



PROGRESS REPORT

Issue 9, Winter 2017

ABOUT THIS REPORT

This ninth issue of the Chemicals Management Plan (CMP) Progress Report covers activities between July and December 2017. It also provides information about future events, dates of interest and future engagement opportunities.

The report is produced jointly by Environment Canada and Health Canada.

For information about the CMP, or to find previous issues of the CMP Progress Report, visit the <information on chemical substances page on the Canada.ca website>.

Feedback and suggestions can be sent to <eccc.substances.eccc@canada.ca>. ◆

New Chemical Substances website

The Chemical Substances website moved to the new Government of Canada website, <Canada.ca>, in 2017. All URLs have changed and old websites no longer redirect to new ones. Please update your bookmarks.

If you notice a problem or have any concerns, please contact <chemicalsubstanceschimiques@hc-sc.gc.ca>. ◆

HIGHLIGHTS AND REPORTS

CMP highlights

Substance assessment progress

Since the launch of the CMP in 2006, the Government of Canada has:

- addressed 3,331 of the 4,300 chemicals identified as priorities for attention by 2020-2021, including draft and final assessments;
- found 420 existing chemicals to be harmful to the environment and/or human health;
- implemented 80 risk management actions for existing chemicals (additional tools are in development); and

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- received approximately 5,671
 notifications for new substances
 prior to their introduction into
 the Canadian market. These
 notifications have been assessed
 and over 283 risk management
 actions have been taken, when
 necessary, to manage potential
 risks to Canadians and their
 environment.

Risk assessment and risk management highlights

The Government of Canada assesses and, where appropriate, manages the potential health and ecological risks associated with chemical substances. It does so through various initiatives. Here are highlights of risk assessment and associated risk management activities between July and December 2017 for various initiatives.

Chemicals Management Plan Phase 3 initiatives

Changes to the Chemical Substances website

The <CMP webpage> now includes details on <Phase-Three implementation>.

New resource dataset now available for significant new activities

A new resource for the public and stakeholders is now available on <Canada's Open Government Portal>. This resource is made available under the Government of Canada's Chemicals Management Plan and includes information on all Significant New Activity orders and notices

published under the authority of the Canadian Environmental Protection Act, 1999. The Significant New Activity provisions of the Act may be applied when Environment and Climate Change Canada and Health Canada suspect that a significant new activity in relation to the substance or living organism may pose new or increased risks to the environment or to human health. Comments can be provided directly on the resource's webpage by using the "comment" function.

Coming risk assessment publications and consultations

The Government of Canada has updated the <two-year rolling risk assessment publication plan>, with minor changes to address errors in the updated plan published in the summer of 2017. The following assessments/groupings were affected:

Risk assessment		
Assessment	Original pub. date	Modified pub. date
Phenol, 2-(1-methylpropyl)-4,6-dinitro- Draft Screening Assessment	Year 2 / Oct. – Dec. 2017	Year 2 / Jan. – Mar. 2018
Furans and derivatives Draft Screening Assessment		
Benzophenone Draft Screening Assessment		
Cyanides Draft Screening Assessment		
Ketones Draft Screening Assessment	Year 2 / Mar. – Dec. 2018	Year 3 / Apr. – Sept. 2018
Epoxy resins Draft Screening Assessment		
Nitro Musks Draft Screening Assessment	Year 3 / Apr. – Sept. 2018	Year 3 / Oct. 2018 – Mar. 2019
Petroleum Base Oils Draft Screening Assessment	Year 2 / Jan. – Mar. 2018	Year 3 / Apr. – Sept. 2018
PSSA Stream 0 – Coal Tars Final Screening Assessment		Year 3 / Oct. 2018 – Mar. 2019
Poly(alkoxylates/ethers) Draft Screening Assessment	Year 3 / Apr. – Sept. 2018	
Quaternary ammonium compounds Draft Screening Assessment	Year 2 / Oct. 2018 – Mar. 2019	Removed from table (publishing Years 4-5)



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▶ Highlights and reports, continued from p. 2

The two-year rolling risk assessment publication plan will continue to be updated regularly to provide advance notice of timelines for each assessment.

Risk management

The Government of Canada publishes a two-year rolling schedule of risk management activities and consultations. The <online schedule> covers items such as risk management documents, information-gathering initiatives, risk management instruments, performance measurement initiatives and international risk management activities.

