



The new voice of the  
Labour Environmental  
Alliance Society

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I am writing today to urge you to support legislation that would protect Canadians' right- to-know by requiring mandatory ingredient and hazard labeling of all consumer products that have the potential to expose consumers to a hazardous ingredient.

We all care about protecting ourselves and our families, but without all the facts about toxins in consumer products we use, we are often unable to make informed choices about which product is least dangerous to our health and best suits our needs. The public is now aware that there are toxic chemicals in everyday consumer products including personal care products, toys, water bottles, building and art supplies, pet food, cleaners, kitchenware, and many products intended for babies. These same toxins have also been found in human bodies. And yet, consumers are not being given the information they need to make informed decisions to avoid exposure.

The issue of consumer product labeling is about the public's right to know and to make informed choices. Ensuring we have the information we need to make healthy decisions is both morally and ethically the right thing to do. Public opinion polls conducted for both Toxic Free Canada and the Canadian Cancer Society have demonstrated that an overwhelming majority of Canadians want consumer product labeling legislation. In its Best Practices Report, the National Committee on Environmental and Occupational Exposures of the Canadian Partnership Against Cancer has recommended hazard-based consumer product labeling as a best practice to prevent cancer.

Toxic Free Canada (formerly the Labour Environmental Alliance Society) was founded in 1998 to foster cooperative projects between environmentalists and workers, particularly around issues that link human health and the environment. Our mission is to create alliances and initiatives that promote healthy workplaces, healthy homes and communities and a healthy environment. We promote toxics use reduction based on reducing consumer and workplace use of toxic chemicals and their replacement wherever possible by safer, environmentally-preferable alternatives. We also advocate for policies that will encourage cancer and chronic disease prevention through reduced exposure to environmental and occupational toxins.

In 1988 Canada introduced the Workplace Hazardous Materials Information System (WHMIS), which enshrined workers' right to know what hazardous materials they were being exposed to in the workplace. WHMIS provides the regulatory system in the workplace for the Hazardous Products Act and requires that any hazardous materials intended for use in the workplace be accompanied by a Material Safety Data Sheet. The MSDS identifies any hazardous materials in a product and discloses any chronic health hazards associated with those substances, such as carcinogenicity, reproductive toxicity or mutagenicity.

But no such legislation exists to provide that same information to consumers. The Consumer Chemicals and Containers Regulations (2001), which regulates consumer chemicals under the Hazardous Products Act, provides for labelling of immediate, acute hazards, such as flammability and corrosivity, but does not provide any information about chronic health hazards associated with

repeated use. Nor do the regulations require disclosure of ingredients on product labelling or packaging.

In not providing that information, Canada's regulatory requirements are well behind those of countries throughout the European Union. Labelling regulations in the EU require the disclosure of ingredients in consumer products and the identification, through the use of mandatory risk phrases, of specific chronic health hazards associated with ingredients. Soon, EU countries, along with many others in the world, will be adopting the Globally Harmonized System, which closely parallels the requirements of the EU system in requiring labelling of chronic hazards associated with ingredients.

Canadians have a basic right to know what ingredients are in the products they use and to be advised of the chronic health hazards associated with them. This is a time when new scientific assessments under such programs as Europe's REACH and Canada's own Chemicals Management Plan Challenge Program are revealing the toxic effects of many of the chemicals in common use. Canadians need — and deserve — to be informed about those chemical ingredients when they appear in the products they use.

We urge you to support the development of right to know consumer product labelling legislation that would require:

1. disclosure of all ingredients in consumer products where consumers may potentially be exposed to hazardous ingredients;
2. identification, through recognizable symbols or plain language phrases, of any known hazardous substances to which a consumer may be exposed in using a product, such as carcinogens, reproductive toxins, endocrine-disrupting chemicals or sensitizers
3. establishment of a reference list of hazards, based on existing international standards, set by such agencies as the International Agency for Research on Cancer or the European Commission.

Let's make Canada a world leader on right-to-know consumer product labeling for the health of our citizens and future generations.

Would you contact us and tell us that you support legislation requiring hazard-based labeling and ingredient disclosure on all consumer products in Canada? If you do not support this initiative, would you tell us your reasons?

Thank-you for your attention to this important health and environment issue.

Yours truly

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

Mae Burrows  
Executive Director