HL15.7.2

CANADIAN ENVIRONMENTAL LAW ASSOCIATION

Toronto Cancer Prevention Coalition

June 22, 2012

Submission to the Toronto Board of Health Re: HL 15.7 Tracking and Reducing Chemicals in Toronto: First Annual ChemTRAC Report

I am submitting remarks today on behalf of the Occupational and Environmental Carcinogens Working Group of the Toronto Cancer Prevention Coalition as their Co-Chair and the Canadian Environmental Law Association legal clinic where I am a researcher. We are here today because we continue to work for more transparency and tools for Torontonians to improve their health by limiting their exposures to harmful substances in our air. We have worked for over a decade for Toronto's Environmental Reporting and Disclosure By-Law that has led to the ChemTRAC program and this milestone first year report on its Phase 1 data.

Each year that we have this database, it will bring us additional information on the sources of pollution to our air and will allow us to be strategic and focus more effectively on measures to target and reduce exposures. These exposures lead to additional cancers, respiratory diseases like the asthma epidemic impacting children in Toronto, and other chronic diseases for workers within these reporting facilities as well as residents in nearby neighbourhoods. Emergency responders like firemen exposed to substances stored at the industrial and commercial sites of fires will benefit from any reductions ChemTRAC can stimulate. Individual Councillors will now be able to work more effectively with local business, commercial and residential constituents to reduce local risks. As well, the City will be able to understand inequities - which neighbourhoods are more vulnerable due to their demographics that compound pollution impacts with poverty impacts.

Our Working Group has received a Live Green grant to work with two such neighbourhoods this year to use the ChemTRAC data to inform them and empower them to understand and act to improve the health of their neighbourhoods and workplaces. You will hear from their representatives of South Riverdale/Beaches and Jane Finch communities today. We have created a neighbourhood toolkit for the public to engage with ChemTRAC. We will be using the ChemTRAC website exploring the data's import for these communities, and will be sharing our experience and recommendations with other communities in Toronto.

The important accomplishment of this ChemTRAC program is that it has required not only the large polluting facilities in Toronto to report but also the small and medium sized facilities ignored by other Federal and Provincial chemical management programs. 55% of the Phase 1 ChemTRAC reporters have never been captured by the Federal National Pollutant Release Inventory. This has stimulated an impetus for these facilities to go beyond the By-Law requirements to report and consider green, sustainable solutions. ChemTRAC has proven to be very educational for those reporting facilities. A lot of credit is due to the efforts of the ChemTRAC staff that have provided a climate where information can be shared as well as providing information and assistance on best practices and models for pollution prevention. I have participated in the sector specific webinars provided by ChemTRAC. I have been

encouraged to hear industry speak to how they see this reporting as part of larger greening efforts to reduce energy and water use and create green jobs.

ChemTRAC is a work in progress. By the end of this year Phase 2 reporting will give us a much more comprehensive neighbourhood by neighbourhood picture. It will be exceedingly important for ChemTRAC data to inform other initiatives as we saw this year when the cumulative air study was released for South Riverdale. It showed that exceedences in air quality were not only attributable to pollution from local facilities but predominately originate from traffic corridors in that neighbourhood. This demonstrates the need to carry out cumulative air studies in other vulnerable Toronto communities, a matter which we also urge you to support today in Agenda item HL15.8

The ChemTRAC Phase 1 June 2012 Report reinforces our concerns that Torontonians continue to be chronically exposed to significant volumes of harmful pollutants. These can be reduced in a number of ways, by better emission controls, by the substitution of safer alternatives, by equipment and process improvements and further regulatory controls. While we have not yet had the time to drill down into the data, we intend to make specific recommendations for actions on substances as well as suggestions on the accessibility of the ChemTRAC data and website.

Our TCPC Working Group which is made up of health, environmental and occupational health and safety advocates, have been approached by many other communities in Ontario, Canada and globally about our campaign that led to the Toronto Environmental Reporting and Disclosure By-law which created ChemTRAC. There are many cities who want to replicate what Toronto Public Health has done in creating this program. These include Vancouver, Sarnia, Windsor, Peterborough, and Hamilton. We also had a visit from a delegation from Australia's Western University to Toronto to learn more about this community right to know initiative. All of these communities are also invested in the success of ChemTRAC as a model they can use.

A serious collaborative effort will be needed to see that this data leads to actions to improve public health. This responsibility not only rests with Public Health but also with the engagement of the effected communities in dialogue with their local facilities, with City Councillors and other City Departments. ChemTRAC has the potential to be an impetuous for Toronto to be a leader in green economic development if this data is now put to good use. We are committed to enabling this and we hope that the Board of Health continues its support and leadership for this unique programme.

Yours truly,

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