New Substances Program: Progress on living organisms

Between June 2017 and December

- 10 pre-notification consultations were completed and 6 are closed
- 15 new living organisms were assessed

New Substances Program: Progress on chemicals and polymers

Between June 2017 and December 2017:

- 15 pre-notification consultations were completed and 5 are closed
- 269 new chemicals and polymers were assessed

- 7 <ministerial conditions> were published
- 7 < Significant New Activity notices > were published
- 82 substances were added to the Domestic Substances List
- 5 substances were deleted from the Non-domestic Substances List
- 239 substances were added to the Non-domestic Substances List
- 10 orders were published amending the Domestic Substances List
- 4 orders were published amending the Non-Domestic Substances List ◆

GENERAL NEWS

Pollution data for 2016 now available

Environment and Climate Change Canada <has published> reviewed 2016 data on pollutant releases to air, water and land, as well as disposals and transfers for recycling.

Each year, data reported by over 7,000 facilities across Canada is made available to the public on the <National Pollutant Release Inventory> website. Data for over 300 substances is provided in a variety of formats, along with an annual overview report.

Reporting requirements are continuously evaluated to ensure that the data collected is relevant and supports CMP data needs.
The <Proposals and Consultations>

webpage contains information on

recent and future changes to the National Pollutant Release Inventory.

Review of the Canadian Environmental Protection Act, 1999

On June 15, 2017, the Standing Committee on Environment and Sustainable Development presented a report on its review of the Act to the House of Commons.

The report, entitled "Healthy Environment, Healthy Canadians, Healthy Economy: Strengthening the Canadian Environmental Protection Act, 1999", offered 87 recommendations for improving the Act through legislative and regulatory amendments and through improved implementation.

Several of the Committee's recommendations focused on the risk assessment and risk management of chemicals.

In its response, tabled on October 6, 2017, the Government of Canada expressed its thanks to the Committee for its important report and thoughtful insights and agreed that changes are needed to modernize and improve the Act.

Given the length and complexity of the Act, which allows the government to take action on a wide range of pollution sources, the government response committed to:

- examining potential amendments to the Act;
- carefully considering each of the Committee's recommendations;
 - continued on p. 4



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- General news, continued from p. 3
- considering regulatory, policy and program changes to address the Committee's recommendations;
- one or more reports to explain actions taken, in response to the Committee's report as well as improvements to implementation of the Act; and
- conducting additional targeted consultations to address the recommendations and improve the Act.

All of the Committee's work, including its report and the government response, are available <online>.

Government looking beyond CMP to chemicals management after 2020

The Government of Canada has begun planning for chemicals management in Canada after 2020.

In May and November 2017, multistakeholder workshops provided the opportunity to reflect on what has worked well and what could be improved upon, and discuss emerging trends and issues that should be addressed in the future.

The Government of Canada is continuing to seek stakeholder input and is examining key areas.

Contact <eccc.substances.eccc@canada.ca> for more information.

Webinar provides overview of national human biomonitoring programs

People interested in how the Government of Canada surveys and monitors environmental chemicals in Canadians can obtain updated information from the Canadian Health Measures Survey in a webinar posted online.

The webinar, hosted by the Canadian Network for Human Health and the Environment, was presented live in October. Health Canada staff gave an overview of national human biomonitoring programs in the Canadian Health Measures Survey, the Maternal-Infant Research on Environmental Chemicals and the Northern Contaminants Program.

The presentation provides an opportunity to learn about these programs, their achievements, how the findings are used within the CMP or how they can be used by others in their own work.

The webinar also shows how to access biomonitoring datasets from the Canadian Health Measures Survey available through the Open Government portal, as well as the complete survey data available to Canadian Researchers through Statistics Canada's Research Data Centres. More information on these programs can be found at the <Human Biomonitoring of Environmental Chemicals webpage>.

Regulations coming for formaldehyde emissions from composite wood products

The Government of Canada expects to publish proposed regulations for formaldehyde emissions from composite wood products in indoor air in 2018.

The move follows a long process of stakeholder consultations that began in March 2017, when the Government

of Canada published a <Notice of Intent> announcing its intention to regulate.

Since that time, Health Canada has launched several stakeholder engagement activities, including introductory webinars (April 2017), a voluntary data-gathering questionnaire (April 2017), an online pre-consultation engagement (July 2017), a <consultation document> (July 2017) and a multi-stakeholder workshop (September 2017).

