



Ministre de l'Environnement et  
du Changement climatique

Minister of Environment  
and Climate Change

Ottawa, Canada K1A 0H3

APR 21 2021

Bruce Hollands  
Executive Director  
Uni-Bell PVC Pipe Association  
201 E. John Carpenter Freeway, Suite 750  
Irving TX 75062  
U.S.A.

Dear Bruce Hollands:

I am responding to the Notice of Objection and request to establish a Board of Review that you filed on behalf of the Uni-Bell PVC Pipe Association regarding the proposed Order to add plastic manufactured items to the *List of Toxic Substances in Schedule 1* to the *Canadian Environmental Protection Act, 1999* (CEPA). The proposed Order was published in the *Canada Gazette*, Part I, on October 10, 2020.

Subsection 332(2) of the CEPA states that any person may file a Notice of Objection requesting that a Board of Review be established. As set out in subsection 333(1) of CEPA, the mandate of a Board of Review in this instance would be to inquire into the nature and extent of the danger posed by plastic manufactured items.

I have fully and carefully considered the issues set out in your Notice of Objection. As the scientific information and additional references provided in your Notice did not raise sufficient uncertainty or doubt in the scientific considerations underlying the proposed Order to warrant the establishment of a Board of Review, I am denying your request to establish a Board of Review. The scientific considerations that underlay the proposed Order were related to the ability of macroplastics to have an immediate or long-term harmful effect on the environment or its biological diversity as set out in section 64 CEPA.

In your Notice of Objection, you state that the Science Assessment of Plastic Pollution does not use references that specify proportions of PVC, that PVC-specific studies should not be extrapolated from global findings to the Canadian environment, and that assertions about PVC applications were not adequately validated. As this information was not related to the science supporting the proposed Order, I did not consider it in my decision regarding the establishment of a Board of Review.

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50<sup>e</sup> anniversaire d'Environnement et Changement climatique Canada  
Environment and Climate Change Canada's 50<sup>th</sup> anniversary

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150<sup>e</sup> anniversaire du Service météorologique du Canada  
Meteorological Service of Canada's 150<sup>th</sup> anniversary

Canada

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With regard to the non-scientific issues raised in your Notice of Objection, these are being considered alongside other comments received on the proposed Order and will be addressed in the Regulatory Impact Analysis Statement that is published with the final Order.

I appreciate your bringing the Uni-Bell PVC Pipe Association's concerns to my attention.

Please accept my best regards.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jonathan Wilkinson".

The Honourable Jonathan Wilkinson, P.C., M.P.

c.c.: Jacky Bonilla, Uni-Bell PVC Pipe Association