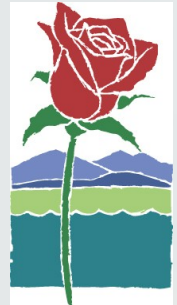


Consumer product labelling

The next step in right-to-know

A presentation of the Labour Environmental Alliance Society



Information on contents?

- No disclosure of ingredients, except voluntarily
- Consumer Chemicals and Containers Regs 2001 — acute hazard labelling only



Cosmetics: ingredients

- Ingredient labelling regs 2004
- INCI standard — industry-based ingredient names
- No hazard disclosure
- Health Canada Cosmetics Hotlist some protection, but gaps



Different picture in workplace

- WHMIS regulations provide:
 - Disclosure of Hazardous ingredients through Material Safety Data Sheets (MSDS)
 - Info on acute and chronic health effects



Not always that way...

- Pre-1988, little disclosure of hazardous materials; some provincial regs e.g. Saskatchewan
- Widespread exposure of workers *and* communities to toxic chemicals and emissions in both U.S. and Canada

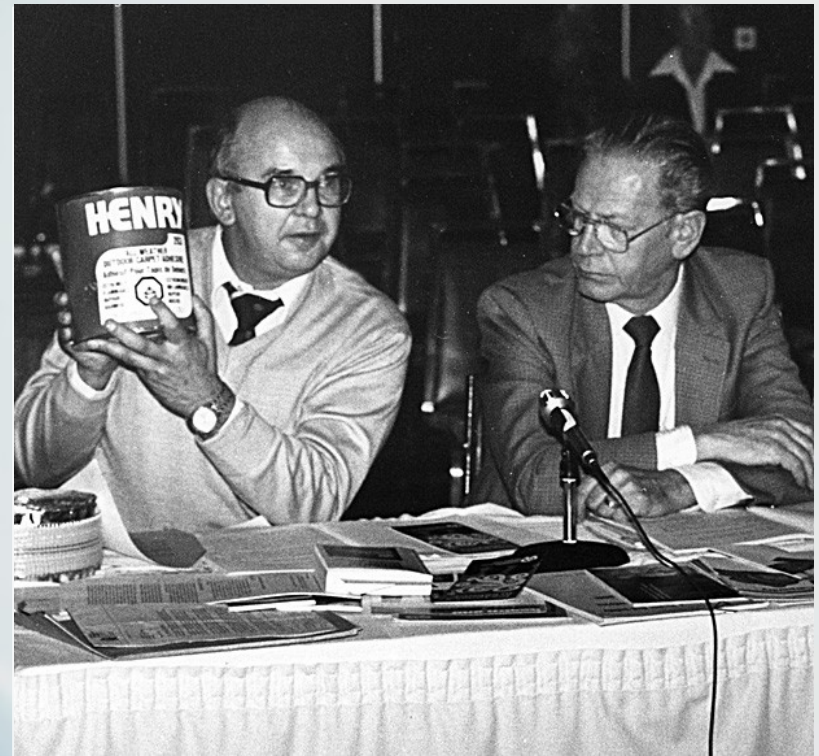
Right-to-Know campaigns

- Campaigns in U.S. for workplace and community right-to-know
- Delaware initiative led by coalition of unions, community, environmental and women's groups, one of first
- Hazard Communication Standard Act, many Community Right-to-Know initiatives by states



