



March 19, 2002

Ms. M.E. Meek
Acting Chief
Health Canada
Existing Substances Section
Tunney's Pasture
Ottawa, Ontario
Canada K1A 0L2

Dear Ms. Meek:

Re: NGOs Request for information on Domestic Substances List

Thank you for your response of November 26, 2001 regarding our request for information concerning Health Canada's progress on developing a categorization and screening framework for Canada's Domestic Substances List (DSL).

The purpose of this letter is two fold. The first is to inquire about Health Canada's efforts to incorporate stakeholders prespectives into the activities of Health Canada on DSL. As you may know, we were active members of the Technical Advisory Group (TAG) established by Environment Canada to address issues related to the categorization and screening framework for DSL. We were disappointed that the work of TAG did not resume beyond 2001. We considered our participation on the TAG to be significant as we provided different perspective on several issues before TAG. It is this level of participation that member organizations from the Canadian Environmental Network Toxics Caucus including World Wildlife Fund Canada and the Canadian Association of Physicians for the Environment look for. We hope that the efforts by Health Canada on the DSL would offer similar opportunities for participation. We propose that Health Canada review the structure and terms of reference for the work of the TAG for consideration. On this matter, we would be pleased to discuss options for participation.

Second, we are responding to your suggestion regarding consultation of the Health Canada website. We have consulted materials on the Health Canada website which discuss the framework for Health Canada's work on the DSL. Having read these materials, we would like further information about the following matters.

1. On the Health Canada website which describes the DSL categorization phase¹, it is stated that a number of proposals are being developed and tested for categorizing DSL substances on the basis of the greatest potential for exposure to Canadians, and on the basis of inherent toxicity to humans. We would like to request a detailed summary of these proposals, and of their status.

¹ http://www.hc-sc.gc.ca/hecs-sesc/exsd/cat_ds13.htm

2. The Health Canada website² sets out a four-stage process for development of categorization within the DSL, including a *call for information*, an *initial external peer review process*, a *second stage peer review*, and a *general public review*. To our knowledge, the *call for information* has not been posted as yet. Can you confirm this impression, and provide us with an estimated timeline for initiation and completion of these four stages?
3. The pilot process appears to be a key to the whole categorization and screening process, because, as stated on the Health Canada website³, it is in the pilot program that approaches and processes for categorization, and approaches, processes and content of Screening Level Risk Assessments (SLRAs) will be developed and refined. Therefore, we are requesting a detailed summary of the approaches and processes that are being developed and refined, and a summary of the general status of the pilot project.
4. It is stated on the Health Canada website⁴ that, during an SLRA, “There will be no or only a very limited consideration of weight of evidence and mode of action.” Weight of evidence and mode of action are central steps in evaluating a substance’s potential to harm humans and wildlife. Can you please clarify what is meant by this passage?

Also in your November 26th letter, you indicated the option of making a presentation on the status of Health Canada’s work on DSL categorization and screening, and the possibility of further discussing these matters. We would be pleased to schedule a date for such a presentation and discussion. We expect that such presentation would be of significant interest to many member organizations of the Canadian Environmental Network Toxics Caucus. As you suggest, we will be in touch with Ms. Anita Redfern to set a date and coordinate the Caucus participation.

We look forward to your response. Please do not hesitate to contact us should you have questions.

Yours truly,

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Copy to: Paul Muldoon, CELA, Chair of the CEN Toxics Caucus; Kevin Kavanagh, WWF, Director of National Conservation Program; CEN Toxics Caucus Steering Committee, Danie Dube

² http://www.hc-sc.gc.ca/hecs-sesc/exsd/cat_dsl2.htm

³ <http://www.ec.gc.ca/substances/ese/eng/dsl/pilpro.cfm> + <http://www.hc-sc.gc.ca/hecs-sesc/exsd/screening2.htm>

⁴ <http://www.hc-sc.gc.ca/hecs-sesc/exsd/screening.htm>