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Summary of Existing Regulations Pertinent to Environmental Reporting: Implications for Toronto's Proposed Environmental Reporting & Disclosure Program

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Background

Toronto Public Health (TPH) commissioned the Canadian Institute for Environmental Law and Policy (CIELAP) to research and prepare updated summary information on regulations and legislation that are relevant to the City of Toronto's proposed Environmental Reporting and Disclosure (ERD) Program and implementation program. This report contains CIELAP's findings based on its scan of regulations and legislation relevant to the proposed ERD program.

The ERD program, as proposed by the Medical Officer of Health in a January 2008 consultation document, would require affected facilities to submit to the City annual reports of their use and release of 25 priority chemicals above specified thresholds.

Some stakeholders have expressed concerns that the proposed ERD program duplicates chemical reporting requirements currently in place. Some have also asked TPH to consider whether the goal of the ERD program – to reduce exposure to the priority chemicals – is already being addressed by current or proposed chemical regulations.

The objectives of this report are to provide: an assessment of the extent to which the proposed ERD program duplicates reporting requirements on Toronto facilities, if at all; and a broad assessment of the extent to which the City's proposed bylaw and pollution prevention outreach will provide 'value-added' to key existing regulatory programs aimed at reducing the use and release of priority toxic substances.

CIELAP has prepared this brief summary report to provide our conclusions on the potential for duplication between the City's proposed ERD program and other regulations and legislation, as well as the value added by the proposed ERD program. Attached to the report are two tables setting out detailed summaries of relevant regulations and

legislation: Table 1 addresses the potential for duplication of environmental reporting requirements found in existing regulations and legislation; and Table 2 addresses the potential for overlap with existing, proposed and pending legislation and regulations that are likely to significantly reduce the use or release of priority toxics in Toronto.

Existing Environmental Reporting Requirements

A review of existing and proposed chemical regulations (Table 1) shows that there are no systematic reporting requirements identical to what is being proposed in the ERD program.

The most potential for reporting duplication exists with two federal reporting requirements under the *Canadian Environmental Protection Act* 1999: the National Pollutant Release Inventory (NPRI) and SOR 2003-7 Tetrachloroethylene Use in Drycleaning. However, TPH has designed its proposed program to avoid duplication with these regulations:

- The NPRI requires large facilities to report annual emissions and transfers of 367 substances, including all of the ERD priority chemicals. For Toronto facilities reporting to the NPRI (there were 352 in the year 2006), releases of any ERD substances above the proposed reporting thresholds would have to be reported both to the City and the federal government. TPH has avoided duplication with the NPRI by using the federal OWNERS system, which will allow facilities to simultaneously report to the City and the NPRI on the same website.
- SOR 2003-7 Tetrachloroethylene Use in Drycleaning requires drycleaning facilities to report their annual purchase and disposal to tetrachloroethylene. This information is not required under the ERD program. Facilities may find it useful to enter their purchase and disposal information into the TPH website as a step in estimating their annual use and emissions of tetrachloroethylene.

Existing, Proposed or Pending Legislation and Regulations Aimed at Reducing Use or Release of Priority Toxics

The goal of the ERD program is to reduce the use and release of the 25 priority chemicals, thereby reducing potential human exposure to these substances. Table 2 describes current regulations that also aim to reduce the 25 chemicals.

Toronto's program shares toxics reduction goals in three areas, however it appears to complement the intent of these regulations rather than duplicate them:

- new federal initiatives aimed at reducing emissions of volatile organic compounds (VOCs);
- federal regulations of tetrachloroethylene in drycleaning facilities; and
- a provincial intent to introduce new legislation for reducing toxic substances, but no specifics have been identified at this time.

Value Added by Toronto's Proposed Environmental Reporting & Disclosure Program

Toronto's proposed ERD Program adds value by collecting data from facilities that is not currently collected under any other regulation, and by creating new opportunities for the public to access information about environmental reporting and disclosure in the City.

The reporting requirements proposed under the ERD would predominantly affect small and medium-sized facilities that do not regularly provide environmental data to governments.

Toronto's program also introduces public disclosure of the information, which can stimulate facilities to pursue pollution prevention. With the exception of the searchable internet database containing data collected under the NPRI, none of the environmental reports listed in Tables 1 or 2 are easily accessible to the public.

In some cases, a member of the public would have to make a request for reported data under the *Freedom of Information and Protection of Privacy Act* or the federal *Access to Information Act*.

In the case of certain types of certificates of approval (C of As), a company may be required to make an Emission Summary Table documenting compliance available, at all times, at the facility for inspection by interested members of the public. In addition to this, the Ministry of the Environment must maintain a list of companies who hold C of As, and allow members of the public to inspect a C of A, if requested.

