

## Comparison of Toronto Environmental Reporting and Disclosure Program, Ontario Toxics Reduction Strategy and CELA Model Toxics Bylaw (as of September 3, 2008)

Proposed Elements	Toronto ERD	Ontario Toxics Reduction Strategy	CELA Model Law
<b>Reduction / elimination targets</b>	Not included	In development – seeking stakeholder input	50% reduction in releases in 5 years; 20% reduction in use within 5 years of first reporting and 40% reduction within 10yrs
<b>Facilities covered</b>	Same as NPRI: some exempted facilities and sectors; all others covered	Mining and Manufacturing (includes many ERD sectors, but excludes small operations, laboratories, waste, water treatment)	Same as NPRI
<b>List of priority substances</b>	25 priority substances measured in Toronto's air above levels of health concern	475 substances in 4 schedules: (includes all ERD substances) - Schedule 1: 45 NPRI priority substances (includes 15 ERDs) - Schedule 2: 275 NPRI substances + acetone (includes 9 ERDs) - Schedule 3: 20 non-NPRI priority substances (part of DSL and Chem Mgmt Plan) (includes 1 ERD) - Schedule 4: 135 non-NPRI substances (incl. carcinogens, reproductive and neurotoxins)	- NPRI list of 300+ (includes all ERDs) - 193 high hazard under Chemical Mgmt Plan; medium hazard added within 5 years - priority carcinogens
<b>Reporting Thresholds</b>	100 kg for most substances, lower for PBTs; no facility employee threshold	Same as NPRI: >10t for most, lower for PBTs; facilities with 10 or more FTEs (NOTE: these are <u>use</u> thresholds)	> 10t for most, 50 kg for carcinogens, RTs and PBTs; facilities with 5 or more FTEs
<b>Implementation Timeline</b>	2010 – Phase One data collection 2011 – Phase One reporting; Phase Two data collection 2012 – Phase One & Two reporting; remainder collection 2013 – All facilities reporting	Phase One (Schedules 1 and 3 affected): 2010 – data collection 2011 – reporting (+ materials accounting data for Schedule 1) 2012 – toxics reduction planning (Schedule 1 only) Phase Two (Schedules 2 and 4 affected) 2012? Schedule 2 - reporting, materials accounting, toxics planning Schedule 4 – voluntary reductions, review of evidence, possible re-scheduling in future	No timeline proposed
<b>Pollution prevention planning</b>	Not required... Facilities invited to submit P2 information with data	Mandatory toxics reduction plans for Schedules 1 and 2; public disclosure of plan summaries; considering requiring certified planners; plans updated over time	Mandatory P2 plans every 2 yrs; approved by P2 planner; kept on site and public disclosure of summaries
<b>Public Disclosure</b>	Publicly accessible data on usage and releases to air, land and water; web-based	Disclosure of materials use accounting data and toxics reduction plan summaries; propose to use web-based system and streamline with NPRI;	Materials accounting data; publicly available
<b>Consumer product info</b>	Not covered by ERD	Seeking input on new provincial role	Requirements for labeling, MSDS to EMS, disclosure of govt enviro information
<b>Chemical substitution</b>	Not required		Timelines + process for substitution of safer chemicals & elimination of priority substances
<b>Who pays for system</b>	City of Toronto / 1		Fees for industry

THIS KEY DOCUMENT COMPARES  
THREE TOXIC REDUCTION  
INITIATIVES  
TORONTO'S ENVIRONMENTAL REPORTING DATA  
ONTARIO'S TR STRATEGY IN DEVELOPMENT  
CELA'S TOXIC REDUCTION LAW