Written Submission for the Pre-Budget Consultations in Advance of the Upcoming Federal Budget

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August 6, 2020

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List of Recommendations

Recommendation 1: That the government make national Pharmacare a priority to ensure Canadians have equitable access to the medications they need.

Recommendation 2: That the government strengthen CEPA by:

a) Health Canada and ECCC revisiting the processes of hazard identification and risk assessment, with endocrine disruption considered to be an inherently toxic effect; and

b) Health Canada and Environment and Climate Change Canada publish a policy framework and updated definition of vulnerable populations in the context of chemicals management.

Recommendation 3: That the government develop a roadmap to meet or exceed Canada's commitment to phase out fossil fuel subsidies by 2025, and divert these funds to the clean energy sector.

Recommendation 4: That the government implement energy retrofit programs to provide financial incentives for energy efficient retrofits at a cost of $215 million, plus $100 million in skills training.

Recommendation 5: That the government conduct a formal feasibility review recent studies regarding income support and develop a plan to implement policies that will reduce economic inequities in Canada.

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Background

The *Foundation for Resilient Health* and the *Canadian Network for Human Health and the Environment* are science-based environmental health organizations. We provide the following recommendations to **restart the Canadian economy** as it recovers from the COVID-19 pandemic, while also **resolving inequities** that are a root cause of poor health. **Human health, the economy, and our environment are inextricable linked**. A healthier, more resilient Canadian population will enable all Canadians to live better lives, contribute to our country, and be adaptable to future challenges.

Justification for Recommendations

Recommendation 1: That the government make national Pharmacare a priority to ensure Canadians have equitable access to the medications they need.

The United Nations has declared that all nations should ensure universal and equitable access to pharmaceuticals; yet Canada remains the only high-income country with a universal health care system that excludes medically necessary prescription drugs. The federal government's Budget 2019 included the first steps toward national Pharmacare, but **more needs to be done to ensure affordable medicine is accessible for all Canadians.**

Implementing pharmacare will allow Canada grow our world-class health system. **Chronic diseases cost Canada about $190 billion per year** in treatment and lost productivity[i]. Currently, one in ten Canadians have difficulty paying for prescription medications (even with health benefits coverage)[ii]. Pharmacare will reduce the financial burden on individual Canadians and employers, resulting **in increased spending power to support our economy**. Individuals will be better able to **contribute to our country** as their burden of disease is decreased.

Recommendation 2: Strengthen CEPA

Canadians are exposed to hundreds of chemicals daily in our food, our air and water, in consumer products, and occupational exposures. Chemicals exposure is increasingly linked to the rise of chronic illness in Canada, which are risk factors for severe illness from COVID-19 and other pandemics. **Investment in pollution prevention will reduce the country's burden of disease and foster resilience in the face of public health crises such as pandemics.**

The **current chemicals assessment approach has fallen out of step with modern science** in two main facets of assessment and risk management:

a) Assessment of endocrine disruption effects, following the classical "the dose makes the poison" assumption, which simply is not valid for endocrine disruption chemicals; and

b) Inclusive definition of vulnerable populations.

The current chemical risk assessment approach is centred on the classical "the dose makes the poison" assumption, where the toxic effect is assumed to be related to the amount of the chemical a person is exposed to, and a lower, threshold or "safe" amount is assumed. These dose calculations are based on a number of exposure assumptions which fail to capture reality that some people are more sensitive to a chemical based on genetics or underlying health conditions, and some people are exposed to more chemical than the general population due to their occupation or where they live (for example near industrial facilities where chemical emissions are higher). These **underlying inequities contribute to overall poor health**, and limit people's resilience to health challenges.

The first step toward a policy framework on vulnerable populations was conducted in 2018-2019. A definition of vulnerable populations in line with current international was proposed[iii], and a public consultation process was held[iv]. Some consultation gaps were identified, thus it **is time to complete this consultation process and develop a robust definition of vulnerable populations for chemicals assessment and management.**

Additionally, current science reveals that some chemicals can affect the neuro-endocrine system even at very low exposures, and as such, **no "safe" dose exists**. Even small exposures to these endocrine disruption chemicals have been associated with health problems that are not immediate or obvious, such as **learning difficulties, ADHD, fertility problems, diabetes, and cancer**. It is more precautionary, to **deem endocrine disrupting chemicals as "inherently toxic"**[v].

Adopting a chemical assessment approach based on hazard (in line with current science, especially for endocrine disruption chemicals) will **provide opportunities for research, innovation, and new product development** in the green chemicals industry, while protecting Canadians' health and environment

Recommendation 3: : That the government develop a roadmap to meet or exceed Canada's commitment to phase out fossil fuel subsidies by 2025, and divert these funds to the clean energy sector.

Efforts to support worked in hard-hit industries such as the oil and gas sector cannot come at the expense of the critical need to **transition to a low-carbon economy**. The government should divert government support away from fossil fuel subsidies, tax provisions, and credit support and **put clean energy at the heart of stimulus plans.** Investing in exceeding our climate targets **will increase clean energy jobs sevenfold by 2050**[vi].

Reducing greenhouse gases will improve human health. Thousands of hospital visits and more than 14,000 premature deaths each year in Canada are attributable to air pollution[vii]. Increased healthcare costs, missed days of work, and reduced worker productivity related to **air pollution costs the Canadian economy billions of dollars per year**[viii]. Investing in the green economy and reducing greenhouse gas emissions will save healthcare costs *and* **increase Canadians' contribution to our economy.**

Recommendation 4: Financial incentives for energy efficient retrofits

Although COVID-19 represents a serious public health risk, many more **lives are at risk due to climate change**. A significant source of emissions (>20%) comes from burning fossil fuels to heat and provide electricity to homes and public buildings[ix]. Canadians are worried about climate change[x]; however, with the financial hardships of the COVID-19 crisis, individuals' capacity to make changes to their homes is limited.

In their 2019 election platform, the **Liberal government committed to making energy efficient homes more affordable**. We recommend bringing back the popular and successful ecoENERGY Retrofit program, providing grants to Canadians to increase their homes' efficiency. "The ecoENERGY Retrofit – Homes program successfully **created jobs** across Canada and helped homeowners save an average of 20 percent on their home energy use" (Government of Canada, 2014)[xi]. Such investments will **empower Canadians contribute to our country's climate action that is not limited by their income**.

The cost to implement the proven ecoENERGY Retrofit program at the scale of 2011-2012, adjusted for inflation, is estimated at $215 million. Additionally, the Liberal government committed to an additional $100 million in skills training, to ensure there are enough qualified workers to keep up with energy audits, retrofits, and net-zero home construction.

Recommendation 5: formal feasibility review of recent studies regarding income support and develop a plan to implement policies that will reduce economic inequities in Canada

The COVID-19 crisis demonstrated that many Canadians struggle with underemployment, job loss and other situations that make it **difficult to meet their basic needs, participate in society, and live with dignity**. The CERB effectively acted as a safety net for Canadians who needed it during COVID-19, but the need for income support will not end as we recover from COVID-19.

The federal government already provides income support to families with children under 18, to seniors over 65, and persons living with a disability. The COVID-19 crisis has demonstrated that the need exists in beyond these selected populations.

Numerous studies and pilot scale testing have been conducted regarding the feasibility of income support, such as universal basic income as an important step toward poverty reduction[xii], [xiii]. **It is time for government action** to implement a to reduce economic inequities that underlie poor health, which will result in **savings in downstream health and social costs.**

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