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Executive Director  
Chemicals Management Division  
Environmental Stewardship Branch  
Environment Canada  
351 St. Joseph Boulevard, 17th Floor  
Gatineau, QC K1A 0H3

SENT BY E-MAIL TO: [RiskManagementPrograms@ec.gc.ca](mailto:RiskManagementPrograms@ec.gc.ca)

To Whom It May Concern:

**Re: PBDE Revised Risk Management Strategy**

As follow-up to comments submitted separately in May by the David Suzuki Foundation, Ecojustice, and the Canadian Environmental Law Association on the draft PBDE Revised Risk Management Strategy, we are writing to bring to your attention information that has recently surfaced about the potential widespread use of decabromodiphenyl ether (decaBDE) in plastic pallets used to ship and store produce.

Information obtained by the U.S.-based Environmental Working Group indicates that major players in the food industry are in the process of replacing wooden pallets with plastic pallets, which may contain decaBDE. The National Wooden Pallet and Container Association (U.S.) claims that 1.2 billion wooden pallets are currently in use in the U.S. and that, according to manufacturer lifecycle analyses, plastic replacements can contain as much as 3.4 pounds of decaBDE. The Environmental Working Group has raised concerns with U.S. regulators that decaBDE used in plastic pallets could contaminate fruits and vegetables as a result of standard industry cooling practices.

Assuming, as seems likely, that the transition from wooden to plastic pallets in the U.S. will affect Canadian food industry operations as well, the reported use of decaBDE in plastic pallets represents a potentially significant source not addressed by the draft Revised Risk Management Strategy. This oversight should be addressed in the final Revised Risk Management Strategy and the forthcoming "Phase II" PBDE regulations should prohibit the use of decaBDE in plastic food pallets.

Moreover, the potential for widespread use of decaBDE in plastic pallets underscores the limitation of the draft PBDE Revised Risk Management Strategy, which focuses exclusively on the use of decaBDE in electronic and electrical equipment. As expressed in our earlier comments, the proposed restrictions must be extended to *all* non-essential uses of decaBDE in order to achieve the stated objective of "minimizing [PBDE] release into the environment from all sources in Canada." While the

majority of worldwide decaBDE production is currently used in electronic and electrical equipment, the ongoing transition to plastic pallets now underway in the food industry – and similar shifts in the future - could seriously undermine PBDE risk management in Canada unless a comprehensive strategy is adopted to restrict all present and future non-essential uses of the chemical.

We hope you will be able to take this new information into consideration as you finalize the PBDE Revised Risk Management Strategy.

**CONTACTS:**

Lisa Gue  
David Suzuki Foundation  
606, 250 Bank Street  
Ottawa, ON K2P 1X3  
613-594-5428  
[lgue@davidsuzuki.org](mailto:lgue@davidsuzuki.org)

Elaine MacDonald  
Ecojustice  
900- 30 St. Patrick Street  
Toronto ON M5T 3A3  
416-368-7533 Ext. 27  
[emacdonald@ecojustice.ca](mailto:emacdonald@ecojustice.ca)

Kathleen Cooper  
Canadian Environmental Law Association  
301, 130 Spadina Avenue  
Toronto, ON M5V 2L4  
416-324-2284 Ext. 221  
[kcooper@cela.ca](mailto:kcooper@cela.ca) CELA Publication No. 666

Janelle Witzel  
Environmental Defence  
317 Adelaide Street West, Suite 705  
Toronto, ON M5V 1P9  
416-323-9521 Ext.222  
[jwitzel@environmentaldefence.ca](mailto:jwitzel@environmentaldefence.ca)