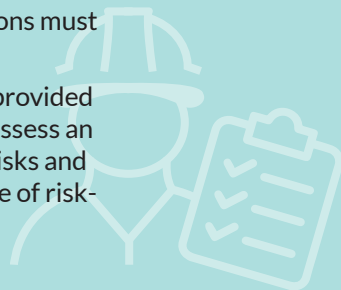


The Chemistry Industry: A strong partner to Canada's chemicals management plan

The Chemicals Management Plan (CMP) is achieving its objective of reducing risks posed by chemicals to Canadians and their environment. Continued success requires that any amendments to the Canadian Environmental Protection Act, 1999 (CEPA) continue to incorporate and/or adopt the following key elements:

Maintain enabling legislation

- The science- and risk-based, weight of evidence approach to risk assessment and risk management decisions must be preserved
- Expert assessors should be provided discretion and flexibility to assess an array of different chemical risks and to choose from a broad range of risk-management tools



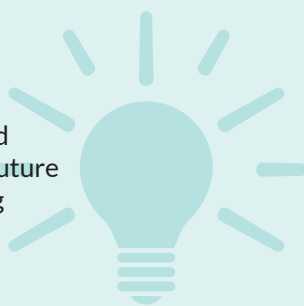
Export the North American approach

- Canada's CMP continues to be the global gold standard for chemicals management
- Other jurisdictions – including Mexico, Brazil, and Australia – are developing CMP-based approaches to chemicals management
- Canadian officials should partner with foreign jurisdictions to ensure that finished products that come to Canada meet the same environmental rigour as those manufactured here



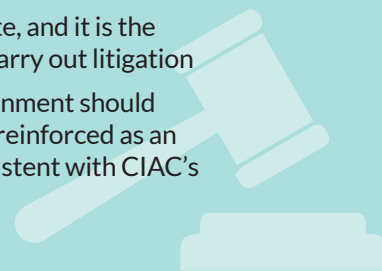
Support innovation

- The CMP must continue to be world-leading and cutting-edge
- New Approach Methodologies should continue to be integrated into CMP activities to support future prioritization and risk screening activities under the CMP



Preserve the current enforcement approach

- CEPA is a criminal law statute, and it is the obligation of the Crown to carry out litigation
- The right to a healthy environment should be enshrined in the Act and reinforced as an underlying philosophy, consistent with CIAC's Responsible Care® ethic



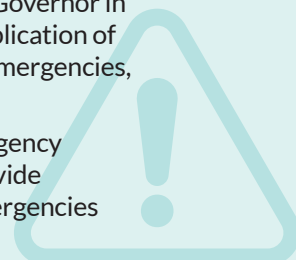
Use accurate language to describe risks

- CIAC has been advocating for a nomenclature change to CEPA Schedule 1 since the original CEPA passed in 1999
- The removal of the name "Toxic Substances List" from CEPA Schedule 1 is a positive development that will help prevent consumer confusion and reduce potential investment barriers



Create a safety valve

- The government should consider a form of "safety valve" that would allow the Governor in Council the right to suspend the application of certain provisions of CEPA during emergencies, such as the COVID-19 pandemic
- This would support industry's emergency management and response and provide regulatory clarity during future emergencies



Canada's CEPA and CMP – A global success story

Chemicals are an integral part of everyday life, essential to our economies, our communities, our homes. Canada's CMP is leading the world in the assessment and management of risks for the full set of existing and new chemicals in the Canadian economy.

Since 1992, as part of their commitment to Responsible Care[®], CIAC members have reduced their releases of substances requiring risk management under CEPA by 62%.

CMP Progress in Reducing Risks from Chemicals

1999 to
2006

CATEGORIZATION AND PRIORITIZATION

All 23,000 substances on the Domestic Substances List (DSL) were reviewed and categorized.

Only 4300 substances were identified as posing potential risk and requiring further assessment.



■ Reviewed and no further action □ To be assessed by 2020

Since
2006

MANAGING RISKS OF EXISTING SUBSTANCES

Scientific risk assessments have been completed for ~ 4000 substances of the 4300 identified as priority for action.

Over 100 risk management actions have been implemented to address over 450 substances found to be CEPA toxic.

Finishing efforts to address the remaining 469 priority substances.



■ Assessment completed ▨ Substance identified as posing risks □ To be assessed by 2020

MANAGING NEW SUBSTANCES

CEPA 1999 requires notification for new chemical substances prior to their introduction into the Canadian market.

Approximately 500 notifications are assessed, and 30 control measures are developed per year.



■ New substances approval ▨ Conditions placed to ensure safe use