

Dear Ms. Pepin,

Thank you for the opportunity to comment on the CEC Proposed Program Plan and Budget: 2002-2004.

The Canadian Chamber of Commerce and our sister organization The Canadian Council for International Business have some specific concerns with the section of the document on the "Sound Management of Chemicals" that we would like to raise at this time.

Products of Commerce being considered as pollutants

Under the "Rationale" section, it is noted that "Chemical pollutants - especially those that are persistent and toxic, that bioaccumulate in living organisms and are transported long distances in environmental media and as products of commerce - have generated a great deal of public and political concern." We take serious issue with products of commerce being considered as pollutants or that products of commerce are being considered as long-range transport of pollutants.

We would recommend the removal of the reference to products of commerce in this statement.

Clustering of chemicals

In the "Project Summary" section, it is noted that one potential approach to chemical management is "the consideration of clusters or groups of chemicals, and specific industrial sectors or industrial complexes". We would like to stress that, while this may be appropriate in some cases, it is very important to ensure that great care is used to ensure that there is sound science behind the decision to consider a particular group of chemicals as a cluster as many chemicals with similar properties offer a varying degree of risk to the environment and/or health and actions to control one chemical might be completely inappropriate for other chemicals that might be included in the same "cluster".

Thank you once again for the opportunity to comment on your workplan for the next three years.

I would be happy to discuss these issues with you at your convenience. My telephone number in Toronto is (416) 868-6415 x228 or I can be reached by email at scampbell@chamber.ca

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