



The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

Ontario Public Health Association
l'Association pour la santé publique de l'Ontario
Established/Établi 1949

57 Marion Avenue North
Hamilton, Ontario
L8S 4G2

Tel: (416) 367-3313
E-mail: admin@opha.on.ca
www.opha.on.ca

President
Lisa Demaline
E-mail: president@opha.on.ca

Executive Director
John Atkinson
E-mail: jatkinson@opha.on.ca

- Constituent Societies**
- Association of Ontario Health Centres (AOHC)
 - Association of Public Health Epidemiologists in Ontario (APHEO)
 - Association of Supervisors of Public Health Inspectors of Ontario (ASPHIO)
 - Canadian Institute of Public Health Inspectors - Ontario Branch (CIPHIO)
 - Community Health Nurses' Initiatives Group (RNAO)
 - Health Promotion Ontario (HPO)
 - Ontario Association of Public Health Dentistry (OAPHD)
 - Ontario Association of Public Health Nursing Leaders (OAPHNL)
 - Ontario Dietitians in Public Health (ODPH)
 - Ontario Society of Physical Activity Promoters in Public Health (OSPAPPH)

Charitable Registration
Number 11924 8771 RR0001

July 26, 2022

Water and Air Quality Bureau, Health Canada
3rd Floor, 269 Laurier Avenue West
Address Locator 4903B
Ottawa, ON K1A 0K9

Re: Draft Risk Assessment Benzene Releases from Gasoline Stations: Implications for Human Health

Dear Sir/Madame:

Thank you for the opportunity to comment on the draft Risk Assessment *Benzene Releases from Gasoline Stations: Implications for Human Health*.

OPHA requests that the Government of Canada move quickly to finalize the risk assessment on benzene releases from gasoline stations, and would like to provide the following recommendations:

1. Consider methodologies to assess risk from exposure to benzene from multiple gasoline stations, given that Health Canada's risk assessment recognizes that *"it is not unusual to find multiple gas stations within close proximity to one another, thus increasing exposure to populations living there"*, and that a 2021 study by Hsieh, et al identified that *"clusters of gas stations have increased cancer risk compared to a single station because of cumulative emissions from the individual gas stations."*
2. Widely share the risk assessment findings with all government departments and agencies at all levels to help inform policy to protect the health of Canadians, including those most vulnerable such as pregnant people and children, from exposure to benzene emissions. Examples include but are not limited to: Environment Canada which regulates gasoline dispensing flow rates, the provincial Ministries of Environment, the Technical Standards and Safety Authority, provincial ministries of municipal affairs and land use planning, ministries of health and public health agencies.
3. Develop policies, standards and guidelines to reduce benzene exposure from gasoline stations, and strongly encourage provincial/territorial and municipal governments to mandate minimum setback distances for new construction of gas stations and sensitive uses.

4. Encourage and support provincial and municipal jurisdictions considering a ban of new gas stations through zoning amendments. These measures can improve health not only by reducing emissions of local air pollution but also by decreasing greenhouse gas emissions that contribute to climate change.
5. Rapidly scale up mandates for light-duty cars and passenger truck sales to be zero-emissions and increase investments in electric vehicle manufacturing and infrastructure.
6. Support other health protective and health promoting sustainable transportation measures that reduce reliance on gasoline-powered vehicles including public transit, compact communities and active transportation.

Sincerely,



John Atkinson, Executive Director

More about the Ontario Public Health Association

OPHA has established a strong record of success as the voice of public health in Ontario. We are a member-based, not-for-profit association that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including advocacy, capacity building, research and knowledge exchange. Our membership represents many disciplines from across multiple sectors.

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