In relation to reporting under the Workplace Hazardous Materials Information System (WHMIS), the public may access this information through a request to the local medical officer of health. WHMIS requires that hazard information be made available to workers and, on request, the public but has no requirements for facilities to report the use or emissions of regulated substances.

The City of Toronto's proposed bylaw will ensure simple, one-stop access by the public to information and data currently difficult to obtain.

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TABLE 1
Implications for Toronto’s Proposed Environmental Reporting & Disclosure Program:
Duplication with Existing Environmental Reporting Requirements

Sector(s) and Specific Substances Regulated	Legislative/Regulatory Authority	Reporting Requirement (including mode of reporting/to whom report made)	Public Access to Information	Duplication, if any, with proposed bylaw
<p>All sectors (regulated substances include: Benzene, Cadmium, Chloroform, Chromium (hexavalent), Chromium (non-hexavalent), 1,4-Dichlorobenzene, Lead, Manganese, Mercury, Nickel, Polycyclic aromatic hydrocarbons, Tetrachloroethylene, Trichloroethylene)</p>	<p>Toronto Sewer Use Bylaw¹</p>	<p>Requires businesses to provide information on the discharge of specified substances to the sanitary or storm sewers</p> <p>Approximately 5,000 Toronto businesses, grouped into 139 sectors, must report if they release any of 54 specific substances to the sanitary sewers or 44 substances to the storm sewers</p> <p>Most facilities are also required to submit pollution prevention (P2) plans</p>	<p>Toronto Water regularly reports the number of violations and summons issued under the by-law to the City’s Works Committee, but these reports may be hard for the general public to find on committee agendas</p> <p>P2 plan summaries are collected but this information is not routinely disclosed</p> <p>Residents must make a Freedom of Information request to obtain summaries of P2 plans</p>	<p>No duplication in reporting</p> <p>ERD would track 13 substances that are currently reported to the Sewer Use Bylaw, but ERD does not require reporting of discharges to sewers or the completion of P2 plans</p>

