



Canadian
Environmental Law
Association
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ecojustice.ca
formerly Sierra Legal Defence Fund

November 11, 2013

Jody Rosenberger
Head
Environment Canada
NPRI Development
200, boul. Sacré-Coeur
Gatineau, Quebec
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Re: Nomination of 10 substances to the NPRI dated April 20, 2012

The Canadian Environmental Law Association (CELA) and Ecojustice are writing this letter regarding our joint submission of April 20, 2012 nominating ten substances for addition to the National Pollutant Release Inventory (NPRI). These substances are classified as “reasonably anticipated to be a human carcinogen” by the United States National Toxicology Program and releases in the United States since 2011 must be reported under the US Toxics Release Inventory (TRI).

According to your email of May 10, 2013 and information published in April 2013 on the NPRI internet consultation page, of the ten nominated substances Environment Canada found the four nitroarenes to meet the necessary criteria and are thus being considered for addition to the NPRI substance list for the 2014 reporting year.¹

We request that the NPRI office of Environment Canada proceed with the necessary consultation steps regarding the four nitroarenes substances without further delay to ensure the addition of these substances for the 2014 reporting year.

Significant unwarranted gaps exist between the US TRI and Canada’s NPRI. To improve our knowledge base on pollution releases and transfers in Canada and narrow the gap with the US, the expansion of the NPRI program is necessary.

We are available to discuss our nomination with you to ensure no further delay. We look forward to a prompt response to this letter reassuring us of progress on our nomination.

Thank you for your consideration.

Yours truly,

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¹ NPRI Consultation Page < <http://www.ec.gc.ca/inrp-npri/default.asp?lang=En&n=A5D3CFCA-1>>