The workshop was an opportunity to inform stakeholders about the regulatory approach and solicit their feedback. Issues, concerns and suggestions were shared, including overall support for consistency within North America and for effective compliance and enforcement.

More information on the formaldehyde initiative can be found on the <formaldehyde> webpage.

Government taking action on lead in consumer products

The Government of Canada plans to publish new regulations in 2018 that will prohibit the manufacture and import of lead wheel weights destined for the Canadian market.

The government is also considering the development, if warranted, of an approach to encourage the use of lead-free ammunition and lead-free sinkers and jigs in Canada.

Health Canada, in collaboration with Environment and Climate Change Canada, published a risk management strategy for lead in 2013.



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• General news, continued from p. 4 This strategy identifies current and additional Government of Canada action to further reduce Canadians' exposure to lead. It contains clear objectives, performance expectations, and timelines.

Among the objectives, Environment and Climate Change Canada is committed to investigate lead releases from certain consumer products, including wheel weights, ammunition, sinkers/jigs and construction sheeting.

The Government of Canada started stakeholder consultations in 2014, with the publication of a <consultation document on proposed risk management options for lead wheel weights>. This was followed in 2017 by consultations on the key elements of the proposed regulatory approach>.

These informed the development of the new regulations for lead wheel weights, which will be published in the Canada Gazette, Part I.

In addition, Environment and Climate Change Canada commissioned two studies in 2017 to update use pattern information and availability of alternatives for lead ammunition and lead sinkers and jigs.

These studies, along with feedback received from stakeholders during the comment period, will inform an approach, if warranted, to encourage the use of lead-free ammunition and lead-free sinkers and jigs in Canada.

Proposed amendments to the Products Containing Mercury Regulations

Environment and Climate Change Canada is proposing to amend its regulations on products containing mercury to bring them into line with the requirements of the <Minamata Convention on Mercury>, which Canada ratified in April 2017.

The government also intends to propose other amendments to reflect industry trends and standards.

To inform stakeholders of the proposed amendments and provide them with an opportunity to comment in advance of publication of proposed regulations, a consultation document was published in late 2016 for a 60-day comment period.

The <*Products Containing Mercury Regulations>* were published in the Canada Gazette, Part II, in November, 2014. These regulations prohibit the import and manufacture of products containing mercury or any of its compounds, with some exemptions for essential products that have no technically or economically viable alternatives.

More information on the mercury initiative can be found on the <mercury> webpage. ◆

New members for CMP Science Committee

Nine core members have been appointed for the second term of the CMP Science Committee.

Members of the committee possess comprehensive expertise in key scientific areas and will inform scientific considerations under the CMP.

The nine core members of the committee are:

- Dr. Jon Arnot, Arc Arnot Research and Consulting President
- Dr. Niladri Basu, McGill University
 Adjunct Associate Professor of Environmental Health Sciences
- Dr. Richard Becker, American Chemistry Council - Senior

- Director, Science and Research
- Dr. Weihsueh Chiu, Texas A&M University - Professor
- Dr. Miriam Diamond, University of Toronto – Professor, Department of Earth Sciences
- Dr. Michelle Embry, ILSI Health and Environmental Sciences Institute – Associate Director
- Mr. Geoff Granville, GCGranville Consulting – Co-chair
- Dr. Elaine Hubal, United States Environmental Protection Agency
 Acting Director, Computational Exposure Division

 Mr. Mike Rasenberg, European Chemicals Agency – Head of Unit Computational Assessment and Dissemination

The next meeting of the Committee will take place on January 10-11, 2018. Watch the <CMP Science Committee> webpage for more information.

The Science Committee was created in 2013, and since its first meeting in February 2014, it has provided valuable input. Links to reports and meeting records are available on the <CMP Science Committee> webpage. ◆



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Working to improve information-gathering

Information-gathering has always been an important component of the CMP.

In 2017, in time for the most recent inventory update, the government launched an automated Excel tool to facilitate reporting by Canadian companies subject to this mandatory initiative.

The goal was to simplify reporting via Environment and Climate Change Canada's Single Window, in view of the fact that all mandatory and the majority of voluntary initiatives now require online reporting.

