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Re: Canada Gazette, Part I, Volume 155, Number 17: PFAS Group Assessment and Stakeholders

The Canadian Association of Physicians for the Environment (CAPE-ACME) supports the government's "[Notice of intent to address the broad class of per- and polyfluoroalkyl substances](#)" published in the Canada Gazette on April 24, 2021. We commend the government for this decision.

The proliferation of thousands of PFAS chemicals in products and industrial applications creates adverse human and ecological health outcomes. PFAS exposure has been linked to many health impacts, including cancers, liver damage, low infant birthweight, thyroid disease, immune system effects and increased risk of asthma (*please see below for relevant resources and references*). Therefore, addressing PFAS as a class is a critical issue under the Chemicals Management Plan.

As physicians working at the intersection of health and environment, recognizing differential and disproportionate impacts of chemicals exposures by individuals and populations, including those made more vulnerable by both biological and social conditions, we believe it is correct to address per- and polyfluoroalkyl substances (PFAS) as a class.

We signal our support for this process as stakeholders with a particular stake in the evidence-based health effects, the perspective of human and environmental health, and the intersection with environmental law, and social determinants of health.

CAPE also supports the positions on the health concerns of PFAS as outlined in the letters with multiple organizational signatories submitted by Environmental Defence, Women's Healthy Environments Network and Breast Cancer Action Quebec.

We look forward to seeing government follow through in assessing the substantial risks posed to health and the environment by PFAS and to ceasing use of chemicals with known and suspected adverse health outcomes. We support the government in its efforts to protect people and the environment from toxic chemicals.

Signed,

Dr. Anjali Helferty, PhD
Executive Director, CAPE-ACME

Resources and references:

<https://pfastoxdatabase.org/>

<https://www.healthandenvironment.org/our-work/webinars/pfas-science-and-policy>

<https://www.healthandenvironment.org/our-work/webinars/pfas-science-and-policy>

<https://thenarwhal.ca/opinion-toxic-contaminants-northern-communities/>

<https://www.theguardian.com/environment/2021/may/12/chemical-giants-hid-dangers-pfas-forever-chemicals-food-packaging-dupont>

Grandjean P, Timmermann CAG, Kruse M, Nielsen F, Vinholt PJ, Boding L, et al. (2020) Severity of COVID-19 at elevated exposure to perfluorinated alkylates. *PLoS ONE* 15(12): e0244815.
<https://doi.org/10.1371/journal.pone.0244815>

Garcia-Barrios, Joshua, Mallory Drysdale, Mylène Ratelle, Éric Gaudreau, Alain LeBlanc, Mary Gamberg, Brian D. Laird, Biomarkers of poly- and perfluoroalkyl substances (PFAS) in Sub-Arctic and Arctic communities in Canada, *International Journal of Hygiene and Environmental Health*, Volume 235, 2021, 113754, ISSN 1438-4639, <https://doi.org/10.1016/j.ijheh.2021.113754>.

Kwiatkowski, C. F., Andrews, D. Q., Birnbaum, L. S., Bruton, T. A., DeWitt, J. C., Knappe, D. R. U., Maffini, M. V., Miller, M. F., Pelch, K. E., Reade, A., Soehl, A., Trier, X., Venier, M., Wagner, C. C., Wang, Z., & Blum, A. (2021). Response to "Comment on Scientific Basis for Managing PFAS as a Chemical Class." *Environmental Science & Technology Letters*, 8(2), 195–197.

Morello-Frosch, R., Zuk, M., Jerrett, M., Shamasunder, B., & Kyle, A. D. (2011). Understanding The Cumulative Impacts Of Inequalities In Environmental Health: Implications For Policy. *Health Affairs*, 30(5), 879–887.

Ojo, A. F., Peng, C., & Ng, J. C. (2020). Combined effects and toxicological interactions of perfluoroalkyl and polyfluoroalkyl substances mixtures in human liver cells (HepG2). *Environmental Pollution*, 263, 114182.

Vandenberg, L. N. (2019). Low dose effects challenge the evaluation of endocrine-disrupting chemicals. *Trends in Food Science & Technology*, 84, 58–61.

Whitehead, Heather D., Marta Venier, Yan Wu, Emi Eastman, Shannon Urbanik, Miriam L. Diamond, Anna Shalin, Heather Schwartz-Narbonne, Thomas A. Bruton, Arlene Blum, Zhanyun Wang, Megan Green, Meghanne Tighe, John T. Wilkinson, Sean McGuinness, and Graham F. Peaslee, Fluorinated Compounds in North American Cosmetics, *Environmental Science & Technology Letters*, DOI: 10.1021/acs.estlett.1c00240.