

December 8, 2020

The Honourable Jonathan Wilkinson, P.C., M.P.
Minister of Environment and Climate Change
c/o The Executive Director Program Development and Engagement Division
Department of the Environment
Gatineau, Quebec, K1A 0H3
eccc.substances.eccc@canada.ca

RE: Pembina Pipeline Corporation Objection and Request for Review in relation to the Proposed Order to add plastic manufactured items to Schedule 1 to the *Canadian Environmental Protection Act, 1999*

Dear Minister Wilkinson,

Pembina Pipeline Corporation (“Pembina”) is a leading transportation and midstream service provider that has been serving North America’s energy industry for more than 65 years. Pembina owns an integrated system of pipelines that transport various hydrocarbon liquids and natural gas products produced primarily in western Canada. Pembina also owns gas gathering and processing facilities, an oil and natural gas liquids infrastructure and logistics business and is expanding an export terminals business. Pembina has an interest in exploring other aspects of the hydrocarbon value chain, including manufacturing high value recyclable polymers that can be used in a variety of applications from medical devices to home electronic appliances. Pembina’s integrated assets and commercial operations along the majority of the hydrocarbon value chain allow us to offer a full spectrum of midstream and marketing services to the energy sector. Pembina is proud to offer services that help improve the quality of life for millions of people around the world, from providing safe transportation of energy to exploring opportunities to manufacture high value recyclable polymers.

This letter is provided in response to the proposed addition of “Plastic Manufactured Items” to Schedule 1 of the *Canadian Environmental Protection Act, 1999* (“CEPA”). **Pembina objects to the designation of “Plastic Manufactured Items” as a toxic substance and requests that further review supported by science is undertaken by the Minister of Environment and Climate Change.** Pembina believes that comprehensive assessment, scientific review and further industry consultation are required in relation to the proposed designation of “Plastic Manufactured Items” as a toxic substance under CEPA Schedule 1.

Plastic Manufactured Items are not Toxic

Plastics bring tremendous value to our modern and sustainable lives. Pembina recognizes the urgent global issue of managing plastic waste and as such supports the collective action of governments, industry and society to reduce plastic pollution. We are however of the view that the designation of “Plastic Manufactured Items” as a toxic substance is overly broad and not sufficiently connected to the risks associated with plastic pollution in the environment. The designation must be narrowed to identify specific substances and items that may be of concern, and this needs to be based on sound scientific evidence. Environmental risk arises from improper use and disposal of plastics and low and inefficient rates of recycling processes. As such, plastic waste, not plastic itself, is the problem to be solved. The designation of “Plastic Manufactured Items” as a toxic substance improperly targets the product, rather than the pollution-generating behaviour.

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Strengthening Science in Decision-Making

The government has made commitments to strengthening the use of science in policy decision-making in Canada and this should also apply to plastic policies. Pembina believes that targeted scientific review and further research are needed to guide scientifically-sound policies that are appropriate to the scale of this matter. As such, we are of the view that the establishment of a scientific panel to review the work undertaken to date by the government is required.

Pembina appreciates your consideration of this letter and looks forward to any opportunity to discuss our shared interest in plastics sustainability.

Sincerely,



Stuart V. Taylor

Senior Vice President & Corporate Development Officer, Marketing & New Ventures

Pembina Pipeline Corporation