

To: National Pollutant Release Inventory, Environment and Climate Change Canada

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INCLUSION IN NPRI OF FACILITY TRANSFERS OFF-SITE IN PRODUCTS OR AS PRODUCTS

The following is a brief proposal for activity inclusion in the *Work Plan for Work Group Activities from 2022 to 2024 (WP)*—specifically the reporting of NPRI substances transferred from a facility in or as consumer goods or for use by others to make products.

On its website, ECCC describes the purposes of NPRI reporting in terms of:

- The information that facility owners and operators must report to the inventory:
- helps Canadians understand pollutants releases in their communities
 - encourages actions to reduce pollution
 - helps track progress

Unfortunately, the information that NPRI facilities are required to provide gives only a limited picture of the total toxic materials that these facilities dispose of, recycle, and transfer off site. The NPRI data fails to include the substantial quantities that these same facilities ship off site in and as product. Therefore, it can seriously understate the significance of these facilities in contributing to environmental pollution. This is contrary to the principle of “extended producer responsibility”, which is now the core of many government programs.

To achieve the three goals of NPRI stated above, the NPRI should require facilities to report on hazardous materials transferred off site in or as product.

The idea of reporting pollutants transferred off-site as product or in product is new to neither the NPRI, nor the current workgroup members; it is an item that keeps arising in various areas of discussion.

In 1992-1993 then Minister of the Environment Jean Charest held a consultation on the report from the Multi-Stakeholder Advisory Committee (MSAC) that he had set up to develop a proposal for a Canadian NPRI. In January 1993, the NPRI Citizens’ Caucus (which included the four environmental and labour representatives on the NPRI MSAC) stressed the need to have NPRI reporters include numbers on the amounts of toxic chemicals that they “transferred off-site in or as product.”

The reporting of toxic materials and ingredients in consumer products is essential to knowing the true quantity of these substances being potentially released to and accumulated in the

Canadian environment as a result of activities at those facilities on an annual basis. Further, Canadians have the right to know what harmful substances they may be introducing into their own environment(s) unintentionally when they use and/or dispose of products. Currently there is no accountability by the producers, or reprieve from, their harmful and often persistent substances polluting our water, air, soil and food systems.

Now is an opportune time to explore ways that the NPRI can be improved to help protect the health of Canadians and their environment. There are resources available for us to explore this topic more thoroughly, and there is significant overlap with this activity and current trends. For instance:

- 1) These data are essential to support pollution prevention planning.
- 2) Plastics were recently declared a toxic substance under the Canadian Environmental Protection Act (CEPA), and the majority of plastic pollution originates as post-consumer material.
- 3) PFAS (“forever chemicals”) also enter the environment largely from post-consumer waste, and their accounting would certainly benefit from the reporting of transfers of toxics in consumer goods.
- 4) Chlorhexidine and its salts were recently added to the NPRI for the 2022 reporting year; however, since these substances are primarily found in consumer products, the reporting is unlikely to capture the extent of release without this addition.
- 5) It is an example of how the NPRI can be updated to improve its utility in human health research and cumulative effects assessment.

Industries already report on- and off-site release or disposal of contaminants they use or manufacture. Their products are simply a widespread and more diluted “off-site transfer” that they do not now report. Reporting industries have readily accessible process, production and sales information—all that would be required to develop product-based emission factors using materials accounting / mass balance techniques. The only challenge may be the interpretation of data at a spatial scale. Consideration should be made to contaminants ‘Released’ as a point source at the plant, but then released to the environment at an unknown location in the province or territory in which it was sold. Unlike other toxic or hazardous substance releases to a waste facility, tailings containment, etc., consumer products make their way into every home, playground, school, hospital, landfill, and wastewater treatment plant; only to end up in ground and surface water, soil, air, agricultural products, wildlife, ecosystems, and the bodies of Canadians.

Considering the sheer number and volume of contaminants that enter the Canadian environment through the product pipeline, which starts at each NPRI facility, we think that this addition is long overdue.

Submitted by: NGO members of the NPRI Multi-Stakeholder Working Group