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RE: A Discussion Paper on Canada's Food and Consumer Safety Action Plan

I am writing on behalf of the Canadian Institute for Environmental Law and Policy (CIELAP) to provide comments on the Government of Canada's proposal to strengthen and modernize Canada's safety system for food, health and consumer products. CIELAP was founded in 1970, with the mission to provide leadership in the research and development of environmental law and policy that promotes the public interest and sustainability.

The current proposal by the Government of Canada to strengthen and modernize Canada's safety system for food, health and consumer products fails to mention improved standards for reducing and monitoring the use of chemicals and active ingredients (such as endocrine disrupting compounds) in pharmaceuticals and personal care products.

In 2006, CIELAP released a report entitled *There is No "Away" - Pharmaceuticals, Personal Care Products, and Endocrine-disrupting Substances: Emerging Contaminants Detected in Water* – available at <http://cielap.org/pdf/NoAway.pdf>. This report highlighted research showing that between 50% and 90% of the active ingredients in drugs are not absorbed by the human body but instead are excreted. As a result there is a high concentration of contaminants from pharmaceuticals found in wastewater and sewage.

The Government needs to consider the effect of these products and regulate their presence in a variety of products. For example, the 2006 report states that “25 million pounds of antibiotics and other drugs are given to U.S. farm animals, more than eight times the three million pounds used to treat human disease... two thirds of beef cattle for American consumers are given growth hormones in feed or ear implants; these are also

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widely administered in Canadian beef operations.” This is an important concern when regulating the safety of meat products consumed by Canadians. Though we do not yet know all of the effects associated with the use of pharmaceuticals and personal care products, it is clear that the use of antibiotics or antimicrobials can lead to drug-resistant strains of pathogens, known as AMRs.

Many personal care products and pharmaceuticals include chemicals that are able to disrupt the endocrine system of living organisms. These are known as endocrine disrupting compounds (EDCs). These EDCs can mimic or block the action of natural hormones that control many of the body’s functions including growth, development, and reproduction.

Both of these substances are able to withstand treatment in waste treatment facilities, allowing them to remain in sludge, which may then be spread on agricultural land. In addition, these substances are able to enter ground and drinking water potentially affecting human and environmental health (although the effects on humans are currently unclear and require further research).

The negative effects of AMRs and EDCs need to be considered when proposing changes to Canada’s Food and Consumer Safety legislation. Their use in animal products, agricultural production, and pharmaceuticals and personal care products can pose serious risks to the Canadian public and the environment in general.

Thank you for the opportunity to provide input on this discussion paper. Please contact me, or Maureen Carter-Whitney, CIELAP’s Research Director, if you wish to discuss any of these comments further.

Yours sincerely,

A handwritten signature in black ink that reads "Anne Mitchell". The signature is written in a cursive, flowing style.

Anne Mitchell
Executive Director