



# BUILDING A HEALTHIER SASKATCHEWAN:

Recommendations to Reduce the Levels of Radon and Improve Mitigation Rates and Radon Awareness in the Province.



# TAKE ACTION ON RADON SASKATCHEWAN COALITION MEMBERS

All Sask Radon

Canadian Association of Radiation Scientists and Technologists (CARST)

Canadian - National Radon Proficiency
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Sun Ridge Residential

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Take Action on Radon National

Vent Pro Mechanical

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# BUILDING A HEALTHIER SASKATCHEWAN:

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#### What is Radon?

Radon is a radioactive gas that is created naturally as a byproduct of uranium breaking down in the ground. Radon is invisible, and it has no odour or taste. Every home has some level of radon, and the only way to know how much radon is in a home is to conduct a long-term radon test. Radon seeps into homes through cracks in the foundation, pipe openings, and other places where the house is open to the ground. Radon can also be dissolved in well water and return to a harmful gas upon entry into a home. In confined spaces (like homes), radon can build up to high levels and become a health risk.<sup>1</sup>

#### What are the Health Risks of Radon?

Radon gas exposure is the second leading cause of lung cancer. Approximately 16% of lung cancers are estimated to be the result of radon exposure, with one in every 20 individuals who are exposed to high levels of radon (over 200 Bq/m³) developing lung cancer. People who smoke and are exposed to high radon levels have an even higher risk (1 in 3) of developing lung cancer. Lung cancer cases connected to radon gas exposure are responsible for approximately 3,000 deaths in Canada each year. The health risk from radon is long-term; the longer an individual is exposed to high levels of radon, the greater the risk of developing lung cancer. Health Canada's current action level for radon is 200 becquerels per cubic meter (200 Bq/m³). In homes that have radon results higher than 200 Bq/m³, it is recommended that a C-NRPP certified mitigation professional is utilized to design, develop, and confirm proper installation of a radon mitigation plan.¹

# GOVERNMENT-OWNED, MANDATED, AND/OR LICENSED BUILDINGS.

Recommendation 1: Test, mitigate (when necessary), and re-test all provincial government-owned, mandated, and/or licensed buildings including schools, childcare centres, workplaces, and housing.

Radon testing is performed to reduce risk, and this should extend to protect those who reside or are employed within government-owned, mandated, and/or licensed buildings. Apart from health protection, testing for radon has various other benefits. Testing is an excellent way for governments to gain new knowledge about provincial radon prevalence. Additionally, government-led testing sets excellent precedence for individuals to test their own homes for radon by spreading awareness and promoting and supporting local radon mitigation companies. Canadian provinces and territories including Quebec, Manitoba, and the Yukon have already conducted provincial/territorial radon testing and mitigation in government-owned, licensed, and/or mandated buildings.<sup>2</sup> It is recommended that Saskatchewan implement a similar strategy and require that a C-NRPP certified mitigation professional is utilized to design, develop, and confirm proper installation of the mitigation plan.

#### a. Schools

Schools have a legal basis for radon action due to the occupational health and safety rights of staff and their broad duties to protect the health of the students. In 2017, Saskatchewan (along with Prince Edward Island, Nova Scotia, New Brunswick, Quebec, and the Yukon) conducted province/territory-wide testing for radon within 756 public schools through the CAREX Canada program. This was done to better protect students, teachers, and administration from the health effects of radon.<sup>3</sup> However, this testing was completed in 2017, and, as a retest is recommended every five years, the province is overdue to retest its schools, as well as capture new schools built since the initial testing period. Additionally, the results from the 2017 provincial testing were never publicly released. A follow-up outlining the levels within the schools, as well as whether any of the schools were mitigated, is now being requested. Going forward, it will be crucial to abide by a 5-year testing schedule to ensure that radon levels within schools remain safe.

