 1999* tools are available for use.
4. Ensuring legally enforceable standards exist and are enforced.
5. Implementing principles of pollution prevention and precaution through statutorily mandated use of less toxic or non-toxic alternatives and assessment of the necessity of the use, production and release of toxic substances.

We thank you for the opportunity to provide comments to Environment Canada and Health Canada in preparation for the Parliamentary Committee review. If you have any questions regarding our comments, please do not hesitate to contact us at (780) 424-5099.

Yours truly,

Jason Unger
Staff Counsel



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