<p>Any sector releasing acetone to air</p>	<p><i>Environmental Protection Act, O. Reg. 127/01²</i> Ontario's Airborne Contaminant Discharge Monitoring and Reporting Regulation</p>	<p>Originally passed to collect data on the release of 350 airborne contaminants in Ontario, but amended in February 15, 2006, to avoid duplication with NPRI data</p> <p>Covers only release by discharge to air, and not use</p> <p>Currently only applies to reporting of releases of acetone</p>	<p>Prior to eliminating duplication with NPRI, companies posted their data to a searchable public internet site but this is no longer active</p>	<p>No duplication in reporting</p> <p>Acetone is not an ERD priority substance</p>
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<p>All sectors (regulated substances include: Acetaldehyde, Acrolein, Benzene, Cadmium, Carbon tetrachloride, Chloroform, 1,4-Dichlorobenzene, Formaldehyde, Lead, Mercury, Nickel, Nitrogen Oxides, Perchloroethylene, Trichloroethylene; Vinyl chloride)</p>	<p><i>Environmental Protection Act, O. Reg. 419/05³</i> Air Pollution – Local Air Quality</p>	<p>Requires commercial and industrial businesses to meet more stringent emission standards air releases for 344 chemical substances, and notify the Ministry of the Environment of any expected or measured exceedences</p> <p>Standards require facility to demonstrate the concentration of a contaminant is below the prescribed standard when it reaches a Point of Impingement (POI)</p> <p>Also requires Emission Summary and Dispersion Modeling (ESDM) Reporting to provide detailed analysis of pollution output and how the pollution is dispersed to the POI</p> <p>Emissions are reported to the Ministry of the Environment</p>	<p>A member of the public may make a request for reported data under the <i>Freedom of Information and Protection of Privacy Act</i></p>	<p>No duplication in reporting</p> <p>Facilities provide Ministry with modeled estimates of air pollution dispersion and POI levels and reports exceedences above standards</p> <p>Facilities do not report annual use or emissions, which may change over time</p>
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<p>Food and Beverage Manufacturing (regulated substances vary)⁴</p> <p>Clothing Manufacturing (regulated substances vary)⁵</p> <p>Printing and Publishing (regulated substances vary)⁶</p> <p>Chemical Manufacturing (regulated substances vary)⁷</p> <p>Wood Industries (regulated substances vary)⁸</p> <p>Other Manufacturing (regulated substances vary)⁹</p>	<p><i>Environmental Protection Act, s. 9 Certificate of Approval (air)</i>¹⁶</p>	<p>Reporting requirements differ according to the terms and conditions of each individual Certificate of Approval (“C of A”)</p> <p>Many C of As include minimal reporting requirements:¹⁷</p> <p>-Company must retain for at least two years all records and information about facility operation and maintenance, repair and inspection required by the C of A</p> <p>-Records and information must be made available to staff of the Ministry upon request so that staff may verify regulatory compliance, but no regular reporting is required</p> <p>-Company must notify MOE, in writing, of all environmental complaints received and the measures taken to address them</p> <p>Comprehensive C of As¹⁸ likely to include the following:</p> <p>-Company must demonstrate compliance on an ongoing basis with Ontario Regulation 419/05, applicable MOE Guidelines for Air and other performance requirements as specified in their conditions</p> <p>-Company must ensure compliance with</p>	<p>Depends on terms and conditions of C of A</p> <p>Many C of As include no provision for direct public access to the information</p> <p>Under s. 19 of the <i>Environmental Protection Act</i>, MOE must maintain a list of those who hold C of As, and allow members of the public to inspect a C of A, if requested</p> <p>Under the <i>Freedom of Information and Protection of Privacy Act</i> MOE has 30 days to respond to a request for a document, and may charge fees to cover time and photocopying.</p> <p>Comprehensive C of As are likely to require company to make</p>	<p>No duplication in reporting</p> <p>Most C of As depict maximum potential releases at a specific location (usually the property boundary) at a given point in time</p> <p>They do not quantify emissions or chemical use over a period of time</p>
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<p>Chemical Distribution (regulated substances vary)¹⁰</p> <p>Waste Management (regulated substances vary)¹¹</p> <p>Medical and Diagnostic Laboratories (regulated substances vary)¹²</p> <p>Automotive Repair and Maintenance (regulated substances vary)¹³</p> <p>Laundry Services, including Dry Cleaning (regulated</p>		<p>specified performance limits: the maximum concentration of any Compound of Concern¹⁹ at a Point of Impingement (POI) must not exceed the corresponding Ministry POI Limit from O. Reg. 419/05; or for any Compound of Concern that does not have a Ministry Point of Impingement Limit, the maximum concentration of that Compound of Concern at a Point of Impingement must not be greater than a level assessed as part of the original ESDM Report, or greater than the Maximum Concentration Level Assessment submitted to and accepted by MOE</p> <p>-Company must maintain documentation (for at least seven years) describing the current operations of the Facility, including a current ESDM Report demonstrating compliance with the Performance Limits regarding all Compounds of Concern, an up-to-date Log describing each Modification to the Facility, and a record of changes to the ESDM Report that documents how each Modification is in compliance with the Performance Limits</p> <p>-Company must provide access to MOE staff, upon request, so that the MOE can determine if a more detailed review of compliance with the Performance Limits is necessary</p>	<p>available, at all times, at the facility for inspection by interested members of the Public, a table (Emission Summary Table) that documents the facility's compliance with O. Reg. 419/05</p> <p>The Emission Summary Table should include a summary of significant contaminants, the aggregate facility-wide emission rate, the maximum POI concentrations and comparison to MOE POI limits²⁰</p> <p>Notice of proposed C of As are posted on the <i>Environmental Bill of Rights</i> Environmental Registry for a minimum public comment period of 30 days</p>	
