

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

**By: Foundation for Resilient Health and  
Canadian Network for Human Health and the Environment**

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**Foundation for Resilient Health  
Fondation pour la Santé Résiliente**



**CNHHE  
RCSHE**

## List of Recommendations

**Recommendation 1:** That the government allocate \$18 billion to take strong action on climate change by meeting or exceeding Net Zero targets by:

- a) Phasing out ineffective fossil fuel subsidies and diverting these funds to the clean energy sector and a just transition for workers to train for new opportunities.
- b) Accelerating the adoption of low carbon commuting by investing in public transportation, point of sale incentives for personal vehicles, and developing the nation's charging network.

**Recommendation 2:** That the government prevent climate change mitigation actions from increasing air pollution by:

- a) Including radon mitigation as an eligible expense in the existing energy efficiency retrofit rebate program. No change to the 2021 budget of 4.4 billion is required to make this modification. in EE retrofits (no \$ change from 2021 budget of 4.4 billion for deep home retrofits interest free loan)
- b) Mandating Health Canada and/or Environment and Climate Change Canada to reduce woodsmoke pollution in Canada to ensure the health and climate implications of biomass as an alternative energy source are holistically considered. Introducing a public education and rebate program at the same scale as the energy efficiency rebates (4.4 billion) to incentivize low carbon / clean home heating.

**Recommendation 3:** That the government allocate \$3.5 billion<sup>i</sup> to launch a national pharmacare system to support health and resilience.

**Recommendation 4:** That the government prevent illness and protect the environment with stronger laws on toxins and pollution by urgently discussing and implementing measures of Bill S-5 to modernize the Canadian Environmental Protection Act, and further measures to modernize CEPA in line with current science.

**Recommendation 5:** That the government eliminate poverty by investing \$100 billion into a recovery basic income, which would reduce healthcare and criminal justice costs, and enable Canadians to participate in the economy.

## Preamble

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 to improve the health of Canadians. Human health, the economy, and our environment are inextricably 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.

### **Recommendation 1: Take Strong Action on Climate Change**

While COVID-19 has been a significant public health crisis worldwide, climate change is the biggest threat to public health of the 21st Century<sup>ii</sup>. **Investing in exceeding our climate targets will increase clean energy jobs sevenfold by 2050<sup>iii</sup> and save the Canadian economy billions of dollars per year<sup>iv</sup> in healthcare costs, missed days of work, and reduced worker productivity related to air pollution.**

Between 2020 and 2021, government increased its spending to meeting Net Zero targets by 15%. There is an urgent need to accelerate action on climate change and as such, we recommend increasing climate action spending by 30% over 2021 by allocating \$18 billion to meeting or exceeding Net Zero targets.

According to a 2019 Abacus Data poll<sup>v</sup>, 8 in 10 Canadians support a shift toward clean and renewable energy. We suggest the following strategies to create jobs, save Canadians money and fight climate change.

- A) **Phase out ineffective fossil fuel subsidies** without delay, and divert these funds to the clean energy sector. The 2022 budget should include a roadmap to eliminate these subsidies<sup>vi</sup> and a plan for fossil fuel workers to train for new opportunities and prepare for the jobs of tomorrow.
- B) **Accelerate investment in low carbon transportation.** The need to transition our transportation sector is urgent, but a number of barriers remain. Increasing investments in rebates for personal vehicles, electrifying public transit, and strengthening the nation's charging network are critical components of this transition. An Abacus poll conducted by the Canadian Lung Association identified that 84% of Canadians were supportive of incentives to purchase electric vehicles and investment in their infrastructure. The government can help Canadians adopt EVs as their next vehicle purchase by providing price incentives<sup>vii</sup> to bridge the current price gap. This investment will accelerate Canada's green transformation and will support the Prime Minister's mandates to the Ministers of Environment and Climate Change, Innovation, Science and Industry, Transport, and Natural Resources to advance zero-emission vehicle targets.

## **Recommendation 2: prevent climate change mitigation actions from increasing air pollution**

Actions taken on climate change should not result in additional health risks. Two main policy areas currently implemented by the Government of Canada including energy efficient retrofits and climate friendly heating alternatives require a holistic approach.

