



Health Santé
Canada Canada

Health Protection
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protection de la santé
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November 18, 1998

Mr. Charles Low
President,
The Canadian Cosmetic, Toiletry and Fragrance Association
5090 Explorer Drive, Suite 510
Mississauga, Ontario
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Dear Mr. Low

This letter is in further response to your letter of October 5, 1998, regarding Multiple Chemical Sensitivity (MCS) and the Halifax Regional School Board's proposed policy to ban all scented products in all 146 schools in their jurisdiction. In his initial October 13, 1998 response, Mr. R. Raphael, A/Director General of the Environmental Health Directorate indicated that he would ask me to approach Dr. Felix Li of the Laboratory Centre for Disease Control (LCDC), the File Manager for the MCS issue. As was indicated, Dr. Li is responsible for reviewing and recommending Health Canada policy on this complex issue. This letter will serve to communicate the results of a meeting held on October 23, 1998 between myself, Dr. Li and Dr. Robert Jin, also of LCDC.

Prior to the meeting I reviewed, in detail, the Nova Scotia Department of Labour Draft Indoor Air Quality Regulations, as well as the related materials provided to me by your office on Halifax Regional School Board's proposed ban on scented products. During our meeting we discussed these documents, after which I inquired as to the current Health Canada position on MCS. Dr. Li's and Dr. Jin's response was the following. While Health Canada acknowledges that certain people have multiple, sometimes disabling, symptoms which they attribute to exposure to various chemical agents in their environment, there is insufficient medical or scientific evidence at this time on which to draw any firm conclusion about a causal link between the clinical syndrome known as MCS (or environmental hypersensitivites) and specific environmental exposures, be they in the form of industrial chemicals, food additives, scented products, or otherwise.

While certain items, such as peanuts, are well known as allergens and can produce anaphylaxis and other life-threatening symptoms, these cases are well documented and policies that protect children with sensitivities to these products are well justified. Frankly, I have deep concerns over the precedent that could potentially be set here and would question the constitutionality of the proposed Draft Indoor Air Regulations, and the legality of a policy that prohibits the use of certain products without supporting medical or scientific evidence. Precious resources might be expended enforcing such a policy where they would be better spent managing health issues that are scientifically justified. I, however, am not qualified to comment further in this area and believe that this is a matter best left to the legal community and legislators to determine.

I hope this information, limited as it is, is of value to you. At this time Health Canada continues to keep current with the latest scientific literature on MCS and related conditions, and to undertake consultations with clinicians and researchers in this field. I have provided Dr. Li and Dr. Jin with copies of the documentaion on this issue and they in turn, have reciprocated with materials for my review. We have all agreed to exhchange information in this area on an ongoing basis in the hope that a clue may be found as to what causes these sensitivites. I would encourage the CCTFA to do the same.

Should you feel it necessary to meet on this issue, or state this position to the Halifax Regional School Board, I would be happy to do so.

Sincerely,

(original signed by Hugh G. Davis)

Hugh G. Davis
Acting Head, Microbiology and Cosmetics
Product Safety Brueau
Environmental Health Directorate

CC: C. Carter
L. Carter-Philips

The logo for the Government of Canada, featuring the word "Canada" in a serif font with a small Canadian flag above the letter 'a'.