

January 18, 2019)

Submitted on-line at <https://ero.ontario.ca/comment/reply/node/526/comment>

Michael Friesen
Senior Policy Advisor
Ministry of the Environment, Conservation and Parks
Environmental Programs Division
Program Management Branch
Toxics Reduction Program
40 St. Clair Avenue West. Floor 4
Toronto, Ontario M4V 1M2

RE: EBR Proposal 013-4235 – Planning and reporting changes under the toxics reduction program and Ontario Regulation 455/09

Dear Mr. Friesen:

The Ontario Forest Industries Association (OFIA) thanks you for the opportunity to comment on the EBR Proposal 013-4235 – Planning and reporting changes under the toxics reduction program and Ontario Regulation 455/09.

The OFIA includes over 40 forest products facilities operating in the province of Ontario, representing all aspects of the product life cycle from forest management through to final pulp, paper and solid wood products. With a strong primary sector, Ontario's forest sector supports advanced manufacturing and innovation in the fields of biomaterials, biofuels and biochemicals. Currently, the Ontario forest products sector represents \$15.5 billion of economic activity and provides over 170,000 direct and indirect jobs across Ontario.

Ontario's forest products sector has a long history of pollution prevention in reducing toxic substances from their facilities including:

- Voluntary elimination of elemental chlorine bleaching to address generation of chlorinated organics, including dioxins and furans.
- Voluntary elimination of products containing nonylphenol ethoxylates (NPEs) in response to concerns around endocrine disruption.
- Ongoing tracking and monitoring of chemical additives to respond to strict customer requirements and concerns around priority substances such as mercury.

Further to this, the forest products sector is actively engaged with the federal government on its Chemicals Management Planning process.

The OFIA applauds the proposal to no longer require facilities with existing toxics reduction plans to review those plans. The OFIA agrees that this will remove unnecessary duplication with federal programs and voluntary environmental management systems. The Ontario

toxics reduction program has produced very little results for the OFIA members. Since 2009, OFIA members have made reductions that were found through their environmental management programs and from declining production. The toxics reduction planning and reviewing activities have only been an administrative activity.

The OFIA recommends reviewing the value of the annual reporting obligations under the *Toxics Reduction Act* for all facilities with existing plans. The reporting requirements of the “releases” duplicate the federal NPRI reporting requirements. The reporting requirements for substances “used and created” is a large administrative burden that has not produced any value in managing nor reducing these substances. Indeed, some of the reporting requirements are meaningless, such as tracking of trace substances in wood. There is no possible way to reduce substances that are naturally occurring in the wood and it takes a lot of work to include them in the inventories. The tracking and reporting processes involves multiple internal professionals and managers. OFIA members estimate that these reporting requirements cost each facility about \$20,000 annually.

If you have any questions, please feel free to contact me at 647-231-1867 or bmosso@ofia.com.

Sincerely,



Barbara Mossop, P.Eng. MBA
Environment and Energy Technical Advisor
Ontario Forest Industries Association

cc:

Jamie Lim, President and CEO, OFIA
OFIA Environmental Affairs Committee