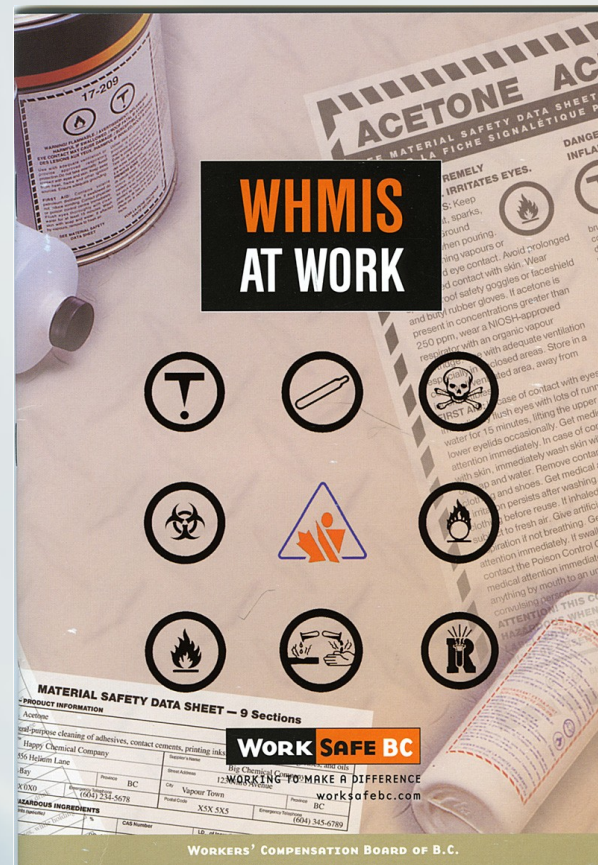
Action in Canada

- Many unions campaigned for regulations to control workplace exposures
- Numerous work refusals over exposure to hazardous substances



Campaign leads to WHMIS

- Government-industry-labour consultation developed Workplace Hazardous Materials Information System (WHMIS)
- Enacted October, 1988



Right-to-know: WHMIS

***** SECTION II: HAZARDOUS INGREDIENTS *****		
CHEMICAL IDENTITY: Sodium Tripolyphosphate OSHA PEL, TWA 15 mg / cu. meter.	CAS# / NA# / UN#: 7758-29-0 TOXICITY (LD50 & LC50): Not available	CONC. (W/W): 40 - 70 %
CHEMICAL IDENTITY: C9-11Alcohol Ethoxylates OSHA PEL, ACGIH TLV:	CAS# / NA# / UN#: 68439-46-3 TOXICITY: LD50, LD50 dermal Not Established	CONC. (W/W): 10-30%
CHEMICAL IDENTITY: Trisodium Nitritotriacetate OSHA PEL, ACGIH TLV: TWA/TLVdust 1 mg / cu. Meter	CAS# / NA# / UN#: 18662-53-8 TOXICITY: LD50 oral, rat 1470 mg / kg	CONC. (W/W): 5 - 10%

- Establishes workplace right to know about hazardous ingredients in workplace chemicals

Right-to-Know: WHMIS

SECTION VI: TOXICOLOGICAL PROPERTIES

ROUTE OF ENTRY:

SKIN CONTACT: Irritant EYE CONTACT: Irritant

SKIN ABSORPTION: Irritant INHALATION: Irritant - May be harmful

EYE CONTACT: Irritant INGESTION: May cause nausea

EFFECTS OF ACUTE EXPOSURE TO PRODUCT: None known EXPOSURE LIMITS: None known

EFFECTS OF CHRONIC EXPOSURE TO PRODUCT: None known IRRITANCY OF PRODUCT: See above

SENSITIZATION TO PRODUCT: None known CARCINOGENOCITY: None known REPRODUCTIVE TOXICITY: None known

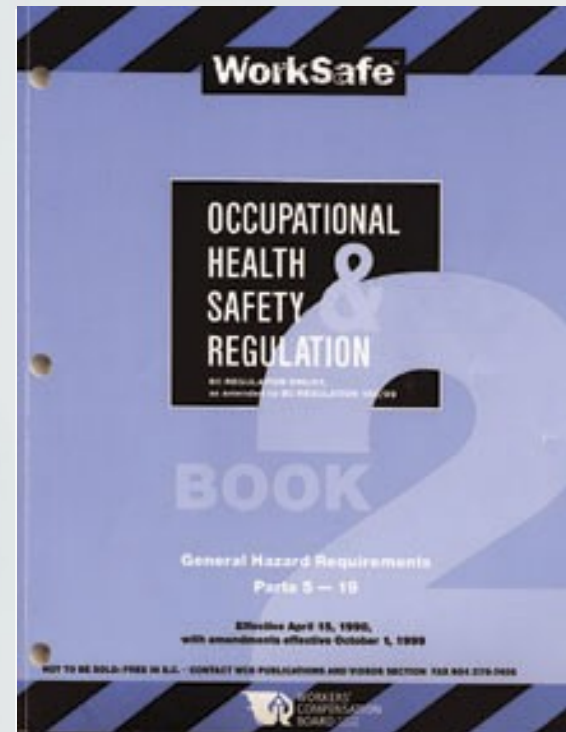
TERATOGENICITY: None known

NAME OF TOXICOLOGICALLY SYNERGISTIC PRODUCTS: None known

- Establishes right-to-know about acute *and* *chronic* health effects of workplace chemicals

WHMIS applies Canada-wide

- All provinces have legislation to enable WHMIS
- B.C. reg also provides for substitution of certain classes of hazardous chemicals
- LEAS uses reg to get unsafe products out

