



July 8, 2010

Jan Dyer, Director General
Environment Canada
Sustainability Directorate
10 Wellington Street, 25th Floor
Gatineau, Quebec K1A 0H3

Re: Consultation on Federal Sustainable Development Strategy

Dear Ms. Dyer:

Thank you for the opportunity to provide comments on the proposed strategy.

The Canadian Nurses Association (CNA) believes that the environment is an important determinant of health and has a profound impact on why some people are healthy and others are not. We also recognize that health, health care and the environment are linked inextricably. For example, environmental contaminants have been associated with compromised health status, including cancer, birth defects, respiratory and cardiovascular illness, gastrointestinal ailments and death – and an increased demand for a range of health-care services.

CNA is pleased, therefore, that the federal government is fulfilling its commitment under the *Federal Sustainable Development Act* to develop a comprehensive federal sustainable development strategy. We are pleased also that the strategy has been informed by advice from the Commissioner of the Environment and Sustainable Development.

CNA agrees with the selected areas of focus, including climate change, water quality and a reduced environmental footprint. We also agree with the proposed approach of applying an integrated, whole-of-government lens to environmental sustainability, supported by goals and targets that will be integrated into the Expenditure Management System through measuring and reporting on appropriate performance indicators. We are particularly pleased that targets will reflect the precautionary principle. However, we would encourage the government to more explicitly draw on social justice frameworks, given that some populations are more vulnerable than others to environmental risks – especially families living in poverty, migrant workers and visible minority groups, including residents of First Nations, Inuit and Métis communities.

With respect to climate change, CNA urges the government to adopt more stringent targets. CNA calls on the federal government to set a national target to cut greenhouse gas emissions at least 25 per cent from 1990 levels by 2020.

Human health depends on the health of the environment, and CNA values actions that prevent or reduce harm to the environment. Thank you for your efforts to make environmental decision-making more transparent and accountable to Canadians. We appreciate the commitment to report every three years and we look forward to gauging your progress. I urge Environment Canada to continue its important work and to complete and implement the strategy.

Sincerely,

A handwritten signature in black ink, appearing to read "R Bard".

Rachel Bard, RN, M.A.Ed.
Chief Executive Officer