

July 13, 2022

The Honourable Steven Guilbeault
Minister of the Environment
c/o Christina Paradiso
Executive Director Chemicals Management, Environmental Protection Branch
Department of the Environment
351 Saint-Joseph Boulevard, Gatineau, Quebec K1A 0H3
Email: ec.interdiction-prohibition.ec@ec.gc.ca

Re: Notice of Objection and Request for Board of Review in relation to proposed regulations prohibiting the manufacture, use, sale and import of decabromodiphenyl ethane (DBDPE, CAS Registry Number 84852-53-9) and polybrominated diphenyl ethers (PBDEs) while providing exemptions to the prohibitions, Canada Gazette, Part I, Volume 156, Number 20 – May 14, 2022: Prohibition of Certain Toxic Substances Regulations, 2022.

Dear Minister Guilbeault:

* This letter includes our trade secrets. The contents of this letter (including the fact that we submit this letter) are confidential.

Our company writes to express our formal objection to the above-referenced regulatory proposal.

[REDACTED] These products are used for various applications such as automobiles, aircrafts, and home appliances globally, so these are essential for a wide range of industrial fields. There are international standards of flame resistance for safety and using DBDPE as flame retardant is critical to meet the standards. In addition, we have not discovered a replacement which has a stability of supply, cost, and performance equivalent to DBDPE. Therefore, if the use of DBDPE is prohibited, there is a possibility that we can't supply our products to the market stably. Furthermore, it is assumed that reengineering our products and getting replacements require extraordinary cost. It will make an immeasurable impact on a global market including North America.

For the reasons mentioned above, as provided for by section 332(2) of CEPA 1999, our company is filing this Notice of Objection and respectfully request that a Board of Review be established, pursuant to section 333 of CEPA 1999, to "inquire into the nature and extent of danger" posed by DBDPE and PBDEs.

Sincerely,



Takuya Tabuchi
General Manager/ Procurement Department
Sumitomo Electric Industries, Ltd.