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<p>substances vary)¹⁴</p> <p>Funeral Services (regulated substances vary)¹⁵</p>		<p>-Company must provide MOE annually with a Summary of activities in the previous year, including compliance with the Performance Limits, modifications that took place and resulted in a change in the previously calculated concentration at the POI for any Compound of Concern, a list of each Compound of Concern, a review of any changes to a Ministry POI undertaken in the previous calendar year that affect a Compound of Concern emitted from the Facility, a summary of the changes in the emission rate of any Compound of Concern and the resulting increase or decrease in the POI concentration reported in the ESDM Report and Emission Summary Table</p> <p>C of A does not specify whether reporting is be done on paper or electronically</p>	<p>Subject to EBR review and comment – documents have recently begun to be posted with decisions</p>	
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<p>Waste Management²¹ (regulated substances vary)</p>	<p><i>Environmental Protection Act, s. 27 Certificate of Approval (waste disposal site)</i>²²</p>	<p>Reporting requirements differ according to the terms and conditions of each individual C of A</p> <p>Waste C of As²³ may require preparation of an annual written report including the following minimum information: a detailed monthly summary of the type and quantity of all incoming and outgoing wastes and the destination of all outgoing wastes; any environmental and operational problems, that could negatively impact the environment, encountered during the operation of the Site and during the facility inspections and any mitigative actions taken; and any recommendations to minimize environmental impacts from the operation of the Site and to improve Site operations and monitoring programs in this regard</p> <p>Annual Report must be kept on-site and made available to MOE Provincial Officers on request</p> <p>Any information and records requested by MOE concerning the Site and its operation under this C of A, must be provided to MOE in a timely manner, upon request</p> <p>C of A does not specify whether reporting is be done on paper or electronically</p>	<p>Depends on terms and conditions of C of A</p> <p>Many C of As include no provision for direct public access to the information</p> <p>One waste C of A states: Any information relating to this Certificate and contained in Ministry files may be made available to the public in accordance with the provisions of the <i>Freedom of Information and Protection of Privacy Act</i>²⁴</p> <p>Under the <i>Freedom of Information and Protection of Privacy Act</i> MOE has 30 days to respond to a request for a document, and may charge fees to cover time and</p>	<p>No duplication of reporting</p> <p>ERD does not require reporting of disposal of substances</p> <p>Tracking some wastes, such as spent solvents, should aid facilities in estimating use and emissions for proposed ERD</p>
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			<p>photocopying.</p> <p>Under s. 19 of the <i>Environmental Protection Act</i>, MOE must maintain a list of those who hold C of As, and allow members of the public to inspect a C of A, if requested</p>	
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<p>Food and Beverage Manufacturing</p> <p>Chemical Manufacturing</p> <p>Other Manufacturing</p> <p>Waste Management²⁵</p> <p>(regulated substances vary)</p>	<p><i>Ontario Water Resources Act, s. 53 Certificate of Approval (sewage works)</i>²⁶</p>	<p>Reporting requirements differ according to the terms and conditions of each individual C of A</p> <p>Sewage works C of As²⁷ may require reporting that includes:</p> <ul style="list-style-type: none"> -Preparation and submission of a performance reports, including a summary and comprehensive interpretation of all monitoring data and analytical data collected and a comparison to the effluent quality criteria described in the C of A, and a description of operating problems encountered and corrective actions taken -Submission of analytical results and flow volume records to MOE, monthly or as specified by MOE -Reports to MOE of the exceedence of any parameter specified in the C of A orally, as soon as reasonably possible, and in writing within seven days of the exceedence -An annual report to be submitted to MOE <p>C of A does not specify whether reporting is be done on paper or electronically</p>	<p>Depends on terms and conditions of C of A</p> <p>Many C of As include no provision for direct public access to the information</p> <p>Under s. 13 of the <i>Ontario Water Resources Act</i>, MOE must maintain a list of those who hold C of As, and allow members of the public to inspect a C of A, if requested</p> <p>Under the <i>Freedom of Information and Protection of Privacy Act</i> MOE has 30 days to respond to a request for a document, and may charge fees to cover time and photocopying.</p>	<p>No duplication of reporting</p> <p>ERD does not require reporting of releases to sewers</p> <p>Limited public access to information</p>
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<p>Chemical Manufacturing</p> <p>Other Manufacturing</p> <p>(regulated substances include: Nitrogen oxides Nickel)</p>	<p><i>Environmental Protection Act and O. Reg. 194/05 Industry Emissions – Nitrogen Oxides and Sulphur Dioxide</i>²⁸</p>	<p>Regulation applies NOx and SO2 limits to seven large industrial sectors: iron and steel, cement, petroleum, pulp and paper, glass, carbon black, and base metal smelting</p> <p>Facility owner must ensure that emissions of nitrogen oxides emitted from the facility during the year are monitored, calculated and reported, and must submit an annual report of the amount of nitrogen oxides emitted from the facility in the smog and non-smog seasons in the year (records must be kept for five years after submission)</p>	<p>There does not appear to be direct public access to reports submitted under this regulation. However, a member of the public could make a request under the <i>Freedom of Information and Protection of Privacy Act</i></p>	<p>No duplication in reporting</p> <p>There is potential duplication in reporting NOx and SOx emissions, but this regulation applies to very large facilities and no Toronto facilities currently report under this regulation</p>
