



September 12, 2014

Ms. Agatha Garcia-Wright  
Director, Environmental Approvals Branch  
Ministry of the Environment and Climate Change  
2 St. Clair Avenue West, Floor 12 A  
Toronto, ON M4V 1L5

Dear Ms. Garcia-Wright:

**Re: WEG Southwestern Landfill Proposal- Response to Additional Walker Comments on Health Impact Assessment**

The Joint Municipal Coordinating Committee (JMCC) received the attached Sept 2, 2014 letter addressed to you from the Walker Environmental Group (WEG). The JMCC is of the opinion that WEG is incorrectly portraying a Health Risk Assessment (HRA) within an Environmental Assessment (EA) as the equivalent to a Health Impact Assessment (HIA). Our Acting Medical Officer of Health, Public Health staff and our Peer Review Team expert disagree with WEG in this regard.

It is important to note that HRA and HIA are not equivalent processes. HRA is one analytic method for estimating health impacts and is used to examine discrete relationships between specific environmental contaminants, exposures and a single outcome. However, a HRA often fails to look at the synergistic and cumulative effects of potential contaminants. More importantly, within a HRA the economic and social considerations frequently lack depth.

HIAs tend to be a more comprehensive form of assessment that analyzes the potential direct and indirect health impacts of a project and explores the impacts of a project on the wider determinants of health. Hence the HIA need not be a separated or parallel process to the EA, but integrated into an EA. Through a HIA based approach, key factors that determine health are examined in much greater detail, thereby providing better assessment of community health and well-being issues.

We support WEG's commitment to form an expert panel on health effects administered by a WEG representative, and consisting of:

- The Oxford County Medical Officer of Health (currently Dr. Neal, Acting);
- The JMCC Health Peer Review Expert (currently Dr. Derek Hillis); and
- WEG's health expert (currently Dr. Glenn Ferguson, Intrinsic).

The formation of an expert panel aligns within the theoretical framework of a HIA, and will democratically ensure that multiple perspectives are taken into consideration.

Our opinion remains unchanged that in order to adequately address our community's needs a HIA process must be employed to explicitly address potential health impacts and inequities.

Yours truly,

Margaret Lupton  
Mayor, Township of Zorra  
Chair, Joint Municipal Coordinating Committee

Copy to: Michelle Whitmore, MOECC, Darren Fry, WEG, Joint Municipal Coordinating Committee