



November 30, 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, Quebec K1A 0H3

eccc.substances.eccc@canada.ca

RE: Proposed Order to add plastic manufactured items to Schedule 1 of the *Canadian Environmental Protection Act, Canada Gazette, Part I, Volume 154, Number 41: Order Adding a Toxic Substance to Schedule 1 of the Canadian Environmental Protection Act, 1999*

Thank you for allowing me, representing (SPRI Inc. a 67-member trade association representing manufacturers of flexible membrane roofing systems, the components utilized with these systems, design professionals and testing laboratories), to provide feedback regarding the proposed addition of all “plastic manufactured items” to Schedule 1 of the Canadian Environmental Protection Act (CEPA) which classifies them as toxic substances.

Canada’s proposed rules do not appear to be based on sound science, which is a must in efforts to drive successful and impactful environmental solutions forward. Canada’s recent scientific assessment document was not a risk assessment, and that did not make a compelling case for invasive market action. A true risk assessment would not have justified the broad inclusion of all “plastic manufactured items” into the proposed order. Any risk to the environment does not come from the plastic item itself but from disposal after intended use.

The SPRI membership respectfully requests that the proposed order to classify all “plastic manufactured items” as toxic within the CEPA be withdrawn and a scientific panel which has no vested political interest in the outcome of the investigation be established to review the government’s work leading to the previously referenced order and fill in any gaps within the original scientific assessment.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Ober", with a long horizontal flourish extending to the right.

Randy Ober
Technical Director
SPRI (Single Ply Roofing Industry)