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All sectors	<i>Environmental Protection Act, s. 92 and O. Reg. 675/98 Spills Reporting</i> ²⁹	<p>If a pollutant is spilled or discharged, the discharger must report it to MOE and the municipality as quickly as possible</p> <p>MOE then proceeds with compliance activities</p> <p>Form of reporting (paper or electronic) not specified</p>	<p>MOE informs the public of environmental compliance activities on its website through: news releases on convictions of violators; environmental compliance reports; and annual reports³⁰</p>	<p>No duplication in reporting</p> <p>These reports are only made in the event of a spill emergency and do not cover regular emissions</p>
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<p>Waste management</p> <p>Potentially all sectors</p> <p>(regulated substances include: Acetaldehyde, Acrolein, Benzene, Cadmium, Carbon tetrachloride, Chloroform, Chromium, 1,4-Dichlorobenzene, 1,2-Dichloroethane, Dichloromethane, Ethylene dibromide, Formaldehyde, Lead, Mercury, Nickel, Nitrogen Oxides, Tetrachloroethylene (perchloroethylene), Trichloroethylene Vinyl chloride)</p>	<p><i>Environment al Protection Act, Reg. 347 – General - Waste Management</i> ³¹</p>	<p>Requires the registration of generators of hazardous and liquid industrial waste, and the use of manifests to register the wastes by type and quantity of these wastes when they are transferred or discharged into sewage works</p> <p>Schedules to Reg. 347 lists substances included in the definition of hazardous waste, as well as those exempted</p> <p>Reporting is to MOE electronically through the Hazardous Waste Information Network (HWIN)³²</p>	<p>Public may gain access to limited information on the HWIN for a fee of \$150</p> <p>Fee allows access to a Public Information Data Set that includes specific information provided on the generator registration report and manifest used to track the waste: the company name and address; waste numbers (types); and volumes generated</p>	<p>No duplication in reporting</p> <p>Act covers the transfer of chemicals in hazardous wastes, but not emissions</p> <p>Also only reports total quantity of wastes, not specific chemicals within waste</p>
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	<p><i>Environmental Protection Act, Part XV.1 Record of Site Conditions</i>³³</p>	<p>Requires documentation that a brownfield property under redevelopment has been properly assessed and meets the soil, sediment and groundwater standards appropriate for redevelopment</p> <p>Record must indicate what action will be taken if site cleanup is required</p> <p>Records of Site Condition are publicly available on the internet through the Ministry of the Environment's Brownfields Site Registry</p>	<p>Residents may search by municipality, street name or property owner</p> <p>Information is made available on the Registry after assessments and cleanup activities have been proposed</p>	<p>No duplication of reporting</p> <p>Records of Site Conditions describe substance levels in the soil, sediment and groundwater, but do not collect data related to the operation or emissions of the facility on the site</p>
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	<p><i>Environmental Bill of Rights</i>³⁴</p>	<p>Provides formal rights to Ontario residents to know about and participate in government decisions that have a significant environmental impact</p> <p>The government posts notice of all proposed policies, Acts, regulations and instruments that are deemed to be environmentally significant through a public registry available on the internet</p> <p>Provides a public comment period of at least 30 days for input on proposals</p>	<p>Provides an opportunity for public input on environmental decisions</p>	<p>No duplication of reporting</p>
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	<p><i>Safe Drinking Water Act</i>³⁵ and Drinking Water Systems, O. Reg. 170/03</p>	<p>Mandates annual reports on water quality</p> <p>Requires public notices whenever municipal drinking water systems are out of compliance with provincial standards</p>	<p>Annual drinking water quality reports must be promoted and made available to the public</p> <p>Residents may obtain results of water tests and any approvals and orders issued since January 1, 2001 from the operator of a drinking water system</p> <p>City of Toronto makes this information available on the Internet and in hard copy in libraries and civic centres</p>	<p>No duplication in reporting</p> <p>ERD program will not require reporting of substances in drinking water systems</p>
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All sectors	<p><i>Occupational Health and Safety Act, Part IV³⁶ and Reg. 860³⁷</i></p> <p>Workplace Hazardous Materials Information System (WHMIS)</p>	<p>WHMIS is a federally-mandated program that requires the manufacturers of hazardous chemicals or products to provide health hazard information about these substances to those using them in the workplace</p> <p>Information is provided in a Material Safety Data Sheet (MSDS) accompanying the product when it is shipped to a facility</p> <p><i>Occupational Health and Safety Act</i> and Reg. 860 support WHMIS by requiring that employer assess materials used in their workplaces to: determine whether they are hazardous; ensure that they are properly labeled; make MSDSs available to workers; and provide appropriate health and safety training</p> <p>Controlled products defined under Part IV of the federal <i>Controlled Products Regulations</i> are designated as hazardous materials</p> <p>MSDSs from a site do not indicate the volume of the substances identified, what substances are actually present in a facility at a given time, or the most up-to-date hazard information</p>	<p>Workers, local medical officers of health, local fire departments and the Ministry of Labour may request copies of MSDSs from an employer</p> <p>The public may also request this information from the medical officer of health</p>	<p>No duplication in reporting</p> <p>WHMIS requires that hazard information be made available to workers and, on request, the public</p> <p>WHMIS has no requirements for facilities to report the use or emissions of regulated substances</p>
