



Environmental Sensitivities Coalition of Canada

April 11, 2021

Service Ontario
Treasury Board Secretariat
315 Front Street West, 7th floor
Toronto, Ontario
M7A 0B8

Service Ontario Representatives,

In accordance with human rights legislation, environmental sensitivities (ES) are a recognized disability requiring accommodation both provincially and federally. The Accessible Canada Act denotes in section eight that universal design for accessibility in buildings is necessary for all disabled people to have equal access and opportunities. As people with environmental sensitivities are negatively impacted by fragrances, quaternary ammonium compounds and high levels of volatile organic compounds (VOCs) in cleaning products, hand sanitizers, and personal care products, the use of these products in government buildings is counter to accessible design as listed in the ACA, linked below. Currently, even though 32.2% of the population has self-identified as having negative health reactions to fragranced products, Service Ontario locations across the province do not meet the bare minimum in terms of accessibility for people with environmental sensitivities. Additionally, 1.1 million Canadians have been diagnosed with multiple chemical sensitivity, 3.8 million people have asthma, 2 million have chronic obstructive pulmonary disease, and 4.7 million people have migraines, all of whom are affected by fragrances.

As a government service, there are several things that should already have been in place to be in accordance with accessibility law. There is currently no signage in the buildings indicating fragrance free policies, nor are there notifications for customers upon booking appointments to alert them to not wear scented products. There is insufficient ventilation and a lack of air purification systems in place to counter customer product use. Health Canada warns that indoor volatile organic compounds are a hazard—dangerous not only to sensitive customers, but a constant health risk for your employees. HVAC air purifiers rated to clear the size of the location, with carbon filtration designed to remove indoor VOCs, are necessary for accessibility.

With regards to public health policies, there are further considerations not currently being made. Customers should not be mandated to use hand sanitizers if they have a sensitivity to the product. While all Health Canada approved hand sanitizers can be problematic for people with ES, (who can have a variety of reactions to alcohol/ethanol, benzalkonium chloride and hydrogen peroxide), any additional scent, fragrance and parfum additives can compound reactions, and should be universally avoided. Ideally, unscented soaps and hand washing facilities should be made available to all people entering the building, to adhere to universal design standards. In a situation where this is not possible, hand sanitizers should be placed outside the building entrance to minimize exposure. Additionally, staff must not use hand sanitizers before touching documents for those who have specific product triggers.

Off-site and outdoor or online options must be available for people who cannot go in the building due to anaphylactic, dermatological, respiratory, neurological, emotional and vascular responses to products being used to disinfect, should non-toxic unscented soaps not be allowed by local public health mandates. A curbside service needs to be established in which the bulk of the process is handled by phone or website and then identity and documents can be verified in person outside the facility. Photographs for identifications should be able to be captured offsite based on specified parameters similar to passports. As some people have issues with print inks, digital copies should be an option for all documents. Eye tests should be available as a doctor's note.

Accommodation for people with disabilities is a legal requirement, and as a government service, you should be held to the highest standard of adherence to this law.

Regards,

A handwritten signature in black ink, appearing to read 'Erin Caton', with a long, sweeping underline that extends to the right.

Erin Caton
Chair, Environmental Sensitivities Coalition of Canada

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