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June 25, 2004

Dr. Sheela Basrur
Chief Medical Officer of Health & Assistant Deputy Minister
Ministry of Health and Long-Term Care
Hepburn Block, 10th Floor
80 Grosvenor Street
Toronto, Ontario M7A 2C4

Dear Dr. Basrur:

Re: Building Environmental Health Capacity Within Public Health

I am writing on behalf of the Ontario Public Health Association (OPHA) which feels strongly that environmental health capacity within Ontario's public health sector must be enhanced as part of the restructuring process in which the Ministry is currently engaged.

OPHA has been very outspoken on environmental health issues over the last few years thanks to the dedication of our [Environmental Health Work Group](#). A large percentage of the active members in this Work Group work full-time on environmental health issues for public health units in Ontario, and they know from experience how few public health staff are available to address environmental health issues such as drinking water, air quality, pesticides, West Nile Virus, heat waves, climate change, source water protection and recreational health (e.g. pool water).

More importantly, this Work Group understands how many public health units do not have any staff dedicated to some of these important environmental health issues. For example, they know of some public health units where the only staff who have the expertise to address issues related to air quality are the Medical Officers of Health. This Work Group also knows of regulations, standards and policies that are being developed on issues such as source water protection, transboundary air pollution, and Certificates of Approval by the provincial and federal governments, that have the potential to greatly benefit or harm public health, where Ontario's public health sector has largely been excluded from the consultation processes because of our limited resources or expertise.

We believe this must change. We believe that the Mandatory Health

Programs and Services Guidelines, which currently make almost no mention of air quality except as it relates to environmental tobacco smoke, must be revised to incorporate an Environmental Health Program that includes risk identification, monitoring, research, policy analysis, program development, health promotion and cross-linking with other program areas such as children's health. We believe that this Program should be conducted by staff with specialized expertise in environmental and health issues and public health inspectors.

We know that much of the background work needed for the development of a mandatory Environmental Health Program has been done. Some of our members were involved in the development of an Environmental Health Education, Promotion and Advocacy Program (also known as the Healthy Environments Mandatory Program) that was supposed to be included in the 1992 Mandatory Guidelines. That Program was supported by both the Canadian Institute of Public Health Inspectors (CIPHI) and the Ontario Public Health Association.

We also believe that the environmental health capacity of the Public Health Division within the Ministry of Health and Long-term Care must be strengthened and enhanced to reflect, and support, the Environmental Health Programs that would be required of local public health units. We encourage you to recognize this important area of public health and would welcome the opportunity to discuss this issue further with you or your staff.

Sincerely,

Dr. Peter Wiebe
President

c.c. George Smitherman, Minister of Health & Long-term Care
Andrew Papadopoulos, Executive Director, alPHa
Theresa Schumilas, Chair, Environmental Health Work Group
Kim Perrotta, Environmental Health Manager, OPHA