



The Honourable Minister of Environment and Climate Change, Catherine McKenna
The Honourable Minister of Health, Jane Philpott
The Honourable Minister of Indigenous and Northern Affairs, Carolyn Bennett
House of Commons
Ottawa, ON
Canada
K1A 0A6

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Dear Ministers:

As a physician's organization that seeks to improve human health by protecting the planet, we call for the integration of Health Impact Assessments (**HIAs**) into all federal Environmental Assessment (**EA**) processes.

As the federal government works to develop a comprehensive process to evaluate the impacts of resource development and energy development projects in the wake of the reports, ***"Building Common Ground: A New Vision for Impact Assessment in Canada of the Expert Panel Review of Environmental Assessment"*** and ***"Forward, Together: Enabling Canada's Clean, Safe, and Secure Energy Future—Report of the Expert Panel on the Modernization of the National Energy Board"***, we write to endorse those elements of these reports which acknowledge the connection between health and the environment—and to strongly encourage much more explicit treatment of that connection.

Given the importance of health and community well-being in development processes, their importance as Canadian values, the cross-cutting nature of health, and the role of all departments in supporting healthy policies, plans and programs, the immense 'cost' savings from accurately understanding potential health outcomes of development proposals, and increased knowledge, trust, follow-up and healthy outcomes from advanced understandings of community well-being, health should be central to the tools and resources of EA processes.

It is helpful to situate this conversation within one growing rapidly within the world's health community. We are increasingly recognizing that human health is impacted more by the social and environmental determinants of health – such as income, education, employment, culture, gender, housing, transportation - than by health care. These elements are complex and interconnected, but at this particular moment in time, we are becoming aware that the element which underpins them all is the environment.

Climate change is now acknowledged to be the “greatest threat to global health in the 21st century”¹ by the World Health Organization (**WHO**), and the prestigious medical journal, *The Lancet*, has said that “tackling climate change may be the greatest health opportunity of the 21st century.”² Additionally, concerns about the broader implications of environmental degradation for human health, reflected in the WHO statistic that nearly 1 in 4 deaths worldwide are as a result of living or working in an unhealthy environment,³ as well as an increasing awareness of planetary boundaries, have this year resulted in the launch of a new Lancet-supported discipline, Planetary Health, defined as, “the health of human civilization and the state of the natural systems on which it depends.”⁴

Health professionals are increasingly aware that business-as-usual greenhouse gas emissions trajectories and other disruptions to natural systems will put at risk, not only human health—but our very ability to maintain the societal organization necessary to operate the healthcare systems upon which our populations depend.⁵ Multi-disciplinary health professionals worldwide therefore now aim to put the expertise that we have in terms of evidence-based, action-oriented solution-finding, to work in service of planetary health. This movement is surging—climate-health has been this year a priority for the Canadian Medical Association,⁶ the American Public Health Association,⁷ and the World Health Assembly,⁸ amongst others. Connections are being made quickly, resources are being located, and input of this nature can be forecast to continue and grow from the health sector. Many of these issues are time-dependent. It is therefore imperative that we ensure that this iteration of Canada’s approach to the evaluation of resource development and energy projects captures integrated health concerns.

This conversation intersects with another priority of Canadian health professionals which is incorporating the recommendations of the Truth and Reconciliation (**TRC**)⁹ into our practice. The TRC’s calls to action on health are being explicitly considered by health authorities countrywide—but it is equally important to recognize the health implications of the TRC’s recommendation to adopt and implement the United Nations Declaration on the Rights of Indigenous Peoples, including ensuring free, prior and informed consent before proceeding with economic development projects. Overall, inadequate research and attention has been paid to the impacts of resource development projects on Canada’s Indigenous Peoples, despite the fact that their very connection to the land makes them particularly vulnerable to health-related impacts as a result of land disturbance.¹⁰

Recent announcements of research funding into the health impacts of resource extraction in Indigenous communities,¹¹ as well as growth in the body of evidence around activities such as hydraulic fracturing, on health,¹² will help to remedy the dearth of data—which then needs to be incorporated into a comprehensive attempt to evaluate the health impacts of resource extraction on communities.

A HIA assesses in qualitative and quantitative terms, the health consequences which may result from specific policy actions or development projects. These include the health consequences to a human population of any public or private actions that alter “the extent to which an individual

or group is able, on the one hand, to realize aspirations and to satisfy needs, and on the other, to change or cope with the environment.¹³ Health impacts include any changes to the determinants of health.¹⁴ In 2012, the Canadian Medical Association passed the following resolution at its General Council: “The Canadian Medical Association supports a comprehensive federal environmental review process, including health impact studies, for all industrial projects. (DM 5-29)”.¹⁵ Similarly, in its discussion document on the ecological determinants of health, the Canadian Public Health Association proposed applying “comprehensive impact assessments that address the ecological, social, health and economic impacts of all major public policies and private sector developments.”¹⁶

Details of how the determinants of health can be incorporated into HIAs can be found in the ***Canadian Handbook on Health Impact Assessment***.¹⁷ Moving forward, we have these particular over-arching suggestions:

1. We strongly support the proposal of integrated impact assessments which address the five pillars of sustainability. We were particularly happy to see the inclusion of health and culture as two of the pillars and would like to see an enhancement of health and culture within the federal impact assessment process.
2. We suggest, moving forwards, envisioning the new regime to provide a minimum standard for HIA across all agencies and departments, including the National Energy Board.
3. An equity lens should be applied across all five of the pillars during the process.
4. Just as an Environmental Assessment looks at vulnerable species, it is critical that the health aspect of the assessment assess the most vulnerable people. Standards should be set to protect low income populations, indigenous populations, children, women of reproductive age, the unborn and seniors.
5. Impact assessments should include the long-term cumulative effects of projects on subsequent generations; the Indigenous concept of planning for the 7th Generation is relevant here.
6. If conclusive data on a topic is not available, as in the case of emerging evidence base, or with regards to toxic effects of a substance on children, we suggest taking a weight-of-evidence approach, and then applying the precautionary principle. Qualitative data and Traditional Knowledge must be incorporated and respected, particularly in instances where quantitative data is not available.
7. The final assessment, though having been done in an integrated way, would be most helpful if it could contain a separate chapter focused on each of the five pillars, including health.

In this 150th birthday year for Canada, we particularly appreciate the efforts undertaken by this government to ensure that seven generations from now—or in approximately another 150 years -- Canadians will also be able to live in an environment that is capable of supporting the health and wellbeing of all Canadians. We thank you very much for your work on this and would be happy to meet with you in order to discuss these thoughts further.

Yours truly,



For Dr Courtney Howard, MD, CCFP-EM & Kim Perrotta, MHSc, Executive Director

cc. Dr. Stephen Lucas, Deputy Minister of Environment and Climate Change Canada
Ron Hallman, President of the Canadian Environmental Assessment Agency
David Morin, Director General, Safe Environments Directorate, Healthy Environments
and Consumer Safety Branch, Health Canada

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