



December 9, 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, Québec K1A 0H3

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

Dear Minister Wilkinson,

**RE: 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***

Inteplast Bags & Films Corporation (IBFC) is taking the opportunity to respond to the Government of Canada's proposed order adding "plastic manufactured items" to Schedule 1, the List of Toxic Substances, under the *Canadian Environmental Protection Act* (CEPA) published on October 10, 2020 in Canada Gazette, Part I, Volume 154, Number 41.

IBFC is a division of the Inteplast Group which is a North American plastic manufacturer that takes pride in sustaining hundreds of industries and the livelihoods of thousands of professionals. The Inteplast Group has over 50 locations across the US and Canada and has grown to encompass locations beyond North America. The product mix includes options for just about every market – from automotive to agriculture, construction to grocery/retail/food service. There is an entire division devoted to medical supplies.

This submission is on behalf of our two IBFC locations operating in Delta, BC and Saint John, NB and represents 120 direct employees who manufacture plastic bags for the retail/grocery market. While we have access to the vast range of products made in other Inteplast Group facilities, we exist due to our own manufacturing. These two facilities joined the Inteplast Group in 2008 but have both been operating in their respective locations for over 35 years. We have a long history of environmental stewardship and voluntary extended producer responsibility including a 30+ year closed-loop bag recycling program with grocery retailers in Atlantic Canada.

With that in mind, we cannot agree with the proposed order to add "plastic manufactured items" to Schedule 1. We share the government's goal of reducing plastic waste in the environment but designating a wide range of chemically inert items as "toxic" is not only confusing to the public but compromises Canada's chemical management system. It is wrong to identify every plastic product as toxic regardless of how it is disposed of. Furthermore, this designation undermines the work that has

been undertaken by industry, provincial governments and municipalities to increase the collection and recycling of plastics. The recycling of plastics within a circular economy is the most effective way to combat adverse environmental impacts.

As a member of the CIAC, we know that our concerns will be addressed and outlined in detail on a separate submission from them. We won't repeat that detail here but we do urge the government to undertake a more thorough assessment of the science and consequent risks relating to specific substances before developing or implementing any risk-mitigation measures under CEPA. We also ask that the government continues to work with stakeholders, the provinces and territories to build a circular economy framework that identifies the most effective actions to achieve zero plastic waste.

Sincerely,



Terry Ricketts  
Sales Manager  
Inteplast Bags & Films Corporation