

December 09, 2020

The Honourable 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

Sent by email; [eccc.substances.eccc@canada.ca](mailto:eccc.substances.eccc@canada.ca)

**Reference: Notice of Objection and Request for Board of Review in relation to the 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***

Dear Mr. Wilkinson,

Industrial Gas Consumers Association of Alberta ("IGCAA") was established in 1988 and represents eleven large industrial natural gas consuming companies in the Province of Alberta. IGCAA member companies add value through a local market for approximately 2.0 Billion cubic feet per day of natural gas, contributing over \$3.0 Billion annually to Alberta Government Revenue and direct employment of more than 16,000 Albertans in highly skilled jobs. The IGCAA industrial group of companies are engaged in many of the major sectors of Alberta's economy, including the energy, agricultural and Petro-chemical manufacturing industries.

I am writing to you on behalf of IGCAA. This submission responds to the October 10th, 2020 Gazette Notice ("Notice") in which the Governor in Council, on the recommendation of the Minister of the Environment ("Minister"), proposed an Order to add "Plastic Manufactured Items" to Schedule 1 of the *Canadian Environmental Protection Act, 1999* ("CEPA") (hereafter referred to as "Proposed Order").

IGCAA would like to formally object to the Proposed Order, and request that you establish a board of review under section 333 of the *Canadian Environmental Protection Act* (the Act) to review the recommendation.

IGCAA supports the view of some of its members that a Board of Review is warranted as the Proposed Order to add plastic manufactured items to Schedule 1 is based on a process which is inconsistent with previous Chemicals Management Plan ("CMP") screening assessments.

*"Adding Value in Alberta Using Natural Gas"*

Under the CMP, in order to satisfy the requirement for a screening assessment, a draft screening level risk assessment (DSLRA) and final screening level risk assessment (FSLAR) have been traditionally the vehicles through which the requirements of section 74 have been met.

The Government has made numerous commitments to sound science. We believe that establishing a scientific panel to review the work of the government is consistent with the Prime Minister's instructions in the Minister's mandate letter. The mandate letter notes that the Minister will ensure that "the Government of Canada is committed to strengthen science in government decision-making and to support scientists' vital work." A Board of Review could challenge the conclusions and act as a check to non-peer reviewed data (citizen science) upon which the exposure scenarios and Proposed Order are based.

The Government of Canada has initiated a comprehensive agenda to achieve zero plastic waste and eliminate plastic pollution by 2030, which will require implementing a range of risk management measures. Transforming the national economy cannot be the subject of a grand ideological experiment based upon "citizen science", but rather requires a strict adherence to the sound science, institutions, regulatory processes and traditions that have sustained this country for over a century and a half.

A Board of Review can assist the Minister in making a more concrete connection between the identified risk and the regulatory instrument which is proposed to manage the risk.

For communications regarding this matter, please contact Wilfred Barke at [wilf@igcaa.ca](mailto:wilf@igcaa.ca).

All of which is respectfully submitted.

**INDUSTRIAL GAS CONSUMERS ASSOCIATION OF ALBERTA**



Wilfred Barke  
Executive Director