TO: Hon. Marjorie Michel, PC, MP, Minister of Health August 5, 2026
AND TO: The Honourable Julie Aviva Dabrusin, Minister of Environment and Climate Change,
AND TO: Dr. Miranda MacPherson and Mr. Greg Carreau, Canadian Focal Points for the Framework
c./o Strategic Policy and International Affairs Branch
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Re: Canada's position on the first Global Framework on Chemicals meeting in Geneva in November 2026

Dear Ministers Michel and Dabrusin,

The UN Environment Program will host its first-ever conference on the Global Framework on Chemicals in Geneva, November 16-20, 2026. The framework was adopted by the state parties, including Canada, in 2023.

So far, the Canadian federal government's consultations on the Canadian position have consisted of an online questionnaire asking respondents only to rate the relative importance (by ticking boxes) of several features that have already been adopted in the agreement. The survey closes today, 3.5 months before the November meeting. I do not recall or see any record of consultations concerning the Global Framework on Chemicals in the records of the Canadian Environmental Network in the past three years, despite participating in several bilateral meetings with your officials from both departments. Consulting by circulating an online survey to solicit support for commitments that have already been made by the government seems unproductive and unlikely to elicit meaningful information.

Important matters are at stake.

Although one of the desired outcomes of the November 2026 conference is to adopt indicators and track progress, Canada has long been a signatory to the 1992 *United Nations Convention on*

Biodiversity Convention and even hosted the 2022 conference culminating in the *Kunming-Montreal Global Biodiversity Framework* which committed governments to reduce the harmful use of chemicals and pesticides by 50% by 2030. Canada, despite playing the leadership role in that protocol, has not yet reported its progress in achieving the harm-reduction goals set therein.

Indeed, Health Canada claims that it is a strict regulator of pesticides despite the fact that it has

1. no published strategy for quantifying such harm, let alone measuring and publishing progress reports;
2. not even publicly consulted on a strategy for measuring such risks and is still secretive about the amounts of pesticides and chemicals used and sold in Canada, far more secretive than US and EU regulators;
3. recently quietly closed Environment and Climate Change Canada's Aquatic Ecosystems Health, Substances and Waste Management unit that had employed between 800 and 1,500 experts and administrators according to Treasury Board estimates of staffing allocations;
4. witnessed a 20% rise in the total amount of pesticides sold between 2017 and 2022) and rose 14% from 2020 to 2024, and
5. banned and refused to approve only 31 pesticides, far fewer than the European Union, which banned 225 pesticides and did not approve 274, according to the Pesticide Action Network's annually updated list. Canada sells more than 70[*] 44 pesticides that have been expressly banned in more than 30 countries (based on a comparison of the 2024 PAN list to Health Canada's list of Pesticides sold in Canada in 2021 and published in 2024.

Likewise, the federal government's recently proposed National Strategy Respecting Environmental Racism and Environmental Injustice appears, at once, to be ill-suited to detecting instances of environmental justice and unprepared to take action to prevent them or remedy them if they occur. (c.f. CHSL's submission that will soon be posted at: http://healthscienceandlaw.ca/)

Canada's participation in the November 2026 consultations on the United National Global Framework on Chemicals should be motivated by a goal-oriented effort to achieve the harm-reduction commitments it has already made.

Respectfully submitted,

Bill Jeffery, BA, LLB, MA, Executive Director and General Counsel
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Attached: 2024 Recommendations of the Canadian Environmental Network's Toxics Caucus to the federal government's Chemical Management Program, jointly administered by Health Canada and Environment and Climate Change Canada (Also available online at: https://drive.google.com/file/d/1e6EOWq-F77QoS5Ol6weaBgUhIBP7M0-Z/view) Bill Jeffery is the Chair of the Canadian Environmental Network's Toxic Caucus, but other analysis of this submission reflect the perspective of the Centre for Health Science and Law, alone.

2024 Recommendations of the Canadian Environmental Network's Toxics Caucus to the federal government's Chemical Management Program, jointly administered by Health Canada and Environment and Climate Change Canada

1. PROVIDE TIMELY NOTICES OF CONSULTATIONS. Ensure that consultation dates are communicated well in advance, providing CSOs with sufficient time for planning and preparation.

2. ESTABLISH A MECHANISM TO ENSURE SUSTAINABLE, RELIABLE PUBLIC INTEREST INTERVENOR FUNDING MANDATED BY LEGISLATION INDEXED TO INFLATION AND THE NUMBER AND QUANTITIES OF CHEMICALS. Discretionary funding allocated annually or bi-annually is ineffective for planning and creates a moral hazard, where the Toxics Caucus may avoid robust public interest advocacy to secure continued funding. A mechanism for sustainable funding allocation to CSOs should be established to ensure their effective and meaningful participation in consultations.

3. IMPROVE DATA TRANSPARENCY. Create a dedicated platform for transparent data sharing among government agencies, CSOs, industry stakeholders, and the public. Establish forums for ongoing dialogue and information exchange between stakeholders and decision-makers to foster collaboration and trust.

4. PUBLISH CONFLICT-OF-INTEREST SAFEGUARDS. Companies in Canada and abroad profit from the harmful use, release and spread of toxic chemicals. Interventions and roles of vested interests in assessments should be made fully transparent. Measures taken by Health Canada and Environment and Climate Change Canada to protect the public interest from undue commercial influence should also be made fully transparent.

