

**Discussion and recommendations re. CAN-ASC-2.1 Standard on outdoor spaces:
Public Review Draft**

Prevent Cancer Now is a Canadian national non-profit group focused on primary cancer prevention. Many exposures that contribute to cancer also contribute to environmental sensitivities, so we take this opportunity to make recommendations, to both ends.

Having reviewed the draft standard, we share our rationale to make the following improvements.

5.1.5.4.1 General

Scents beyond Wayfinding

Naturally occurring scents such as the smell of food may be cues for wayfinding. Artificial scents contain volatile organic compounds that may initiate chemical sensitivities or trigger reactions in people with the condition. These chemical mixtures may include ingredients among over 3000 possibilities identified by the International Flavours and Fragrances Association. Their list (for which there is little if any accountability) includes toxic chemicals such as hormone-disrupting phthalates and known sensitizers. For accessibility, scents should not be used artificially to identify spaces, or in cleaning products, or personal care products that are provided such as hand soap, etc.

Patrons should be encouraged or required to be scent-free.

A.7 Rest areas

Power Devices Off (PDO) areas

Rest areas should have good air quality and environmental quality. This includes providing areas with low levels of electromagnetic fields/radiation. To this end, some facilities such as libraries have “Power Device Off” areas. This concept could be readily applied to many venues, such as theatres and classrooms. Powering off electronic devices not only creates accessible spaces for those who experience EHS, it creates healthier spaces for everyone, and reduces distractions and improves attention and learning in educational settings.

7.6.4 Amplification of sound in assembly areas and amphitheatres

Using safest technologies for sound amplification and transmission – infrared technologies

Infrared technology for amplification should be retained, and vendors and manufacturers should be notified that this is the preferred technology. Microwave radiation is biologically active, and just as with biologically active chemicals some individuals have become very sensitive to this exposure. Minimizing microwave radiation (e.g., WiFi, Bluetooth) will accommodate those who are already sensitive to these frequencies (they experience Electromagnetic Sensitivities) and will provide a healthier environment for all patrons.

7.11 Campgrounds

Maintaining safe natural spaces with the minimum of physical, chemical and technological disturbances.

Visiting natural areas can be extremely important for people at all life stages. To maximize these benefits, spaces must remain as “natural” as possible, fostering diverse species and minimizing human impacts. This means using least-toxic products and approaches for daily needs, including chemicals and technologies.

“Wireless radiation” affects not only human health, it affects wildlife (including biodiversity) and vegetation (including trees, potentially increasing flammability). Prevent Cancer Now was a lead in a project outlining these risks and the science behind them – see <https://wirelessenviroimpacts.science>.

Campgrounds should be a gateway to connecting with nature and healing, and substantial wireless infrastructure is not compatible with these outcomes. Campgrounds and parks should have the minimum necessary wireless radiation to maintain safety; however, natural areas are no place for substantial wireless infrastructure, particularly cell towers.

Pesticides

Pesticides are a common initiator and trigger for environmental sensitivities. We heartily support the intention to ban all “cosmetic” (i.e., non-essential, sometimes called “vanity”) pesticides on federal lands. One good example to improve and to build upon was the original Ontario framework (it was weakened by the present government). This policy should be supported with naturalization of landscapes, strategies to prevent pests and the use of least-toxic methods to deal with pests. Signage prior to and following pesticide applications would help individuals to avoid sprayed areas.

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For more information, environmental sensitivities are discussed in three Canadian reports. As the author, I would be happy to discuss with your group:

- Medical Approaches to Environmental Sensitivities (2007, Canadian Human Rights Commission)
<https://www.chrc-ccdp.gc.ca/en/resources/publications/the-medical-perspective-environmental-sensitivities>
- Module 13 – Addressing Chemical Sensitivities for the Canadian Committee for Indoor Air Quality (2019, Canadian Committee on Indoor Air Quality)
<https://iaqresource.ca/wp-content/uploads/2020/09/CCIAQB-Module13-Eng.pdf>
- Module 14 – Indoor Environmental Quality (IEQ) and Productivity in Workplaces/ Achievement in Schools (2020, Canadian Committee on Indoor Air Quality)
<https://iaqresource.ca/module-14-indoor-environmental-quality-ieq-and-productivity-in-workplaces-achievement-in-schools/>

We hope that you find these recommendations helpful. We would be happy to provide further information, or to discuss.

Sincerely,



Meg Sears PhD

meg@preventcancer.ca

613 297-6042

Suggestion Form

Please complete this form and send it with any supporting files to:
ASC.TECHNICAL.COMMITTEES-COMITES.TECHNIQUES.NAC@canada.gc.ca

Contact Information

*First name:

*Last name:

*Email:

About You

Which of the following describe you (select all that apply):

- I am a person with a disability
- I am a caregiver, partner or close relative of a person with a disability
- I do not identify as having a disability
- I prefer not to say

About Your Response

*Who are you representing in this response?

- I am representing myself or another person
- I am representing an organization

*May we contact you to learn more about your suggestion?

- Yes, you may contact me.
- No, do not contact me.