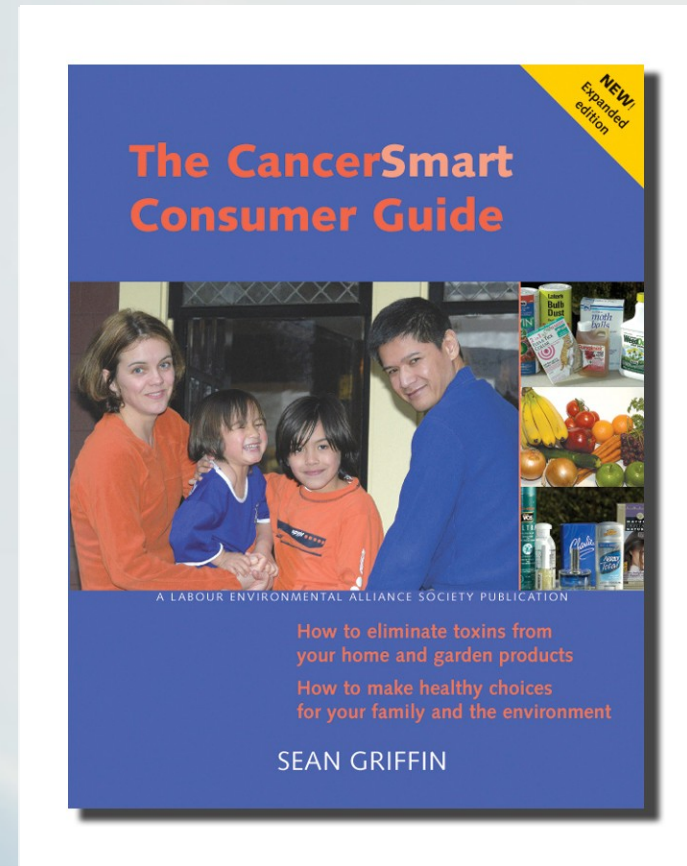


Back in consumer land...

- We have no right to know about ingredients in most products
- ...or chronic health effects of those ingredients

Opening door on ingredients

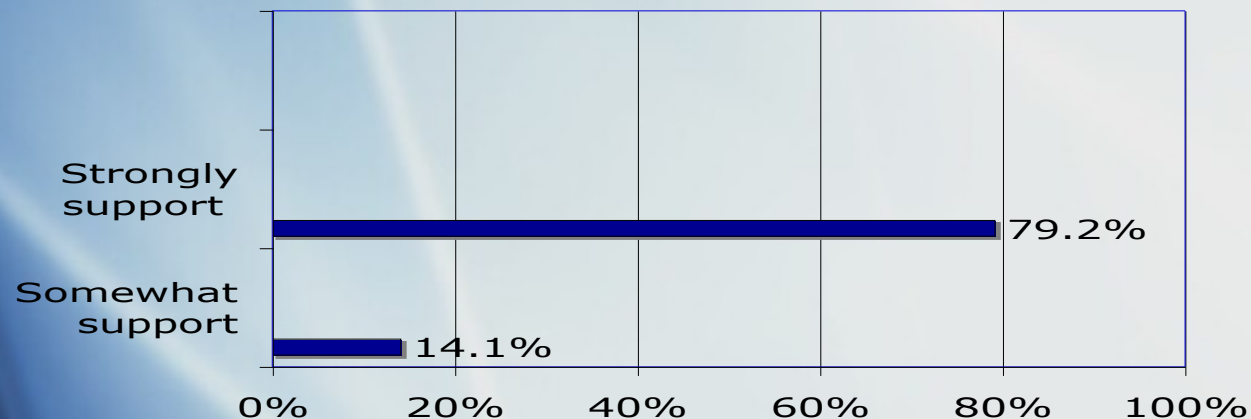
- Lack of right-to-know led to development of CancerSmart Guide
- Prompted by many in workplace who wanted to know why no consumer right



Labelling the next step

- Fundamental right to know about exposure to potentially toxic chemicals is incomplete without disclosure of ingredients, hazards in consumer products
- An essential, next step

Broad support for labelling



- Q: Would you support or oppose the mandatory labelling of carcinogens and toxic chemicals in household and consumer products? (*Strategic Communications poll conducted March 2007 among 606 B.C. residents. Margin of error +/-4%, 19 times out of 20*)

Different approach ...