#### **b. Child Care Centres**

Mandating radon testing in child care centers would protect children and caretakers from exposure to high radon levels. It is particularly important to test for radon (and mitigate if required) in child care centers as research has found that the long-term risk of developing radon-induced lung cancer is nearly twice the rate in children when compared to adults who were exposed to the same amount of radon as children breathe more breaths per minute on average.<sup>4</sup> Just as British Columbia, Alberta, and the Yukon<sup>5</sup>, and 11 states in the U.S.A.<sup>6</sup> have begun the process of doing, Saskatchewan should mandate testing of child care centres throughout the province to better protect its youth.

#### c. Workplaces

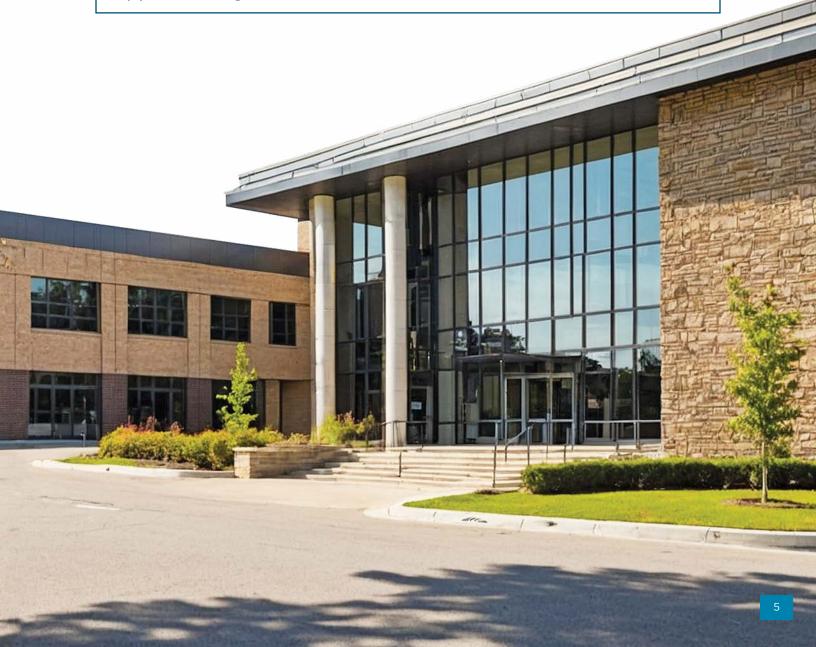
The Saskatchewan Government employs about 12,000 people<sup>9</sup> and a further 614,400 individuals in Saskatchewan are employed<sup>10</sup>. While most employed individuals spend a large portion of their day in their workplace, there is currently no regulation requiring workplaces to abide by an acceptable level of radon to protect their workers from exposure. To amend this, Saskatchewan should adopt and enforce the guideline created by Health Canada and make it mandatory for workplaces to test for radon and to mitigate workplaces who test over 200 Bq/m<sup>3</sup>. <sup>8</sup>

#### d. Housing

Saskatchewan would benefit from having social housing tested for radon as a form of renter protection, as Manitoba did in 2015 through its Housing and Renewal Corporation.<sup>7</sup> The Government of Saskatchewan is the province's largest landlord. It is critical that the government perform their due diligence and test their establishments for radon, and mitigate if required, to better protect their tenants. All new legislation should require radon testing within new government buildings and continue to test for radon after any renovation of existing buildings.

#### 2024 Update

In February of 2024, Lung Saskatchewan and the Saskatchewan Research Council partnered with the Saskatchewan Housing Corporation (SHC) through the Living Skies Housing Authority. Through this partnership, Lung Saskatchewan will provide the SHC with 750 long-term radon test kits every year for the next 10 years as they test their government-owned social housing across the province for radon. This is an excellent step towards testing households supported by the Saskatchewan Housing Corporation, and, more importantly, to help protect the lung health of Saskatchewan residents.



### **RADON EDUCATION & AWARENESS**

Recommendation 2: Improve radon education, awareness, and reach throughout the province.

