

July 27, 2015

The Honourable Leona Aglukkaq
Minister of the Environment
Environment Canada
Les Terrasses de la Chaudière
10 Wellington Street, 28th Floor
Gatineau, Quebec
K1A 0H3

The Honourable Rona Ambrose
Minister of Health
Health Canada
Brooke Claxton Building, Tunney's Pasture
Postal Locator: 0906C
Ottawa, Ontario
K1A 0K9

Transmission by e-mail:

Minister@ec.gc.ca
leona.aglukkaq@parl.gc.ca
rona.ambrose@parl.gc.ca
minister.ministre@hc-sc.gc.ca

Dear Ministers Aglukkaq and Ambrose:

Joint NGO Letter Urging Government Action on Triclosan (CAS RN: 3380-34-5)

We – the following groups listed below - are urgently writing to inquire about the status of Triclosan (CAS RN: 3380-34-5) under the *Canadian Environmental Protection Act, 1999* (CEPA 1999). We are deeply concerned that the assessment on triclosan has not been finalized and released to the public. The NGO community urges the government of Canada to finalize its decision on Triclosan and find the chemical toxic under the CEPA 1999.

According to the posting on Canada's Chemicals Management Plan website, the draft risk assessment on Triclosan was completed in 2012. It's been almost 3.5 years since that draft assessment was released. Since its release there have been very limited updates to the public on the assessment. The conclusion of the draft assessment advises the government to declare Triclosan (CAS RN: 3380-34-5) to be toxic and add this chemical to the Toxics Substances List (Schedule 1) under the CEPA 1999.

On November 27, 2014, over 50 Canadian based environmental and health non-profit organizations submitted a statement urging the government to finalize the conclusion of toxicity and take necessary measures to ensure a phase out of this chemical in all

products (see attachment).¹ Leading scientists and health professionals have called for urgent action on Triclosan due to rising antibiotic resistance and the ongoing toxic effects in the environment – particularly in Canadian lakes and rivers.²

We want to reiterate our support for the Canadian government to proceed with this designation of toxicity and prohibit Triclosan in all products. The NGO community also seeks that a mandatory alternatives assessment be conducted to ensure informed substitution if chemical biocides can be shown to be necessary in specific applications. The use of alternative assessment seeks to avoid regrettable substitutions for Triclosan, including Triclocarban (CAS RN: 101-20-2).

Further delays to the final assessment of Triclosan are unacceptable given the toxicity impacts associated with Triclosan. The government has sufficient evidence to conclude that Triclosan is toxic. The lack of progress on this file will mean the continued release of Triclosan into important aquatic ecosystems such as the Great Lakes – St. Lawrence River Basin and other water bodies across the country.

We urge you to take the necessary steps to finalize the assessment immediately and proceed with regulatory measures prohibiting the use of Triclosan.

The NGO Triclosan Statement of November 27, 2014 included a series of recommendations:

- 1. Officially declare Triclosan (CAS RN: 3380-34-5) to be toxic and add Triclosan to the Toxic Substances List (Schedule 1) under CEPA, 1999;***
- 2. Implement a phase-out of Triclosan in all consumer and institutional products, with priority given to cleaning and personal care products, and require mandatory product labelling during the phase-out period;***
- 3. Adopt a framework of Informed Substitution and ensure that Triclocarban is prohibited so that industry does not adopt a regrettable substitution; and,***

¹ Environment and Health Groups' Statement on Triclosan: Call on Canadian Government to Prohibit Triclosan in All Products dated November 27, 2015. Over 50 Environmental and Health non-governmental organizations signed this document.

² See, for example, the joint statement of the Canadian Partnership for Children's Health and Environment (CPCHE) and Drs. Bruce Lanphear and Robin Walker: <http://www.healthyenvironmentforkids.ca/news-info/cpche-urges-federal-government-take-action-antibacterial-chemical-triclosan>.

4. ***Require transparent alternatives assessments for safer substitutes if chemical biocides are shown to be necessary in specific cases.***

Thank you for your consideration of our request and we look forward to your response.