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<p>All sectors (regulated substances include most of the 25 priority chemicals)</p>	<p>Canadian Environmental Protection Act, 1999, National Pollutant Release Inventory³⁸</p>	<p>Canada-wide program that requires facilities to report each year on the release, disposal and transfer of any of 323 hazardous substances</p> <p>Companies must report to the NPRI if they have 10 or more full-time employees (or an equivalent of 20,000 worker-hours each year) and use the listed substances in quantities of more than 10 tonnes and in concentrations of greater than 1 per cent</p>	<p>Annual data are gathered by Environment Canada and made publicly available in print and via a searchable internet database</p> <p>Information is 2-3 years out of date due to the time required to collect, analyze and report data</p>	<p>Potential duplication in reporting for ~300 large facilities in Toronto currently reporting to NPRI</p> <p>TPH has avoided duplication by harmonizing reporting with federal government OWNERS system</p>
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<p>All sectors (regulated substances include: Acetaldehyde, Acrolein, Benzene, 1,3-Butadiene, 1,2-Dichloroethane, Formaldehyde, Mercury, Nitrogen oxides, Vinyl chloride)</p>	<p>Canadian Environmental Protection Act, 1999, Environmental Emergency Regulations, SOR/2003-307³⁹</p>	<p>Requires companies that use or store relatively large quantities of any of 172 potentially hazardous substances, such as explosive or radioactive substances, to develop Environmental Emergency (E2) Plans</p> <p>Facilities must keep detailed E2 plans on site and notify the federal government and appropriate local emergency response personnel that the plans exist</p> <p>As of June 2006, 25 Toronto facilities were identified as having developed these E2 plans</p>	<p>When there is an emergency, this information is made available to the appropriate agencies</p> <p>The data is not easily available to the community – the list of facilities that have plans, but not the substances involved, is available via the Internet through controlled access</p>	<p>No duplication in reporting</p> <p>ERD does not require storage information or E2 plans</p>
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<p>Laundry Services, including Dry Cleaning</p> <p>(regulated substances include: Tetrachloroethylene/perchloroethylene)</p>	<p>Canadian Environmental Protection Act, 1999, SOR/2003-7 Tetrachloroethylene (Use in Dry Cleaning and Reporting Requirements) Regulations⁴⁰</p>	<p>Includes reporting requirements for importers, recyclers and vendors of tetrachloroethylene</p> <p>Owner or operator of a dry-cleaning facility using tetrachloroethylene must:</p> <ul style="list-style-type: none"> -Maintain books and records on the purchase of tetrachloroethylene for dry cleaning, the transport of waste water or residue to a waste management facility or the treatment of waste water; and -Submit to the federal Environment Minister a separate report for each dry-cleaning facility, no later than 120 days after the end of each calendar year, in a form determined by the Minister and containing specified information that includes: quantity in kilograms of tetrachloroethylene purchased, and waste water and residue transported to waste facilities <p>It appears that paper reporting is required. Sample reporting forms are available online⁴¹</p>	<p>There does not appear to be public access to reports submitted under this regulation</p> <p>However, a member of the public could make a request under the federal <i>Access to Information Act</i></p>	<p>No duplication in reporting</p> <p>The proposed ERD does not require these facilities to report the same information, but this information would be necessary for them to estimate usage and emissions as required by the City</p> <p>Effectively, complying with the federal requirements will enable drycleaners to obtain information to participate in Toronto's program</p>
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<p>Waste management</p> <p>Potentially all sectors</p> <p>(regulated substances include: Acetaldehyde, Acrolein, Benzene, Cadmium, Ethylene dibromide, Formaldehyde, Lead, Nickel)</p>	<p>Canadian Environmental Protection Act, 1999, SOR/2002-301 Interprovincial Movement of Hazardous Waste Regulations⁴²</p>	<p>Requires hazardous waste transported within Canada be accompanied by a manifest completed by the person in possession of the waste immediately before it is transported</p> <p>Manifest must indicate the shipping name and classification of the hazardous waste</p> <p>The person in possession of the hazardous waste immediately before it is transported must send a copy of the partially completed manifest to the authorities of the province where the waste originated and the province of destination, within three days after it is transported</p> <p>The person to whom the hazardous waste is being transported must ensure that copies of the completed manifest are sent to the province where the waste originated and the province of destination, within three days after receiving the waste</p> <p>The persons in possession of the hazardous waste immediately before it is transported and to whom the hazardous waste is being transported must keep a copy of the manifest at their principal places of business in Canada for a period of two years after the waste is received</p>	<p>There does not appear to be public access to reports submitted under this regulation. However, a member of the public could make a request under the federal <i>Access to Information Act</i></p>	<p>No duplication in reporting</p> <p>Reporting covers the transfer of chemicals in hazardous wastes, but not use or emissions</p>
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TABLE 2
Implications for Toronto’s Proposed Environmental Reporting & Disclosure Program:
Existing, Proposed or Pending Legislation and Regulations
Likely to Significantly Reduce Use or Release of Priority Toxics in Toronto