To that end, the government regularly conducts presentations and workshops, and provides recorded online information sessions.

The government is also working to enhance transparency. It is reviewing claims for confidentiality in an attempt to provide an appropriate balance between public access to data and protection of confidential information.

The Government of Canada will continue to align its reporting and datasharing practices with international norms in the chemicals management area.

Visit the <Information Gathering Initiatives> webpage for information about ongoing and future initiatives.

The government also encourages feedback about the user's reporting experience, with a view to facilitating information-gathering and streamlining the user's reporting experience. To offer feedback, visit the <Substances Management Information line webpage>.

Recently completed information-gathering initiatives

In September 2017 a <notice> was issued under section 71 of the *Canadian Environmental Protection Act, 1999*, to collect information on 11 microorganisms.

Additionally, the reporting periods have concluded for three section 71 notices (<summer and fall risk management notices>, <2017 Inventory Update>), covering approximately 1,530 substances.

In addition to mandatory activities, targeted voluntary initiatives were also conducted to address data needs for substances included in CMP3.

The participation was approximately 75%, which is considered noteworthy for voluntary initiatives. ◆

STAKEHOLDER ENGAGEMENT

Stakeholder Advisory Council

The Stakeholder Advisory Council is a stakeholder group that contributes to the implementation of the CMP. The Council meets twice a year. Its last meeting was in November 2017, and it is scheduled to meet again in May 2018. <The Council's webpage> provides summary reports of its meetings and activities.

CMP multi-stakeholder workshops

CMP multi-stakeholder workshops are offered twice a year. The next workshop is planned to take place in the spring of 2018.

Get Informed

Do you want to know more about the CMP and its initiatives? The <Chemical Substances section of the Canada.ca website> contains a wealth of information and links to topics of interest.

You can have the latest news emailed to you by <subscribing>.

This feature will also let you know how to be involved in information sessions and consultations.



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Government of Canada taking action on triclosan

On December 13, 2017, Environment and Climate Change Canada published a <consultation document> outlining the key elements of the proposed Pollution Prevention Planning Notice (P2 Notice) for triclosan and inviting stakeholders to provide feedback on the design of the notice.

Products that contain triclosan can be washed off and rinsed down the drain, making their way out of wastewater treatment plants and into waterways, where the substance can affect fish, algae and other aquatic species.

The proposed P2 Notice is designed to reduce the total amount of triclosan from products that are imported into and manufactured in Canada by 30%.

A P2 Notice is a regulatory and enforceable instrument under the Canadian Environmental Protection Act, 1999, that requires companies to prepare and implement a pollution

prevention plan to meet the proposed objectives.

Comments received during the public comment period will be taken into consideration in the proposed P2 Notice, which is expected to be published in the Canada Gazette, Part I for a 60-day comment period no later than November 2018. The final notice is expected to be published in the Canada Gazette, Part I no later than May 2020.

Proposed regulations for volatile organic compounds

Proposed < Regulations Respecting Reduction in the Release of Volatile Organic Compounds (Petroleum Sector) > were published in the Canada Gazette, Part I, on May 27, 2017, for a 60-day comment period.

These proposed regulations would require the implementation of comprehensive leak detection and repair programs at Canadian petroleum refineries, upgraders and certain petrochemical facilities. The operators of these facilities would also be required to modify certain

equipment components to prevent leaks and to monitor the level of certain volatile organic compounds at facility perimeters.

Releases of volatile organic compounds, which include petroleum and refinery gases from facilities in the petroleum and petrochemical sectors, pose health and environmental risks to Canadians. The primary source of fugitive volatile organic compounds releases is leaks from processing equipment components.

Volatile organic compounds are primary precursors to the formation of ground-level ozone and particulate matter, the main constituents of smog. Smog is known to have adverse effects on human health and the environment. In addition, petroleum and refinery gases can potentially contain carcinogenic substances such as 1,3-butadiene, benzene and isoprene. Volatile organic compounds, petroleum and refinery gases and those carcinogenic substances are all on the List of Toxic Substances in Schedule 1 to the Canadian Environmental Protection Act, 1999. ◆

INTERNATIONAL NEWS

The Minamata Convention on Mercury

The first meeting of the Conference of the Parties to the Minamata Convention on Mercury took place from September 24-29, 2017 in Geneva, Switzerland.

