

From: Meg Sears PhD, Chair Prevent Cancer Now
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To: Standing Committee on Environment and Sustainable Development
Clerk, ENVI@parl.gc.ca

November 28, 2022

**Re: Bill S-5. Modernizing CEPA requires up to date science
Followup of November 25, 2022 testimony**

Dear ENVI Committee members;

Thank you for your hard work on Bill S-5. I'm writing further to our submission, in follow-up to the testimony on November 25, 2022.

We support and would build upon the thorough work of Joseph Castrilli for the Canadian Environmental Law Association, founded on decades of experience with the *Canadian Environmental Protection Act* (CEPA), as well as that of Dr. Charu Chandrasekera from the Canadian Centre for Alternatives to Animal Methods who described non-animal testing methods for substances.

We can only take actions to protect human and environmental health if we recognize characteristics of hazardous chemicals and mechanisms of toxicity. Otherwise these substances stay in commerce, "below the radar." Some characteristics/mechanisms have been prescribed in CEPA, but this list is decades out of date. [Our submission](#) discusses how increases in chronic diseases and cancers seen in Canadians match missing toxicity endpoints, and we recommend expanding CEPA's list to reflect modern science. Our submission supplements the CELA amendments and corresponding definitions.

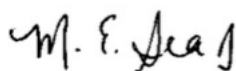
These amendments will bring Canada in line with the European Union, establish us as true leaders in chemicals management, and be the basis for preferred purchasing of products that are safer by design. This testing is available and being further developed and validated using *in vitro* methods by Canadian and international researchers, as Dr. Chandrasekera described.

You will now understand that there are diverse concerns and strengths of expertise among NGOs in Canada. Although the scientists and medical experts with Prevent Cancer Now collaborate from time to time with many others, unlike the coalition, we have provided many detailed submissions to the Chemicals Management Plan and to CEPA reviews by ENVI. The first day of testimony from four representatives of the coalition does not cover our scientific concerns.

This science-based law must rest on modern knowledge and methods. After over 20 years, we implore you to take the necessary time to get this right.

I would be happy to present to the ENVI Committee, or to discuss at our mutual convenience.

Sincerely,



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