Sector(s) and Specific Substances Regulated (including exempted sectors/other substances where known)	Legislation/Regulation	Requirements that would require reductions in use/release of priority toxics (Any public reporting requirements)	Timelines (for coming into effect and implementation)	Overlap, if any, with proposed bylaw
All sectors	<p>Promised Ontario toxic reduction law that would require companies to reduce toxic emissions</p> <p>(Proposed)</p>	Nothing specific announced yet – government has announced Members of the Toxics Reduction Scientific Expert Panel	<p>2008 Budget announced March 25, 2008 included commitment to provide \$41 million over four years to support the development of toxics legislation and a toxics reduction strategy that will require companies that emit toxic substances to reduce emissions over time</p> <p>Government plans to work with Cancer Care Ontario and the Ontario Medical Association to identify, target and reduce the number of cancer-causing agents released in the environment</p>	<p>Unlikely potential for overlap</p> <p>Province not expected to lower NPRI reporting thresholds, rather to focus new reporting on existing NPRI facilities</p>

<p>Chemical Manufacturing</p> <p>Other Manufacturing</p> <p>(regulated substances include: Nitrogen oxides)</p>	<p><i>Environmental Protection Act and O. Reg. 194/05 Industry Emissions – Nitrogen Oxides and Sulphur Dioxide</i>⁴³</p> <p>(Existing)</p>	<p>Regulation applies NOx and SO2 limits to seven large industrial sectors: iron and steel, cement, petroleum, pulp and paper, glass, carbon black, and base metal smelting</p> <p>Facility owner must ensure that emissions of nitrogen oxides emitted from the facility during the year are monitored, calculated and reported, and must submit an annual report of the amount of nitrogen oxides emitted from the facility in the smog and non-smog seasons in the year (records must be kept for five years after submission)</p> <p>There does not appear to be public access to reports submitted under this regulation. However, a member of the public could make a request under the <i>Freedom of Information and Protection of Privacy Act</i></p>	<p>Requires significant NOx and SO2 emissions reductions by 2010 and further reductions by 2015, leading to a 21 per cent reduction in NO x from 1990 levels and a 46 per cent reduction in SO 2 from 1994 levels for capped industries</p>	<p>Shares ERD goal of reducing NOx emissions, but only applies to certain large sectors. No duplication, as will not engage Toronto facilities</p> <p>ERD will contribute to reducing NOx by engaging small and medium sized facilities</p>
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<p>Laundry Services, including Dry Cleaning</p> <p>(regulated substances include: Tetrachloroethylene/ (perchloroethylene)</p>	<p>Canadian Environmental Protection Act, 1999, SOR/2003-7</p> <p>Tetrachloroethylene (Use in Dry Cleaning and Reporting Requirements) Regulations⁴⁴</p> <p>(Existing)</p>	<p>Includes reporting requirements for importers, recyclers and vendors of tetrachloroethylene</p> <p>Owner or operator of a dry-cleaning facility using tetrachloroethylene must maintain books and records on the purchase of tetrachloroethylene for dry cleaning, the transport of waste water or residue to a waste management facility or the treatment of waste water</p> <p>There does not appear to be public access to reports submitted under this regulation. However, a member of the public could make a request under the <i>Access to Information Act</i></p>	<p>Owner or operator must submit to the federal Environment Minister a separate report for each dry-cleaning facility, no later than 120 days after the end of each calendar year, in a form determined by the Minister and containing specified information that includes: quantity in kilograms of tetrachloroethylene purchased, and waste water and residue transported to waste facilities</p>	<p>Shares ERD goal of reducing tetrachloroethylene use in drycleaning sector</p> <p>Reporting requirement could ease compliance with ERD, as it will give drycleaners info needed to report to ERD</p>
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<p>Automotive Repair and Maintenance</p> <p>(regulated substances include: Volatile organic compounds)</p>	<p><i>Canadian Environmental Protection Act, 1999</i></p> <p>Proposed Elements for Regulations Limiting the Content of Volatile Organic Compounds (VOCs) in Automotive Refinish Coatings and Surface Cleaners⁴⁵</p> <p>(Proposed)</p>	<p>Proposed regulations would set mandatory limits on the VOC content of automotive refinish coatings, and apply to the manufacture, import, and sale of these products in Canada</p> <p>Manufacturers and importers of automotive refinish coatings or surface cleaners would be required to maintain a record, for at least 5 years, that includes product name, type of coating and VOC content in grams per litre</p> <p>Record would be kept