Yours truly,

Action cancer du sein du Québec/ Breast Cancer Action Québec (QUÉBEC, CANADA)

Jennifer Beeman, Directrice générale; tel.: 514-483-1846; e-mail: jennifer.beeman@acsqc.ca

Alaska Community Action on Toxics (ALASKA, USA)

Pamela Miller, Executive Director; tel.: 907-222-7714; e-mail: pamela@akaction.org

Alliance for the Great Lakes (ILLINOIS, USA)

Molly M. Flanagan, Vice President, Policy; tel.: 312-445-9741; e-mail: mflanagan@greatlakes.org

Benedictine Sisters of Erie PA (PENNSYLVANIA, USA)

Pat Lupo, OSB; tel.: 814-490-3108; e-mail: plupo@neighborhoodarthouse.org

Breast Cancer Action Manitoba (MANITOBA, CANADA)

Louise Schoenherr; tel.: 204-257-2649; e-mail: kschoenh@mymts.net

Canadian Association of Physicians for the Environment (ONTARIO, CANADA)

Kapil Khatter, Board Member; tel.: 613-864-9591; e-mail: khatter7@gmail.com

Canadian Coalition for Green Health Care (ONTARIO, CANADA)

Kent Waddington, Communications Director; tel.: 613-756-0435; e-mail: Kent@greenhealthcare.ca

Canadian Environmental Law Association (ONTARIO, CANADA)

Fe de Leon, Researcher; tel.: 416-960-2284; e-mail: deleonf@cela.ca

Canadians for A Safe Learning Environment (CASLE) (NOVA SCOTIA, CANADA)

Karen Robinson; tel.: 902-457-3002; e-mail: info@casle.ca

Chemical Sensitivities Manitoba (MANITOBA, CANADA)
Sandra Madray; tel.: 204-256-9390; e-mail: madray@mymts.net

Citizens Environment Alliance of southwestern Ontario (ONTARIO, CANADA)
Derek Coronado, Coordinator; tel. 519-973-1116; e-mail: dcoronado@cogeco.net

Citizens for a Safe Environment (CSE) of Toronto Foundation Inc. (ONTARIO, CANADA)
Karen Buck, President; tel.: 416-690-7593; e-mail: karenbuck@rogers.com

Citizens' Network on Waste Management (ONTARIO, CANADA)
John Jackson; tel.: 519-744-7503; e-mail: jjackson@web.ca

Clean Water Action Minnesota (MINNESOTA, USA)
Deanna White; tel.: 612-627-1512; e-mail: dwhite@cleanwater.org,

Clean Production Action (NORTH AMERICA)
Beverly Thorpe, Consulting Co-Director; tel.: 647-341-6688; e-mail: bev@cleanproduction.org

Concerned Walkerton Citizens (ONTARIO, CANADA)
Bruce Davidson, Chair; tel.: 519-881-0884; e-mail: cwc@bmts.com

Conservation Council of New Brunswick (NEW BRUNSWICK, CANADA)
Lois Corbett, Executive Director; tel.: 506-458-8747; e-mail: lois.corbett@conservationcouncil.ca

Crooked Creek Conservancy Society of Athabasca (ALBERTA, CANADA)
Rosemary Neaves, Chair; tel.: 780-675-9197; e-mail: reneaves@telus.net

Ecology Center (MICHIGAN, USA)
Rebecca Meuninck, Environmental Health Campaign Director; tel.: 734-369-9278; e-mail: rebecca@ecocenter.org

EcoSuperior Environmental Programs (ONTARIO, CANADA)
Ellen Mortfield, Executive Director; tel: 807-624-2145; e-mail: ellen@ecosuperior.org

Environmental Defence (CANADA)
Maggie MacDonald, Program Manager; tel.: 416-323-9521; e-mail: mmacdonald@environmentaldefence.ca

Environmental Health Association of Nova Scotia (EHANS) (NOVA SCOTIA, CANADA)
Alison Petten; tel.: 902-454-0989

Federation of Ontario Cottagers' Associations (FOCA) (ONTARIO, CANADA)
Terry Rees, Executive Director; tel.: 705-749-3622; e-mail: trees@foca.on.ca

Freshwater Future (ONTARIO, CANADA)
April Wepler; tel.: 647-215-7992; e-mail: april@freshwaterfuture.org

Friends of Cathedral Grove (BRITISH COLUMBIA, CANADA)
David F. Boehm, B. Sc.; e-mail: dfboehm@shaw.ca

Georgian Bay Association (ONTARIO, CANADA)
Anne Stewart; tel.: 705-366-2148; e-mail: astewart.anne@gmail.com

Georgia Strait Alliance (BRITISH COLUMBIA, CANADA)
Christianne Wilhelmson, Executive Director; tel.: 250-753 3459; e-mail:
gsa@georgiastrait.org

Green Science Policy Institute (CALIFORNIA, USA)
Arlene Blum, PhD, Executive Director; tel.: 510-898-1704 or 510-898-1739; e-mail:
arlene@arleneblum.com

