Ministre de l'Environnement et
du Changement climatique

Minister of Environment
and Climate Change

Ottawa, Canada K1A 0H3

APR 2 1 2021

Tony Vella
Vice President Materials
Vision Extrusions Group Ltd.
201 Zenway Boulevard
Woodbridge ON L4H 3H9

Dear Tony Vella:

I am responding to the Notice of Objection and request to establish a Board of Review that you filed on behalf of the Vision Extrusions Group Ltd. regarding the proposed Order to add plastic manufactured items to the *List of Toxic Substances* in Schedule 1 of 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. I have also thoroughly reviewed the additional references you provided. 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 are 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 raised the issue that the Science Assessment of Plastic Pollution was published without a complete view of the best available science. I can assure you that in preparing the Science Assessment, the current state of science regarding plastic pollution was reviewed and the assessment presented a thorough summary of the science available in the peer-reviewed literature at the time it was written. Scientific studies discussed in the report were validated against a set of qualitative criteria, and where study limitations were

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identified, this is clearly indicated in the text. The report clearly acknowledges that uncertainties exist and high quality information is lacking in several study areas.

In addition, the draft Science Assessment was peer-reviewed, both internally within the Government of Canada and externally by leading experts in the field. The internal review component involved a sequential process beginning with experts internal to Environment and Climate Change Canada and Health Canada and expanding to other government departments (Natural Resources Canada, National Research Council, and Fisheries and Oceans Canada). The external review component involved six peer reviewers. These reviewers provided expert comments and input into the report. Reviewers were chosen because of their known expertise in plastic pollution. The draft Science Assessment was also subject to a 90-day public comment period.

You also raised concerns that the exposure scenarios in the Science Assessment of Plastic Pollution were not based on peer reviewed data. As described above, all references cited in the Science Assessment, including those on exposure, were peer-reviewed and validated against a set of qualitative criteria.

In your Notice of Objection, you included a technical review of selected references in the Science Assessment, which indicated that the evidence of human health impacts of polyvinyl chloride (PVC) is equivocal, and that vinyl represents a minor component of plastic pollution. As this information is 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.

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 Vision Extrusions Group Ltd.'s concerns to my attention.

Please accept my best regards.

Sincerely,

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