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01 June 2004

Mr. William V. Kennedy
Executive Director
Commission for Environmental Cooperation
393, rue St-Jacques Ouest, bureau 200
Montreal, Quebec
Canada, H2Y 1N9

Dear Mr. Kennedy:

Members of the Canadian Council for International Business (CCIB) Environment Committee continue to express their appreciation for the time you and your associate, Doug Wright, took to meet with us, on 22 March, 2004. During the meeting, we raised concerns about the misleading nature of the Taking Stock reports, particularly in relation to the use of pollutant release and transfer registers (PRTRs). In your most recent draft report, entitled "*Taking Stock: A Special Report on Toxic Chemicals and Children's Health in North America*", we cannot help but once again raise concern over the use of PRTRs and other issues.

As you state in the Executive Summary, "*PRTR data are releases and transfers of chemicals. and do not necessarily reflect exposures to the public of these chemicals.*" Aggregation of chemical releases and transfers by tonnage, as a common denominator, assigns a value to each substance which is independent of environmental or health considerations. Unfortunately, such aggregated data, even when carefully qualified, can seriously misrepresent the risks to population health, associated with individual substances and/or facilities releasing and transferring such substances. It is important to recognise that they do not provide:

A complete picture of releases to the environment from all sources, anthropogenic or natural- in fact in many cases industrial releases account for only a small portion of total releases
Any information on the environmental fate of the releases - some substances remain in the environment longer than others and are transported differently in air, water and in the soil. Some substances may break down into simpler, less toxic forms; others may accumulate in the environment, becoming a potential source of long-term exposure.

Any information on exposure or risk to human health or wildlife - the likelihood that an environmental receptor (fish, wildlife, plant, human) will come into contact with a substance that is emitted depends on where the source is located, how the substance is transported and its environmental fate, which affects the method and likelihood of uptake.

Your report indicates that the lists were compiled by Environmental Defense, from "government and academic sources", There is no indication, however, that any consideration was given by Environmental Defense to the reasons for which the substances were listed, nor the research on which the listings are based. In addition, no information is provided indicating when the lists used to generate the Environmental Defense report were last reviewed for scientific accuracy and currency.

It is our belief that the Commission, as a public and independent body, should base its work and published reports on authoritative scientific source information, rather than from lists that were compiled at various times, in various places, for various purposes. For the Commission to endorse the work of one stakeholder conveys not only an unacceptable bias, but, more importantly, will circumscribe our examination and understanding of the critical issues under review.

Finally, we are pleased that you note in your cover letter that you intend to subject the report to a scientific peer review. But you don't state when this will occur or what will happen do this report, which has already been widely circulated, when a scientific peer review requires significant change. We believe that the report should be subjected to a full scientific peer review by unbiased, qualified experts. There are national and international bodies that already exist and appear to be more appropriate vehicles for creating such information than the Commission.

In light of the above-mentioned concerns, we would urge you to review the methodology on which the report is based, as in its current form, it would provide a radically inaccurate picture or how certain chemicals impact on children's health.

Yours sincerely,

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