Discussions were held on a variety of topics, resulting in the adoption

of trade forms, guidance on atmospheric emissions, national reporting, a budget and a program of work. Canada also played a key role in the establishment of an expert group on the effectiveness evaluation of the treaty. Intersessional work will continue on interim storage, waste thresholds and contaminated sites. The second meeting of the Conference of the Parties will take place in Geneva, Switzerland, on November 19-23, 2018.

The Minamata Convention is a global treaty to protect human health and the environment from human generated emissions and releases of mercury and mercury compounds.



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International, continued from p. 7 As over 95% of the mercury pollution resulting from human activity that is deposited in Canada comes from foreign sources, Canada is a strong proponent of international action on mercury.

Stockholm Committee on Persistent Organic Pollutants

In October 2017, the Persistent Organic Pollutants Review Committee recommended to the Conference of the Parties to the Stockholm Convention that it consider listing pentadecafluorooctanoic acid (PFOA), its salts, and PFOA-related compounds in Annex A to the Convention, with specific exemptions to be further defined at its committee meeting to be held September 2018.

This listing of PFOA will require parties to the Convention to take global action to eliminate the production, use, import and export of the chemical.

The amended recommendation will be considered at the next Conference of the Parties of the Stockholm Convention in the spring of 2019.

PFOA is primarily used as a water, oil and grease repellant; as a surfactant; and as a spreading and wetting agent across many sectors (e.g. in textiles, paper and paints, fire-fighting foams and anti-adhesive in cookware). PFOA and products containing PFOA are prohibited under the *Prohibition of Certain Toxic Substances Regulations*, with a limited number of exemptions.

The Stockholm Convention on Persistent Organic Pollutants is a global treaty to protect human health and the environment from organic chemicals that are persistent, bioaccumulative, toxic to the environment and/or health and are transported long distances, usually to the Arctic where they accumulate.

Given their long-range transport, no single government acting alone can protect its citizens or its environment from these pollutants. In response to this global problem, the Stockholm Convention requires parties to take measures to eliminate or reduce the release of these pollutants into the environment.

The role of the Committee is primarily to scientifically review chemicals and recommend their addition to the Convention for elimination and/or restriction. All work carried out at the last Committee meeting is publically available online.

For information on the Stockholm Convention, see the <Stockholm Convention's> webpage.

International workshop explores economic impact of chemical regulations

Canadian and international regulators had a chance to learn from one another at an OECD workshop on chemicals and economics in the summer of 2017.

The knowledge gained will help Canada and other jurisdictions more effectively assess the economic impacts of chemical regulations. This, in turn, can foster the development of regulations that are both more effective and more economically efficient.

The workshop, entitled Best Practices in Assessing the Social Costs of Selected Chemicals, was hosted by Health Canada on August 30-31, 2017.

It was an opportunity for regulators to learn from each other, and from

leading academics, about how to make the best use of economic tools when developing chemical regulations.

One of the key challenges in developing and analyzing chemical regulations is how to overcome scientific uncertainties and a shortage of economic data on the impacts of chemicals.

At the OECD workshop, member countries shared case studies of what they have done in their own jurisdictions when faced with data gaps and challenging analytical problems. Participants learned from their colleagues, and from leading academics, about what has worked well and what has not in the past.

Approximately 70 Canadian and international experts attended the workshop, including experts in economic research, cost-benefit analysis, risk management, risk assessment, and regulatory design and implementation.

Participants included representatives of the Canadian government, the OECD, the European Chemicals Agency, the European Commission, the Environmental Protection Agency in the U.S., numerous other OECD member governments, the chemical industry, NGOs, and leading academics from numerous international universities and think tanks.

Many participants said they would be able to put the lessons learned from colleagues about what works and what doesn't into use in developing their own regulations.

The Government of Canada regularly works with the OECD and its member countries to develop opportunities, such as the workshop, for collaboration on economic research and analysis in support of chemical management.



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PUBLICATIONS AND NOTICES

Biomonitoring

Health Canada's <Fourth Report on Human Biomonitoring of Environmental Chemicals in Canada>, published in August 2017, presents national data on levels of environmental chemicals in Canadians. The data was collected as part of the Cycle 4 (2014-2015) of the Canadian Health Measures Survey, an ongoing national direct health measures survey. <Further information can be found on the Open Government portal>.