Statistics Canada continues to show room for improvement regarding radon knowledge and action in Saskatchewan among the public. In 2021, 66% of Saskatchewan households had heard of radon, compared to the national average of 56%. While 66% of Saskatchewan households had heard of radon, only 12% of those households had tested for radon. This displays a disconnect between those educated on radon and those who have tested their homes. As a result, there is a request for government leadership and influence to help increase testing rates provincially.

As Saskatchewan is considered a national "hot spot" for radon, it is critical to ensure the public is well informed. Educating the public on radon is an important step in improving both radon testing and mitigation rates provincially. Accessibility of information and resources will be key in achieving widespread education.

#### a. Elementary Schools and High Schools

Information on radon is best distributed to the public through campaigns, materials, and websites. To reach children and youth, radon education can be added to the elementary and secondary school health and science curricula.

#### **b. Trade Schools**

Trade schools including HVAC, carpentry, and plumbing can add radon education and mitigation strategies to their curricula to continue improving both new and existing homes. It is recommended that building inspectors have radon education included in training programs to increase their knowledge.

#### c. People who Smoke

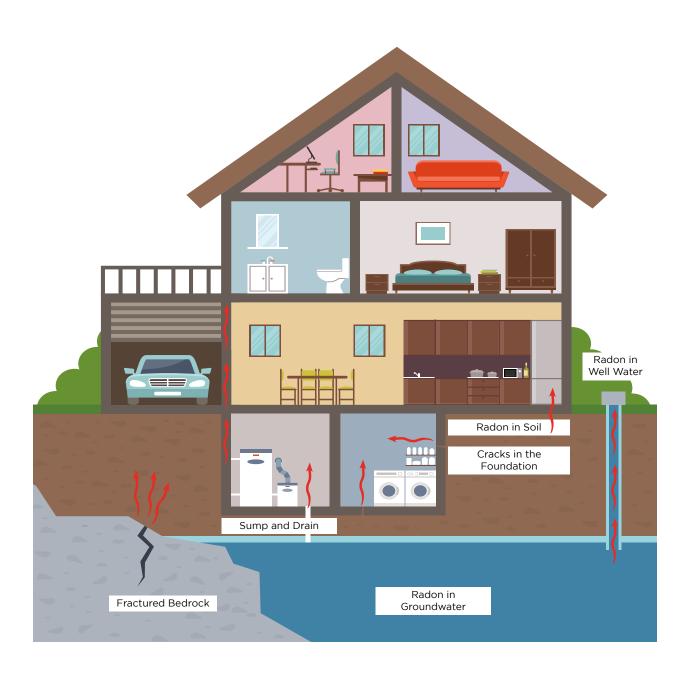
Due to the increased likelihood of developing lung cancer in individuals who smoke and are exposed to high levels of radon, individuals attempting to quit smoking should be provided radon education simultaneously with their cessation information and support. Being better informed of their elevated risk of developing lung cancer due to radon exposure is important. Due to this heightened risk, interventions within this demographic are particularly cost-effective in preventing long-term health effects in the future. Individuals who smoke and who are exposed to high levels of radon are considered to be an at-risk demographic and should be a target of radon education efforts.

#### d. Improved Accessibility and Availability of Radon Knowledge Translation

Radon education in Saskatchewan needs to grow in terms of availability and accessibility. Potential ways of improving provincial knowledge translation regarding radon can begin with;

- Encouraging medical professionals to communicate risks to patients,
- Informing contractors on improved radon mitigation tactics,

- Pursuing provincial advertising campaigns,
- Implementing stronger incentives and subsidies for homeowners, landlords, and tenants, such as Saskatchewan's previous 2021-2022 Home Renovation Tax Credit, where Saskatchewan residents could claim 10.5% of eligible home renovation expenses (including radon measurement and professional mitigation) incurred between October 1, 2020 and December 31, 2022 on their 2021 and/or 2022 income tax returns.
- Providing informational materials to new homeowners,
- Hosting information sessions held at local community centers, and
- Offering radon remediation reimbursement programs such as Lung Saskatchewan's "Caring Breaths" Financial Assistance program which provides up to \$500 to individuals who have had their home mitigated for radon by a C-NRPP certified mitigator.