Region

*What is your Postal code? (if you are representing an organization, provide the postal code for the organization office you are associated with):

Organization Information

If you are not representing an organization, please skip this section and go to Suggestion 1.

What is the name of your organization?

Prevent Cancer Now

Which of the following best describes your organization? (choose all that apply)

- Academic and research bodies
- Non-governmental organizations
- Government and authorities having jurisdiction
- Labour and unions
- Standards development bodies
- Federally-regulated industries and workplaces
- Federally-regulated public sector, and territorial private-sector firms and municipalities
- Business and industry
- Non-profit

If applicable, what sector does your organization represent?

Does not apply to my organization
Accommodation and Food Services
Administrative and Support and Waste Management and Remediation Services
Agriculture, Forestry, Fishing and Hunting
Arts, Entertainment, and Recreation
Construction
Educational Services
Finance and Insurance
Health Care and Social Assistance
Information

Adding Suggestions

Continue to the next page to begin adding your suggestions.

For each suggestion, you will need five things; four are required and one is optional:

- 1) The section number (required)
- 2) What we should change (required)
- 3) What we should change it to (required)
- 4) Why you think we should change it (required)
- 5) Any related files that you want to share

Suggestion 1

*What kind of suggestion are you making?

- Editorial such as spelling, grammar, formatting and accessibility
- Technical such as dimensions or application of the standard
- General comments on the overall standard or a section such as things that are missing

*Section Number (e.g., 4.7.6)

5.1.5.4.1 General

*What we should change

– add a recommendation to complement the following recommendation: Cues in the environment (e.g., scent, light, auditory, touch) should be used to provide orientation for a person who is blind or partially sighted.

*What we should change it to

Naturally occurring scents such as the smell of food may be cues for wayfinding, but scents should not be used artificially to identify spaces, or in cleaning products, or personal care products that are provided such as hand soap, etc. Use of fragranced/scented products should be minimized by choosing scent-free products for cleaning/maintenance, and by requiring staff to use scent-free laundry and personal care products. Scent-free signage for visitors and staff education are recommended.

*Why you think we should change it

Artificial scents contain volatile organic compounds that may initiate chemical sensitivities or trigger reactions in people with the condition. These chemical mixtures may include ingredients among over 3000 possibilities identified by the International Flavours and Fragrances Association. Their list (for which there is little if any accountability) includes toxic chemicals such as hormone-disrupting phthalates and known sensitizers. For accessibility, scents should not be

If you have files with supporting information, please describe them here
discussion and references in submission

You can save your form or continue to add suggestions or submit your form by email. Be sure to include any supporting documents. If you are using Acrobat Reader, you can use the buttons below.

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Suggestion 2

*What kind of suggestion are you making?

- Editorial such as spelling, grammar, formatting and accessibility
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- General comments on the overall standard or a section such as things that are missing

*Section Number (e.g., 4.7.6)

A.7 Rest areas

*What we should change

Add issue of powering off devices

*What we should change it to

Establish Power Devices Off (PDO) areas. Rest areas should have good air quality and environmental quality. This includes providing areas with low levels of electromagnetic fields/radiation.

*Why you think we should change it

Powering off devices - is a simple means to greatly reduce ambient electromagnetic radiation, and is already implemented in some public facilities such as libraries and Ontario service centres. it creates healthier spaces for everyone, and reduces distractions and improves attention and learning in educational settings.

If you have files with supporting information, please describe them here

This is described further in references in the submission attached with this, in the submission email.

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Suggestion 3

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*Section Number (e.g., 4.7.6)

F.6.4 Amplification of sound in assembly areas and amphitheatres

*What we should change

modify discussion of amplification technologies

*What we should change it to

Using safest technologies for sound amplification and transmission – infrared technologies

Infrared technology for amplification should be retained, and vendors and manufacturers should be notified that this is the preferred technology.

*Why you think we should change it

Microwave radiation is biologically active, and just as with biologically active chemicals some individuals have become very sensitive to this exposure. Minimizing microwave radiation (e.g., WiFi, Bluetooth) will accommodate those who are already sensitive to these frequencies (they experience Electromagnetic Sensitivities) and will provide a healthier environment for all patrons.

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See references in submission attached to the email

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Suggestion 4

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*Section Number (e.g., 4.7.6)

7.11 Campgrounds

*What we should change

Add missing topics

*What we should change it to

Maintaining safe natural spaces with the minimum of physical, chemical and technological disturbances.

Campgrounds should be a gateway to connecting with nature and healing, and substantial wireless infrastructure is not compatible with these outcomes.

Campgrounds and parks should have the minimum necessary wireless radiation to maintain safety; however, natural areas are no place for substantial wireless infrastructure, particularly cell towers.

*Why you think we should change it

Visiting natural areas can be extremely important for people at all life stages. To maximize these benefits, spaces must remain as “natural” as possible, fostering diverse species and minimizing human impacts. Use least-toxic products and approaches for daily needs, including chemicals and technologies. “Wireless radiation” affects not only human health, it affects animals and vegetation (including trees, potentially increasing flammability). See <https://wirelessenviroimpacts.science>.

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