

September 20, 2022

Dear Prime Minister Trudeau:

**Re: Environmental Protection Act (Bill S-5)**

The National Council of Women of Canada (NCWC) understands that the Canadian Environmental Protection Act (Bill S-5) will be introduced into the legislature this fall. The bill contained much needed improvements from the original bill from 1999, but it needs to be further strengthened. We recommend the following amendments to the bill:

- a) remove the qualifying language in the right to a healthy environment and develop an implementation framework;
- b) specify in the act the substances that are carcinogenic, mutagenic or toxic to reproduction of all species, to be updated annually, and indicate how they will be addressed;
- c) restore the phrase "List of Toxic Substances" to Schedule 1;
- d) make a pollution prevention plan mandatory and aim for the virtual elimination of inorganic substances such as mercury and lead;
- e) shift to safer alternatives to toxic substances;
- f) clearly define populations vulnerable to toxic substances;
- g) require assessments of aggregate exposures to substances as well as cumulative effects, not only in humans but in nature;
- h) establish clear time frames for assessments so that risk management actions can proceed without delays;
- i) make ambient air quality standards legally binding;
- j) require GMO food labelling;
- k) reverse the burden of proof and require that the proponent show that a new living organism is not toxic.

We believe the addition of these amendments will strengthen the Act and ensure Canadians can enjoy a healthy, safe environment.

Sincerely,

Patricia Leson, President  
National Council of Women of Canada

***The National Council of Women of Canada (NCWC) works in the spirit of truth and reconciliation, acknowledging Canada is the traditional territory of Indigenous and Metis People. We are grateful to join with others in peace and hope, advocating for an improved quality of life for women, children, families, and society.***

**Note:** The original text of this letter was prepared by Mary Potter, 1<sup>st</sup> Vice President, NCWC.

**C:** The Honorable Steven Guilbeault, Minister of Environment and Climate Change