### PROTECTION OF WORKFORCE

Recommendation 3: Update Saskatchewan's Occupational Health and Safety Regulations (OHSR) to clearly state that the general duties of employers clause is to be interpreted as applying the Canadian Guidelines of Naturally Occurring Radioactive Materials (NORM) to all workplaces regarding radon.

Saskatchewan should be particularly conscious of radon in workplaces due to the high concentration of radon present throughout the province. Radon is detected at varying levels in all dwellings, including workplaces. Office buildings, mines, schools, daycares, and financial institutions can expose their employees to dangerous levels of radon gas.<sup>14</sup>

Research shows that around 31.6% of Canadian workplaces have radon levels over 200 Bq/m³, which exceeds the Canadian Guideline for radon within regularly occupied spaces.¹⁵ To protect individuals who visit or are employed by workplaces, it is crucial to test for radon and mitigate if required. If NORM radon guidelines are exceeded within a workplace, it should be required that a C-NRPP certified mitigation professional is used to design, develop, and confirm the proper installation of the mitigation plan.

Currently, WorkSafe Saskatchewan does not have clear policies on radon. This is problematic as the lifetime relative risk of lung cancer increases the earlier in life an individual is exposed to radon. However, after age 60, any further radon exposure does not contribute much to total lifetime risk. This finding demonstrates the particular importance of updating OHSR policy to better protect the working-age population who fall within this age demographic.<sup>16</sup>

## We suggest changes to the OHSR which in turn can influence WorkSafe Saskatchewan policy.

- 1. Implementing workplace radon gas testing across the province.
- Create a provincial exposure registry for radon (like the already established asbestos registry) as a way for workers, employers, and others to register exposure to or detection of a harmful substance or agent at work.
- 3. WorkSafe Saskatchewan's current public resources need updating. This includes providing enhanced information regarding radon, occupational cancers, and hazards.

Radon should be included within the same Air Quality and Health standards already implemented independently by several municipal governments throughout the province which protect air quality in both indoor and outdoor spaces, such as banning smoking.<sup>28,29,30</sup> Radon safety implementations can be expanded to include regulations requiring testing and necessary mitigation of radon in public indoor spaces. If this change was made, local governments could utilize tactics such as licensing and fines as methods of enforcement to encourage publicized testing and mitigation results.

### MAKING RADON TESTING & MITIGATION ACCESSIBLE

Recommendation 4: Provide financial support and subsidies for radon training, testing, and mitigation as it is a highly cost-effective healthcare intervention.

#### **Cost-Effectiveness**

Testing and subsequently mitigating high levels of radon is a cost-effective health intervention. In combination, testing and mitigating are preventative upstream interventions that have proven to be less expensive than other medical and drug costs, particularly in radon-prevalent geographical areas, like Saskatchewan.

In January 2022, Lung Saskatchewan contracted Insightrix® Research Inc. to conduct an online survey with Canadians who purchased or received a radon test kit within the last 2.5 years. When 1,260 respondents were asked why they had not yet mitigated to reduce potentially high radon levels in their homes, 60% indicated financial constraints as a critical barrier for inaction.

The Saskatchewan healthcare system currently pays for other preventative measures such as pap smears, breast cancer screenings, and colon cancer screenings, so that same system should pay to test and mitigate for radon.<sup>17</sup> This can help to prevent health and financial impacts incurred from lung cancer due to radon exposure. Providing financial support and subsidies to test or mitigate homes for radon is a highly cost-effective measure. In any case where mitigation is needed, it should be required that a C-NRPP certified mitigation professional is used to design, develop, and confirm the proper installation of the mitigation plan.

#### **Subsidy Programs**

Subsidies and incentives exist to share the costs of a collective good and help to promote equity within communities. Financial support for radon testing and mitigation in the form of subsidies (or for free) should be considered by policymakers and include the provision of radon testing kits, extending tax credits (such as the 2020-2022 Saskatchewan Home Renovation Tax Credit), offering direct grants, and other incentives.

