

Canadian Plastics Industry Association  
Association canadienne de l'industrie des plastiques

June 14, 2004

Mr. William Kennedy  
Executive Director  
Commission for Environmental Cooperation  
393, rue St-Jacques Ouest  
Bureau 200  
Montreal (Quebec)  
H2Y 1N9 Canada

Dear Mr. Kennedy:



The Canadian Plastics Industry Association is an association representing suppliers of machinery, molds and materials as well as processors of plastic products. This industry accounts for \$45.8 billion in shipments and 165,200 employees. CPIA is committed to advancing the growth of our plastics industry in an environmentally and socially responsible manner.

We have taken this opportunity to submit comments to you on the NACEC Taking Stock 2000 Report: A Special Report on Toxic Chemicals and Children's Health in North America. We have three main concerns with the report.

Firstly, our overriding concern is the report's insinuation that chemical releases are indicative of children's exposures and adverse health effects. The report does not contain the scientific basis to make these allegations. The data reflect releases and other waste management of chemicals. Release estimates alone are not sufficient to determine exposure or to calculate potential adverse effects on human health and the environment. The report should delete these allegations or substantiate any claim with scientific analyses and be peer reviewed.

Secondly, we are concerned that the report contains a statement that it does not reflect the views of CEC, or the governments of the US, Canada or Mexico. The report contents should be the responsibility of the named governments and the contents vetted by government. In addition, government ownership of the report must be clearly indicated in the report. This will help to ensure the report's credibility.

Thirdly, we are concerned that the CEC report for 2000 has just been published. The releases reported are based on year 2000 yet information is reported by industry annually. A report based on 2000 data does not give a true picture of industry's current efforts to reduce emissions. We have now just received the 2001 Taking Stock report which provides emission trends but is also not reflective of current practices. Effort should be made to report emission releases in the year following the reporting and no later.

Thanks for the opportunity to comment.

Yours truly,

Catherine Cirko  
Vice President, Environment & Health  
Canadian Plastics industry Association

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