

May 1, 2020

Hon. Jonathan Wilkinson P.C.,
Minister's Office
Environment and Climate Change Canada
351 Saint-Joseph Blvd.
Gatineau, Quebec, K1A 0H3

M.P. Hon. Patty Hajdu, P.C. M.P.
Minister's Office
Health Canada
Brooke Claxton Building, Tunney's Pasture
Ottawa, Ontario, K1A 0K9

Andrea Raper
Executive Director
Program Development and Engagement Division
Environment and Climate Change Canada
351 Saint-Joseph Blvd.
Gatineau Quebec, K1A 0H3

Via email: eccc.substances.eccc@canada.ca

Re: Publication of the draft science assessment of plastic pollution, Canada Gazette, Part I, February 1, 2020

Dear Ministers Wilkinson and Hajdu and Executive Director Raper:

The Styrene Information and Research Center (SIRC)¹ submits the following comments on the Government of Canada's Draft Science Assessment of Plastic Pollution (Draft), published in the Gazette Part 1 on February 1, 2020 under the Canadian Environmental Protection Act, 1999. Our comments support the comments submitted to Ministers Wilkinson and Hajdu and Executive Director Raper by the American Plastics Council (attached).

¹ SIRC is a nonprofit organization consisting of member companies involved in the manufacturing or processing of styrene and ethylbenzene, and associate member companies that fabricate styrene-based products. For more than 30 years, SIRC has served as a resource for industry, federal and state governments, and international agencies on issues related to the potential impact of exposure to styrene and ethylbenzene on human health and the environment.

SIRC and members of the styrenics manufacturing industry agree the issues of plastics waste and marine debris are significant and are worthy of substantial efforts to reduce plastic wastes and improve the health of our oceans and waterways. However, the draft science assessment is a literature review coupled with broad research recommendations non-specific to any plastic product, packaging, or resin. It is not an assessment nor a risk assessment, and we are concerned that Canada appears to be poised to skip a critical step under CEPA, namely, the development of a scientifically robust risk assessment that presents knowledge of exposures and hazards and integrates these to quantify potential risks to ecological species and human health. We ask the involved agencies to consider the public health consequences of making a CEPA toxic determination the public would associate with plastics, plastic packaging, or resins. A government determination such as this may likely be misunderstood and misinterpreted by the public.

CEPA is designed to evaluate substances with respect to their potential human health and environmental risks. The issues of plastics waste improperly disposed of as litter in the environment and marine debris are fundamentally solid waste issues, not chemical management issues, and therefore are better addressed by available policy solutions tailored to them. We are concerned about this review and the proposed path forward under Canadian Environmental Protection Act.

In our view, it is neither legally nor technically sufficient to support adding plastics as a broad category to CEPA Schedule 1, which would result in a “CEPA toxic” classification. We encourage Environment and Climate Change Canada, Health Canada and other sectors of the Canadian government to work with all stakeholders for viable solid waste management solutions, including source reduction, increased recycling, and the development of advanced (chemical) recycling technologies.

We suggest Environment and Climate Change Canada and Health Canada consider an alternative, better suited legal mechanism that factors in the life cycle tradeoffs of alternatives to plastics and supports Canada’s interest in pursuing circular economy solutions to plastic waste issues.

SIRC appreciates the opportunity to offer comments on the Draft.

Best regards,



Ray Ehrlich
Executive Director