- a) A successful subsidy program for the province could involve directly subsidizing trades workers to take C-NRPP certification training, which costs approximately \$2500 per person. This offer could be extended to various vocations including HVAC, carpentry, electrical, plumbing, or engineering.
- b) An additional program could involve the provision of subsidies for radon testing and mitigation offered to low-income residents. Offering reimbursement could help individuals belonging to a lower socioeconomic status to test their homes for radon. If mitigation is needed, it should require a C-NRPP certified mitigation professional to design, develop, and confirm the proper installation of the mitigation plan.

#### **National Support Systems**

#### Radon Testing: Canada Revenue Agency Work from Home Radon Testing Expense

The Canada Revenue Agency has established a program for employed workers to deduct a portion of the cost for radon testing as a work-from-home expense.<sup>19</sup> However, this is not inclusive of all workers as only 18.4% of Saskatchewan residents reported working from home as of 2021.<sup>20</sup>

#### Radon Testing: Take Action on Radon National - 100 Test Kit Challenge

Take Action on Radon National's 100 Test Kit Challenge distributes up to 100 free test kits to municipalities throughout Canada where radon testing has been low thus far.<sup>21</sup> In 2023-2024, out of 51 communities who participated in the challenge, one of the communities was in Saskatchewan. While the program has been successful, it is not able to achieve radon testing on a mass scale which needs to be performed to protect Saskatchewan people.

#### Radon Mitigation: Take Action on Radon National - Radon Reduction Sweepstakes

Take Action on Radon National ran a Radon Reduction Sweepstakes program from 2017-2020.<sup>31</sup> The program gave out 10 cash prizes of up to \$1,000 each to homeowners who tested their home for radon and subsequently mitigated using a C-NRPP certified professional.<sup>31</sup> Through the program, Take Action on Radon National also collected self-reported data from participants on the cost of mitigation, and pre and post mitigation levels of radon gas.<sup>31</sup> Over the four years that the program ran, they received 1226 entries nationally.<sup>31</sup>

#### Radon Mitigation: Canadian Lung Association Lungs Matter Program

The Canadian Lung Association offers radon mitigation support in the form of an up to \$1500 grant towards radon mitigation through their Lungs Matter Program.<sup>32</sup> To be eligible to apply for this grant, applicants must either be diagnosed with lung cancer or be from a low- or moderate-income household.<sup>32</sup> Applicants must also provide a radon test result from a long-term C-NRPP certified radon test kit, and a quote from a C-NRPP certified mitigator of their total cost of mitigation.<sup>32</sup>

#### **Support Provided by Lung Saskatchewan**

#### **Library Lending Programs**

In the fall of 2023, Lung Saskatchewan began supporting a radon lending program through the Saskatoon Public Library (SPL). Radon monitor lending programs reduce barriers such as cost and access and can increase radon awareness in communities and the number of homes that test for radon. Increasing accessibility to radon monitors will help more people test their homes for radon. Since the launch at the SPL, Lung Saskatchewan has also supported the launch of Palliser Regional Library and the Library of Things YXE radon library lending programs and has provided patron lending informational booklets to supplement the Regina Public Libraries existing library lending program. <sup>22,25,26</sup>

#### **Conexus Caring Breaths Financial Assistance Program**

In terms of financial support for mitigation, Lung Saskatchewan runs the Conexus Caring Breaths Financial Assistance Program. In addition to covering various other lung-health-related expenses including medical and travel, Caring Breaths covers up to \$500 for radon mitigation conducted by a certified C-NRPP mitigation professional. However, with the cost of typical radon mitigation being between \$2500 and \$5000, an increase in programs similar to Caring Breaths will be crucial.<sup>13</sup>

