

December 9, 2020

The Honorable Jonathan Wilkinson, P.C., M.P.  
Minister of the Environment  
c/o The Executive Director Program Development and Engagement Division  
Department of the Environment  
Gatineau, Quebec K1A 0H3  
[eccc.substances.eccc@canada.ca](mailto:eccc.substances.eccc@canada.ca)

**RE: Proposed Order to add plastic manufactured items to Schedule 1 to the *Canadian Environmental Protection Act, Canada Gazette, Part I, Volume 154, Number 41: Order Adding a Toxic Substance to Schedule 1 to the Canadian Environmental Protection Act, 1999***

The Extruded Polystyrene Foam Association (XPSA) is a trade association representing manufacturers of extruded polystyrene foam (XPS) insulation products and the industry's raw material suppliers. XPSA members collectively manufacture the majority of XPS products destined for use in the North American market. XPSA promotes the benefits that accrue to society from appropriate use of XPS foam insulation applications. XPS foam is a premium building insulation providing excellent thermal performance, which helps to make modern buildings more comfortable and more energy efficient, making construction more sustainable via the use of building materials science.

XPSA objects to the Proposed Order referenced above which labels all "plastic manufactured items" as toxic on Schedule 1 of CEPA. Our position is consistent with other plastics industry groups and trade associations. We do not believe available data justifies such an indiscriminate reclassification of plastics.

Instead, we suggest the Canadian government evaluates plastic materials by specific end-use application and makes their determination of any potential hazards in a measured assessment, engaging industry to help reduce relevant product footprints and to control or eliminate any hazards posed. Listing "plastic manufactured items" so broadly in Schedule 1 of CEPA, the Canadian government will be labelling as toxic many plastic products which are definitively non-toxic, do not degrade into microplastics or contribute to marine waste problems, including extruded polystyrene (XPS) foam insulation products.

XPS is a construction material designed specifically *not* to degrade quickly: these products spend their entire useful life in a wall or roof assembly. And XPS foam insulation is normally installed and removed by expert professionals, unlike food packaging or other single-use disposable plastics. XPSA believes Health Canada and Environment & Climate Change Canada has unfairly characterized all plastics as toxic, where a more pragmatic evaluation is called for. We look forward to further dialogue on this proposal.

Sincerely,



Michael Taylor  
Executive Director  
Extruded Polystyrene Foam Association