- A. **Include radon mitigation in Energy Efficiency Rebate Programs.** Budget 2021 introduced a deep home energy retrofits program to lower Canadian's energy use and take action on climate change. This \$4.4 billion program is an important step in reducing greenhouse gases and protecting public health from climate change, however increasing energy efficiency by increasing the airtightness of a home has the unintended negative consequence of increasing radon gas concentrations. Radon gas is the second leading cause of lung cancer after smoking. As such, energy efficiency incentives should be coupled with radon mitigation.
- B. **Mandate a reduction in woodsmoke.** Biomass burning has (incorrectly) been touted as a climate friendly or carbon neutral home heating option. In fact, burning of wood releases more greenhouse gases than natural gas, oil, or coal<sup>viii</sup> Additionally, black carbon, a component of PM<sub>2.5</sub>, poses both health risks and climate risks as a short-lived climate pollutant. Residential wood burning is a major source of black carbon in Canada, accounting for 24% of national emissions in 2019<sup>ix</sup>. At present, reducing woodsmoke is not clearly mandated at the federal level; it is not stated in Health Canada or Environment and Climate Change Canada's mandates. Though a number of strategies (e.g. Pan Canadian Framework on Clean Growth and Climate Change and Canada's Strategy on Short-Lived Climate Pollutants) touch on biomass burning, clear direction on the health risks of PM<sub>2.5</sub> and the climate implications of black carbon emitted is essential. Introducing a public education and rebate program at the same scale as the energy efficiency rebates (\$4.4 billion) to incentivize low carbon / clean home heating is an effective way to begin to address this public health concern.

## **Recommendation 3: Implement National Pharmacare**

The government should fulfill the mandates of the Ministers of Health and Intergovernmental Affairs and build a national pharmacare system. Studies and implementation strategies have been completed. It is time for action.

*A Prescription for Canada: Achieving Pharmacare for All* indicates the cost to launch national pharmacare starting with universal coverage for essential medicines is \$3.5 billion in 2022, and would reach \$15.3 billion annually by 2027 as the program expands. With **chronic diseases costing Canada about \$190 billion per year in treatment and lost productivity<sup>x</sup>**, the price tag for pharmacare is justifiable and **saves money**.

It is reported that one in ten Canadians have difficulty paying for prescription medications (even with health benefits coverage)<sup>xi</sup>. These figures may be even higher now following job

losses and sick time taken during the pandemic, and those suffering from Long COVID. Pharmacare will ensure Canadians can afford the medications they need, reduce the financial burden on individual Canadians and employers, and result in increased spending power to support our economy

#### **Recommendation 4: Prevent illness with stronger laws on toxins and pollution**

The government should fulfill its commitments as promised to Canadians in the September 2021 speech from the throne, and as mandated by the Prime Minister to the Ministers of Health and Environment and Climate Change to modernize the Canadian Environmental Protection Act (CEPA). CEPA is a critical legislation to protect the environment and human health.

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. Biodiversity in Canada is threatened. A healthy biodiverse environment is foundational to the resilient health of Canadians. Pollinators and soil microbiota are essential to our food supply. Wetlands cleanse water. Plants release oxygen. Our health and our environment are inextricably linked.

In November, 2021 Bill S-5<sup>xii</sup> was introduced into the Senate with some important, albeit modest, modernizations to CEPA. Second reading of Bill S-5 should be added to the order paper without delay, and additional revisions to bring the legislation in line with current science and international best practices for environmental protection. Additional modifications to CEPA are required to adequately protect the environment and human health in the areas of vulnerable populations, endocrine disrupting chemicals, and enshrining the precautionary principle throughout the legislation.

#### **Recommendation 5: Improve Income Support Programs**

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<sup>xiii, xiv</sup>. We support FINA's recommendation<sup>xv</sup> that government extend income support programs and consider the implementation of a universal basic income. Reducing economic inequities that underlie poor health will result in **savings in downstream health and social costs**.

Respectfully submitted,



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