#### **Provincial Radon Support Programs Outside of Saskatchewan**

#### Manitoba

Identical to the Canadian Lung Association's Lungs Matter Program, the Manitoba Lung Association offers the same grant exclusively to Manitoba residents, allowing them to receive up to \$1500 towards their radon mitigation. To be eligible, applicants must either be a Manitoba resident diagnosed with lung cancer or be from a low- or moderate-income household.<sup>34</sup> Applicants must also provide a radon test result from a long-term C-NRPP certified radon test kit, and a quote from a C-NRPP certified mitigator of the total cost of their mitigation.<sup>34</sup>

In Manitoba, radon mitigation through a C-NRPP certified radon mitigation professional qualifies for a loan through Manitoba Hydro's Energy Finance plan.<sup>35</sup> The Energy Finance plan allows residents to finance upgrades to their gas and electrical systems through their monthly energy bills to Manitoba Hydro. Through the Energy Finance plan, residents can take out a loan towards their radon mitigation (as long as it is performed by a C-NRPP certified mitigator) of up to \$5000 with 7.8% interest over a maximum term of five years.

#### **British Columbia**

In years prior, the Regional Air Quality Coordinator of the Regional District of Central Okanagan allocated \$25,000 towards a radon grant program.<sup>33</sup> The program offered reimbursements of up to \$500 per household, and up to \$1,500 for low-income households within the Central Okanagan region. This program has since ended.

#### **Ontario**

In Ontario, Tarion Warranty provides coverage on all new homes over the first seven years of construction.<sup>36</sup> Under this warranty program, all costs regarding radon mitigation would be covered. Therefore, new homeowners are encouraged to capitalize on this program and test their home for radon and subsequently mitigate if high levels are detected within the home. To qualify for complete coverage, homeowners are required to provide a long-term test result from a C-NRPP approved radon test.

# PROTECTING SASKATCHEWAN HOMEOWNERS & RENTERS

Recommendation 5: Have the Saskatchewan Government adopt the 2025 National Building Code, requiring a passive radon system in all new buildings.

New construction is an effective place to implement radon provisions as building codes are constantly being updated, with health and safety standards at the forefront. Ensuring new buildings are being mitigated for radon is cost-effective in comparison to mitigating after construction. By adopting the 2025 National Building Code, all new homes will be required to be built with a passive radon system.<sup>23</sup> Passive sub-slab depressurization utilizes a pipe inserted through the foundation of a home and runs upwards inside the building and vents to the outside.<sup>24</sup> Education on passive installation systems for homeowners, contractors, and mitigators, as well as installation conducted by certified C-NRPP professionals, will be crucial to ensure the success of new code implementation.

Recommendation 6: Update energy efficiency programs to take ventilation rates into account, and encourage radon testing and mitigation.

Canada is currently working to promote energy efficiency in homes and buildings across the country, and building codes will develop stricter energy efficiency standards as a response. Energy retrofits made to existing homes and improving energy efficiency in new homes effectively result in reduced energy usage, which therefore reduces the cost to the resident to heat and cool their home and is more environmentally conscientious.

While this environmentally conscious implementation grows in popularity, it is important to pay close attention to the correlation in radon levels. Energy retrofitting homes through means of replacing doors, installation, or windows has been found to increase radon levels.<sup>27</sup> New and evolving energy efficiency programs and guides must be coupled with attention to ventilation rates and testing and mitigating for radon.

If an individual receives funding for energy efficiency programs featuring tax rebates or subsidies, such as Saskatchewan's newly introduced "Homes Beyond Code" program which provides incentives to homebuilders and owners who build energy efficient homes, it should be a subsequent requirement to test the home to observe the impact the update had on radon levels within the building. To help enforce this, if an individual applies to receive a tax rebate for energy efficiency upgrades within their home, a long-term radon test result should be required to be submitted to receive the rebate. Although increased radon levels are an unintended consequence of energy efficiency improvements, they must still be addressed. If mitigation is required as the result of enhanced energy efficiency updates in a home, a C-NRPP certified mitigation professional should be used to design, develop, and confirm the proper installation of the mitigation plan.

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# Let's Build a Healthier Saskatchewan, Together!



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