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Re: Response to Adding “Plastic Manufactured Items” Schedule 1 of CEPA published in Canada Gazette, Part I, Volume 154, Number 41: GOVERNMENT NOTICES (October 10, 2020)

The Canadian Environmental Law Association, Health and Environment Justice Support, Friends of the Earth, Toronto Environmental Alliance, Breast Cancer Action Quebec, Citizens' Network on Waste Management, and David Suzuki Foundation are responding to the proposed Order Adding a Toxic Substance to Schedule 1 to the Canadian Environmental Protection Act, 1999, (CEPA) published in *Canada Gazette, Part I, Volume 154, Number 41* dated October 10, 2020 to add “plastic manufactured items” to Schedule 1 to CEPA. We support the government’s proposal to add “plastic manufactured items” to Schedule 1 to CEPA.

The proposal to add “plastic manufactured items” to Schedule 1 is justified by the findings of the Science Assessment on Plastic Pollution finalized in October, 2020. According to the findings of the Science Assessment, “the increasing amounts of plastic pollution in the environment and the demonstrated ability of macroplastics to harm biota, it is anticipated that the frequency of occurrence of physical effects on individual environmental receptors will continue to increase if current trends continue without mitigation measures.” Additionally, the findings concluded “In accordance with the

precautionary principle, action is needed to reduce macroplastics and microplastics that end up in the environment.”¹

The Gazette Notice noted that “plastic manufactured items” will be listed “as number 163 Plastic manufactured items” on Schedule 1 to CEPA. We support the rationale that “the proposed Order would enable the ministers to propose risk management measures under CEPA on certain plastic manufactured items in order to manage the potential ecological risks associated with those items becoming plastic pollution.”²

Thank you for your consideration. We look forward to your final decision under CEPA.

Yours truly,

Canadian Environmental Law Association



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¹ Environment and Climate Change Canada and Health Canada. October 2020. Science Assessment of Plastic Pollution. Accessed

² Stated in Canada Gazette, Part I, Volume 154, Number 41: Order Adding a Toxic Substance to Schedule 1 to the Canadian Environmental Protection Act, 1999