Recent publications

List of publications released between June and December 2017

- <Fourth Report on Human Biomonitoring of Environmental Chemicals in Canada (August, 2017)>
- Consultation on the Triclosan Pollution Prevention Plan

Recent Significant New Activity publications

List of Significant New Activity publications released between June and December 2017

• <June 10, 2017: Notice of intent to amend the Domestic Substances List under subsection 87(3) of the Canadian Environmental Protection Act, 1999, to indicate that subsection 81(3) of that Act applies to the substances benzenamine, 4,4'-methylenebisand formaldehyde, polymer with benzenamine, also known as 4,4'-MDA and pMDA, respectively>.

- <October 28, 2017: Notice of intent to amend the Domestic Substances List under subsection 87(3) of the Canadian Environmental Protection Act, 1999 to indicate that subsection 81(3) of that Act applies to the substance benzenamine, 4,4'-[(1-methylethylidene)bis(4,1-phenyleneoxy)]bis->.
- <June 24, 2017: Significant New Activity Notice 19046 in respect of substance 1,1'-biphenyl, bis(1methylethyl), Chemical Abstracts Service Registry No. 69009-90-1>.
- <July 12, 2017: Significant New Activity Notice: Rescissions of 33 substances>.
- <August 2, 2017: Order 2017-87-06-01 Amending the Domestic Substances List for three substances>.
- Notice of intent to amend the Domestic Substances List under subsection 87(3) of the Canadian Environmental Protection Act, 1999 to vary the significant new activity requirements for DEGME

Coming publications

Titles for the following will be finalized when each item is published in the *Canada Gazette*.

- Publication in Part I of the Canada Gazette of the new proposed Pollution Prevention (P2) Planning Notice for toluene diisocyanates.
- Publication in Part I of the Canada Gazette of the proposed P2 Planning Notice for PREPOD (2-propanone, reaction products with diphenylamine).

- Consultation package on the proposed amendments to the Chromium Electroplating, Chromium Anodizing and Reverse Etching Regulations.
- Consultations on proposed regulations prohibiting asbestos.
- Mercury amendments.
- Coming Mandatory Survey
 Notices (<as per work plan>):
 - Coal tars Notice
 - Micro-organisms Notice
 - Microbeads Notice
 - Nano Notice
 - BPA Notice

Draft screening assessments and risk management scopes (when needed)

- Poly (epoxy resins)
- Fatty amides
- Triarylmethane
- Furan and derivatives
- Benzophenone
- Seven hydrocarbon-based substances
- Dinoseb
- Pigments and dyes
- Anthraquinones
- Cyclohexane, 5-isocyanato-1-(isocyanatomethyl)-1,3,3trimethyl-
- Bacillus cereus
- Trimellitates



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Final screening assessments and risk management approaches (when needed)

- Sulfurized lard oil
- Cellulomonas biazotea and Arthrobacter globiformis
- Bacillus circulans, Bacillus megaterium, Micrococcus luteus and Chaetomium globosum
- Trichoderma reseii
- Cyclohexene, 4-ethenyl-
- Ethylene glycol ethers and monoglyme
- Hexanoic acid, 2-ethyl-, calcium salt and hexanoic acid, 2-ethyl-, 2-ethylhexyl ester
- Bacillus thuringiensis
- Organic flame retardants

Coming Significant New Activity publications

- A Notice of intent to amend the Domestic Substances List to apply the significant new activity provisions of the Canadian Environmental Protection Act, 1999 to one living organism. (SNAc NOI for Trichoderma reesei).
- A Notice of intent to amend the Domestic Substances List to apply the significant new activity provisions of the Canadian Environmental Protection Act, 1999 to one substance. (SNAc NOI for Calcium 2-Ethylhexanoate).
- A Notice of intent to amend the Domestic Substances List to apply the significant new activity provisions of the Canadian Environmental Protection Act, 1999 to one substance. (SNAc NOI for Monoglyme).
- A Notice of intent to amend the Domestic Substances List to apply the significant new activity provisions of the Canadian Environmental Protection Act, 1999 to 14 substances. (SNAc NOI for Rapid Screening IV).
- A Notice of intent to amend the Domestic Substances List to vary the significant new activity provisions of the Canadian Environmental Protection Act, 1999 for 110 substances. (NOI to vary the SNAc requirements for 110 substances under the SNAc Review). ◆

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