5. FULFILL THE DUTY TO WARN. Implement measures to enhance public access to information about hazardous chemicals and their impacts. This includes improving product labels and creating an online searchable catalog of chemicals, detailing their risks, exposure levels, and estimated environmental concentrations to ensure broader awareness and understanding.

6. CONSULT ON PLANS TO REDUCE RISKS OF HARM BY 50% BY 2030. The government committed to reducing chemical risks by 50% by 2030 as part of its Biodiversity Strategy. However, the volume and diversity of chemicals are increasing, and the government has

yet to indicate how it plans to collect data, calculate, let alone reduce, these risks. (We share the same urgent concern regarding pesticides.)

7. OPERATIONALIZE THE DEFINITION AND APPLICATION OF THE PRECAUTIONARY PRINCIPLE: The precautionary principle is inconsistently applied when evidence of harm is assessed to be uncertain. Uncertainty often stems from deficiencies in data quality, availability, or comparability. Criteria should be established, consulted on, and the triggering rules should be clarified. These rules should include how essential/irreplaceable a substance is (is there an inherently safer option) and availability of inherently safer processes, products, and/or substances.

8. ASSESS DATA NEEDS. Work with CSOs to identify areas where existing data falls short and develop mechanisms to enhance data collection and validation from diverse communities. Improve data accessibility and inclusivity by involving diverse communities in risk assessments and regulatory actions. Prioritize engagement with affected communities, including vulnerable populations, at all stages, including pre-assessment. Incorporate input from individuals with vulnerabilities such as Multiple Chemical Sensitivities (MCS) to enhance protective measures and promote safer product choices.

9. MANDATE RIGOROUS, PEER-REVIEWED SYSTEMATIC REVIEWS OF PUBLISHED SCIENTIFIC LITERATURE BY DEDICATED GOVERNMENT OF CANADA STAFF. Previous reviews conducted by Health Canada—such as those for lead—have been selective, overlooking major studies that indicated harm. In a systematic review, all relevant studies should be identified and considered, with clear explanations provided for downgrading their importance or giving them little weight. Additionally, the search terms used in these reviews should be transparent, especially for chemicals with ambiguous or widely used names, like mercury and lead, or for those with multiple names or class-specific effects, such as endocrine disruptors or chemicals harmful to pollinators.

10. IMPOSE PREVENTATIVE SUN SETTING AND SUCCESSION PLANNING (INCLUDING WITH A FOCUS ON ESSENTIALITY AND INHERENTLY SAFER ALTERNATIVES) FOR HARMFUL CHEMICALS. Collaborate with civil society organizations and stakeholders to implement strategies to prevent harm, and support the transition towards safer technologies for a healthier and more sustainable future.

11. REPORT THE STAFF COMPLEMENTS OF THE CHEMICAL MANAGEMENT PLAN. Estimates of full-time-equivalent staff dedicated to the Chemical Management Plan have varied widely, from 10 to 100, with no one at the February 29, 2024, meeting knowing the true figure. This number, along with the competencies of the staff, should be included in a report to Parliament. Recent indications suggest that the number could exceed half of the 1,200 full-time-equivalents of officials at Health Canada and Environment and Climate Change Canada mandated for the Chemical Management Plan or other chemical risk-related activities. **We know the answer to this now: 1,600 combined in both departments, 450 for the CMP at Health Canada.**

12. CONSULT ON AND PUBLISH CONFLICT-OF-INTEREST SAFEGUARDS USED IN POLICYMAKING, PRIORITY-SETTING, AND THE EVALUATION OF RESEARCH RELATED TO HUMAN HEALTH AND ENVIRONMENTAL PROTECTION. Participants expressed concern about the lack of procedures for considering input and research from companies, as well as from scientists and other individuals funded by commercial enterprises with conflicts of interest. Mandating and publishing interest declarations, as done by the World Health Organization, is an essential first step. It is also crucial to proactively publish direct or indirect communications with Chemical Management Plan staff. In certain circumstances, it may be appropriate for individuals or organizations with conflicts of interest to be excluded from positions of trust, such as government advisory committees, or to recuse themselves from discussions related to chemicals management. What is the role of Canada's Chief Scientist and her office? https://science.gc.ca/site/science/en/office-chief-science-advisor

13. LINK THE CHEMICAL MONITORING PROGRAM TO FEDERAL HEALTH CARE FUNDING CONDITIONAL ON IMPROVEMENT OF ELECTRONIC MEDICAL RECORDS. Anonymized electronic medical records (including chemical analyses of blood, hair, urine, feces, and other tissues), like waste-water testing, can be used to assess the impact of chemicals on human health.

14. REGULAR QUARTERLY MEETINGS: Negotiating meeting dates around many people's evolving schedules is both time-consuming and frustrating. Meetings should be scheduled well in advance so participants can plan accordingly or send substitute delegates. For occasional meetings to address urgent issues between quarterly sessions—such as the implications of the recent internal audit of the Chemical Management Plan, the significant changes resulting from the 2024 federal budget (including budget reductions and user fees), and the termination of funding for the Chemical Management Plan outreach program to the Toxics Caucus—and efficient coordination through scheduling tools like Calendly or Doodle is recommended.

These recommendations aim to strengthen CSO engagement in the CMP program by prioritizing capacity building, fostering collaboration, promoting education, encouraging engagement, and enhancing public participation. This approach seeks to create a more informed, inclusive, and collaborative framework for chemical management.