- Consumer labelling requires different approach from WHMIS i.e. can't depend on separate Material Safety Data Sheet, which requires training
- Simple disclosure of ingredients, inherent hazards
- Ensures informed choice

Labelling in the EU

- EU Directives provide ingredient, hazard labelling for products
- Hazards denoted by letter and a “risk phrase,” — R3, R45 etc.
- E.g. carcinogens assigned letter T and R45 if known carcinogen



Labelling in California

- California's Proposition 65 requires "clear and reasonable warning" on label if carcinogen or reproductive toxin present in product
- 'This product contains the ingredient formaldehyde which is known to the State of California to cause cancer'

GHS labelling initiatives

- Health Canada stakeholder discussion on labelling under Globally Harmonized System currently underway
- LEAS (public interest), labour (CLC) involved

Hazard-based system vital

- Two divergent tracks:
 - industry, no disclosure, risk-based labelling, follow U.S. policy
 - public interest, labour — ingredient disclosure, hazard-based labelling, harmonize with GHS
 - Hazard-based system vital; in line with precautionary principle

Moving forward

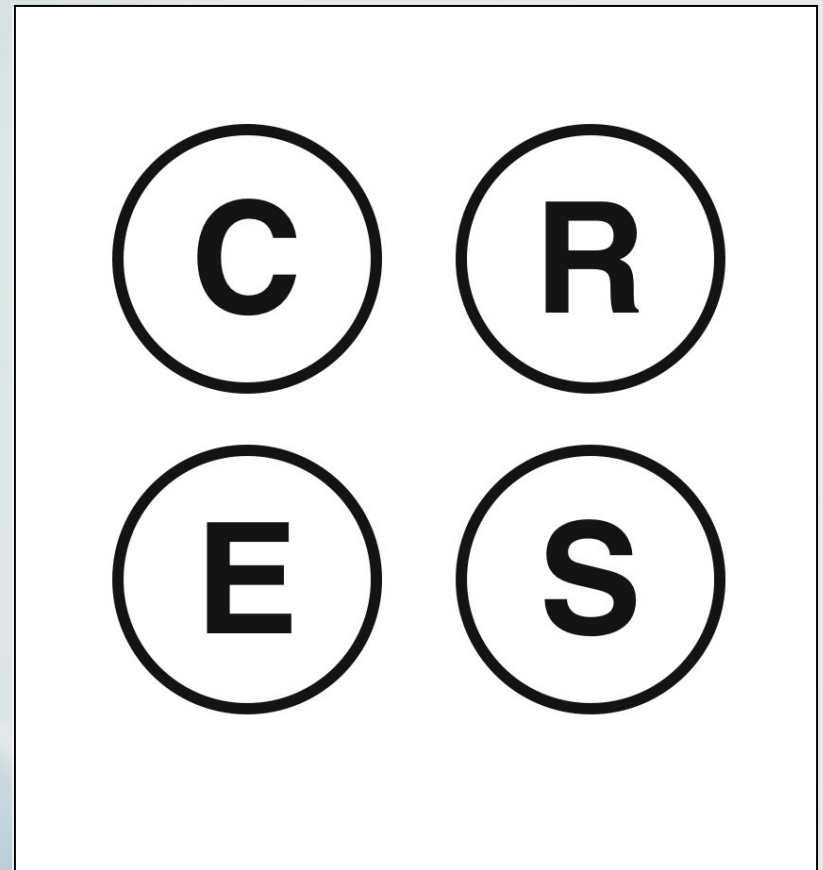
- Provincial initiatives: private member's bill introduced in Ontario in 2007 but unsuccessful
- Federal legislation an essential initiative to reach across country
- Should mirror WHMIS in providing national standard on disclosure of ingredients and inherent hazards in consumer chemical products

What do we want?

- Ingredient labelling, using most common chemical name, possibly including CAS numbers for clarity
- Hazard labelling to indicate carcinogens, reproductive toxins, endocrine disruptors and sensitizers
- Based on inherent hazards of ingredients, not based on estimated risks of use or exposure

Hazard designation

- Could use statement similar to California regulation; or
- Could use recognizable symbol to denote categories, combined with promotion



Authoritative lists

- Hazards determined by authoritative lists of designated toxins e.g. IARC, CEPA, EU-CMR list, Proposition 65, EPA
- Stakeholder forum to work with Health Canada to establish Canadian equivalent



All consumer products

- Initiative should apply to all consumer chemical products, cosmetics and domestic-registered pesticides
- May be parallel legislation in each sector



Asserting right-to-know

- As consumers, we do have the right to know what we're being exposed to
- Ingredient and hazard labelling essential to fulfilling that right
- It is the next step