Grey Bruce Sustainability Network (ONTARIO, CANADA)
Bruce Davidson, Chair; tel.: 519-881-0884; e-mail:
cwc@wightman.ca

Healthy Community Partners - Partenaires pour une communauté saine (PRINCE EDWARD ISLAND, CANADA)
David Daughton; tel.: 902-626-7399; e-mail: ddaughton@gmail.com

Healthy Legacy Coalition (MINNESOTA, USA)
Kathleen Schuler; tel.: 612-767-2444; e-mail: kathleen@conservationminnesota.org

KANCED (KAN Centre for Environment and Development) (ONTARIO, CANADA)
Olga Speranskaya; tel.: 647-868-9526; e-mail: info@kanced.org

Learning Disabilities Association of Canada (LDAC)/ Association Canadienne des troubles d'apprentissage (ACTA) (OTTAWA, CANADA)
Barbara McElgunn, Health Policy Advisor; tel.: 613-238-5721; e-mail: mcelgunnb@rogers.com

Lake Ontario Waterkeeper (ONTARIO, CANADA)
Mark Mattson; tel.: 416-861-1237; e-mail: admin@waterkeeper.ca

National Network on Environments and Women's Health, York University (ONTARIO, CANADA)
Anne Rochon Ford; tel.: 416-736-2100, ext 20713; e-mail: annerf@yorku.ca

North Saskatchewan Riverkeeper (ALBERTA, CANADA)

Brigitte Dreger; tel.: 647-678-0746; e-mail: glenn@saskriverkeeper.ca

Nova Scotia Environmental Network (NOVA SCOTIA, CANADA)

Sheila Cole; tel.: 902-444-4291; e-mail: sheilacole108@yahoo.ca

Ontario Rivers Alliance (ONTARIO, CANADA)

Linda Heron, Chair; tel.: 705-866-1677; e-mail: LindaH@OntarioRiversAlliance.ca

Ottawa Riverkeeper/Sentinelle Outaouais (ONTARIO, CANADA)

Meredith Brown, Riverkeeper and Executive Director/ Sentinelle et Directrice générale; tel.: 613-321-1120; e-mail: keeper@ottawariverkeeper.ca

The Oxford Coalition for Social Justice (ONTARIO, CANADA)

Bryan Smith, Chair; tel.: 519-456-5270; e-mail: bryasmit@oxford.net

Pesticide Action Network North America (CALIFORNIA, USA)

Paul Towers; tel.: 916-588-3100; e-mail: ptowers@panna.org

Prevent Cancer Now (ONTARIO, CANADA)

Meg Sears PhD, Co-chair; tel.: 613 297-6042; e-mail: meg@preventcancer.ca

Quill plains Chapter, Council of Canadians (SASKATCHEWAN, CANADA)

Margaret Lewis, Acting Contact/Acting Chair; tel.: 306-647-2132; e-mail: readymade@sasktel.net

Reach for Unbleached Foundation (BRITISH COLUMBIA, CANADA)

Michael Cooke, chair; e-mail: michael@sunwindsolar.com

Saskatchewan Network for Alternatives to Pesticides (SNAP) (SASKATCHEWAN, CANADA)

Paule Hjertaas; tel.: 306-584-2835; e-mail: dp.hjertaas@sasktel.net

Save The River / Upper St. Lawrence Riverkeeper (NEW YORK, USA)

Lee Willbanks, Executive Director; tel.: 315-686-2010; e-mail: lee@savetheriver.org

Synergie Santé Environnement (QUÉBEC, CANADA)

Jerome Ribesse; tel.: 514-885-6178; e-mail: jribesse@ssequebec.org

Toronto Environmental Alliance (ONTARIO, CANADA)

Heather Marshall, Toxics Campaigner; tel.: 416-596-0660; e-mail: heather@torontoenvironment.org

Wallaceburg Advisory Team for a Cleaner Habitat (WATCH) (ONTARIO, CANADA)

Kris Lee, Chair; tel.: 519-892-3813; e-mail: lee(at)kent.net

Watershed Sentinel Educational Society (BRITISH COLUMBIA, CANADA)

Delores Broten; e-mail: editor@watershedsentinel.ca

Women's Healthy Environments Network (ONTARIO, CANADA)

Jenise Lee, Chair; tel.: 416-928-0880; e-mail: office@womenshealthyenvironments.ca

Individuals:

Dr. Gail Krantzberg, Professor and Director, Engineering and Public Policy Program, Booth School of Engineering Practice, McMaster University (ONTARIO, CANADA); tel.: 905-525-9140 ext. 22153; e-mail: krantz@mcmaster.ca

attachment