

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
eccc.substances.eccc@canada.ca

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*

Petro Plastics Corporation Ltd. is a plastic bag manufacture that has been in business for 35 years. It is a family owned Canadian company with 30 employees and hoping to grow. Approximately 10% of our plastics produced are part of an existing circular economy where it gets collected by us and recycled by a sub-contractor.

Petro Plastics Corporation Ltd. is also a member of the Chemistry Industry Association of Canada's (CIAC) Plastics Division, which represents Canada's leaders in plastics industry sustainability – a \$28 billion sector that directly employs over 93,000 Canadians.

Petro Plastics Corporation Ltd. formally objects to the Proposed Order and requests the establishment of a Board of Review to review the recommendation.

No Screening Assessment Completed:

The final science assessment of plastic pollution does not fulfill the requirement for a screening assessment of all 'plastic manufactured items' (insufficient basis for the broad category identified in the Proposed Order)

A draft screening level risk assessment (DSLRA) would have a different conclusion; would not have led to such a broad designation; show significant evidence to suggest that the risk to the environment is not from plastic manufactured items; and show that the risk is not related to thy physical and chemical properties of the designated items.

Plastic Manufactured Items are not Toxic.

The Proposed Order is not as specific as a Science Assessment, which correctly identifies the potential harm of plastic pollution in the environment applies to every single piece of plastic in Canada, without exception, regardless of how it is disposed.

The environmental and pollution issues that arise from plastic manufactured items are due to improper disposal. Proper disposal and collection would ensure recyclability. Municipalities can work with manufactures to create a proper collection plan. Municipality, there are no plastics allowed in the

blue bin, despite all of it being recyclable, and it is the municipal waste collection and rejection of recyclability that sends all of the plastic recyclables into the landfills.

Declaring plastic manufactured items as toxic when these acts contribute to the adverse outcome ignores the true cause of the unacceptable risk are disregarded in this proposal

Tradition of CMP: materials are not found to be toxic when the exposures of concern do not emanate from an intended use of the identified risk does not come from the plastic item itself; it is from disposal after intended use.

The Science Approach Document was published without a complete view of the best available science.

DSLRA approach would have led to a more fulsome review of scientific literature and application/contextualization to pollution in Canada; would not have concluded that all plastic manufactured items have the potential to cause ecological harm.

Strengthening Science in Decision-Making

A Scientific panel

- should be established to review government's work
- has no vested political interest in the outcome of the investigation
- government admitted to scientific gaps in Science Assessment that preclude the ability to conduct a quantitative risk assessment – panel could fill these gaps
- Moving ahead with significant data gaps is not overly precautionary
- consistent with the Prime Minister's instructions in the Minister's mandate letter to ensure that "(t)he Government of Canada is committed to strengthen science in government decision-making and to support scientists' vital work."
- ECCC's *Economic Study of the Canadian Plastic Industry, Markets, and Waste (2019)* indicates that plastic leakage (pollution) into the environment from Canada is 1 per cent.

Sincerely,

David Barkel
Vice President
Petro Plastics Corporation Ltd.