

From: Jose Luis Gutierrez-Garcia [mailto:joseluis@upgyres.org]

Sent: November 29, 2016 8:47 PM

To: Produits / Products (EC)

Subject: Canada Gazette, Part I. Written comments and objection on the proposed Regulations for Microbeads in Personal Care Products Used to Exfoliate or Cleanse.

Attn. Ms. Xin Gao

Products Division
Environment and Climate Change Canada
351 Saint-Joseph Boulevard, 9th Floor
Gatineau, QC K1A 0H3

Canada Gazette, Part I

This is a notice of objection requesting that a board of review be established under section 333 of that Act. Objection: the dates and schedules to apply these Regulations.

Dear Ms. Gao,

Upcycle the Gyres Society applauds, supports and encourages the continued work by the Canadian Government with domestic partners and with international partners (through the United Nations and the Organisation for Economic Co-operation and Development) to address the broader issue of microplastics pollution from ALL products containing plastic microbeads that could enter the wastewater system in Canada; including other sources of plastic microbeads in addition to those that are used to exfoliate or cleanse such as sunscreens and moisturizers that are not intended to rinse-off and products with plastic microbeads not only used in toiletries but also in cleaning supplies, (i.e., wet wipes and anti-slip coatings) and in industrial settings (e.g. plastic blasting at shipyards, garments and car parts, oil and gas exploration, textile printing and automotive molding, anti-blocking applications, and medical applications (biotechnology and biomedical research)).

Support for microbeads prohibition

- UpGyres is very supportive of the proposed Regulations and we urge the government to also focus on all major and minor contributors of plastic pollution such as rubber tires, ship paint, fleece clothing, and plastic packaging.

Scope of the proposed Regulations

UpGyres takes its role in achieving a clean, safe and sustainable environment in an expeditious and timely manner. We seriously:

1. Question how industry will eliminate / dispose of left over inventory that contains microbeads when the time comes to apply these regulations. We trust that Canada will make sure Canadian left over products with microbeads will not be exported outside of the country to unsuspecting and non compliant markets and that the Canadian Government will hold industry responsible for

the environmentally responsible disposal of those products without discharging those microbeads into the effluent of this or any other country.

2. Object the dates and schedules to apply these Regulations.

3. Suggest that time is of the essence and the timeline should be moved ahead by one year so that the regulations come into place in 2017-2018 instead of 2018-2019 as per the following edited text:

Manufacture and importation

3 (1) A person must not manufacture or import any toiletries that contain microbeads on or after January 1, **2017**, unless the toiletries are also natural health products or non-prescription drugs, in which case the prohibition applies on or after July 1, **2017**.

Sale or offer for sale

(2) A person must not sell or offer for sale any toiletries that contain microbeads on or after July 1, **2017**, unless the toiletries are also natural health products or non-prescription drugs, in which case the prohibition applies on or after July 1, **2018**.

Because plastic waste entering water and marine ecosystems come from various sources; from plastic bags and bottles to microplastics, which include plastic microbeads and microfibers, the environmental impact from waste plastic pollution continues to increase globally, UpGyres advises the Canadian Government to work with domestic and with international partners to also ban ALL disposable plastics such as plastic dinnerware; plates, cups, cutlery, straws and stirrers.

There is already exist precedence in France's ban on non-compostable plastics:

<http://ind.pn/2cH0W73>

Thank you for your attention and in advance for your confirmation of receipt of our objection and comments.

Regards,

José Luis Gutiérrez-García Project Director, Upcycle the Gyres Society

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