at principal place of business, in writing or an electronic format, and provided to Environment Minister on request</p> <p>No proposal for public access to reports</p>	<p>Proposed effective dates for regulatory requirements of January 1, 2009 for coatings and primers, and January 1, 2010 for adhesion promoters</p> <p>Consultations on proposed regulations took place during fall 2006, and public comments were due Dec. 15, 2006</p>	<p>Shares ERD goal of reducing VOCs within chemical mfg and autobody sectors, but designed for product design rather than chemical use and emissions</p> <p>Would reduce VOC emissions from manufacture and use of automotive coatings</p> <p>ERD would continue to require reporting as way of identifying local sources and P2 activities</p>
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<p>Chemical Manufacturing</p> <p>Other Manufacturing</p> <p>(regulated substances include: Volatile organic compounds)</p>	<p><i>Canadian Environmental Protection Act, 1999</i></p> <p>Environment Canada Proposed Regulations to Limit Volatile Organic Compound (VOC) Content in Consumer Products (Personal Care, Household, Automotive Aftermarket and Adhesive Products)⁴⁶</p> <p>(Proposed)</p>	<p>Proposed regulations would mandate VOC content limits for 98 categories of consumer products, and apply to manufacturers, importers, distributors and retailers of consumer products sold in Canada</p> <p>There would be a reporting requirement for this regulation, but the exact nature of the reporting requirements will be proposed during the consultation process – possibilities include reporting of VOC product content to Environment Canada and record keeping provisions</p> <p>No proposal for public access to reports</p>	<p>Proposed effect date for regulatory requirements of January 1, 2009</p> <p>Consultations on discussion document took place during fall 2006, and public comments were due Oct. 31, 2006</p>	<p>Shares ERD goal of reducing VOCs within manufacturing sector</p> <p>Would reduce VOC emissions from manufacture of consumer products</p> <p>ERD would continue to require reporting as way of identifying local sources and P2 activities</p>
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<p>Chemical Manufacturing</p> <p>Other Manufacturing</p> <p>(regulated substances include: Volatile organic compounds)</p>	<p><i>Canadian Environmental Protection Act, 1999</i></p> <p>Environment Canada Proposed Regulations to Limit Volatile Organic Compound (VOC) Content in Architectural and Industrial Maintenance (AIM) Coatings⁴⁷</p> <p>(Proposed)</p>	<p>Proposed regulations would mandate VOC content limits for 50 categories of AIM coatings, and apply to manufacturers and importers of AIM coatings sold in Canada</p> <p>There would be a reporting requirement for this regulation – possibilities include reporting of VOC product content to Environment Canada and record keeping provisions</p> <p>No proposal for public access to reports</p>	<p>Effective date for the regulation to be determined through the consultation process</p> <p>Consultations on discussion document took place from spring 2005 to fall 2006⁴⁸</p>	<p>Shares ERD goal of reducing VOCs within manufacturing sector</p> <p>Would reduce VOC emissions from manufacturing sector</p> <p>ERD would continue to require reporting as way of identifying local sources and P2 activities</p>
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<p>Chemical Manufacturing</p> <p>Other Manufacturing</p> <p>(regulated substances include: Benzene, Mercury, Nitrogen oxides, Volatile organic compounds, Particulate matter)</p>	<p>Canadian Environmental Protection Act, 1999 – Turning the Corner Proposed Regulatory Framework for Air Emissions⁴⁹</p> <p>(Proposed)</p>	<p>Proposal to establish national fixed emissions "caps" for industrial pollutants causing smog and acid rain</p> <p>Proposed regulations would set out emission reductions targets specifying maximum level of pollutant that can be emitted from each industrial sector in a given year, for national reductions from 2006 emission levels for each pollutant</p> <p>Proposed regulations to cover facilities in these sectors: electricity produced by combustion, upstream oil and gas, downstream petroleum, base metal smelters, iron and steel, some mining sectors, cement, forest products, and chemicals production</p> <p>Proposed framework to require monitoring and reporting to ensure compliance assessment and transparency</p>	<p>Targets will come into effect between 2012 and 2015 to give industry time to make necessary investments in plant and equipment processes</p> <p>On December 8, 2007, federal government published a Notice under section 71 of <i>CEPA 1999</i> with respect to reporting information on air pollutants, greenhouse gases and other substances for the 2006 calendar year</p> <p>Notice requires target industries to provide information on their emissions of air pollutants for the year 2006 by May 31, 2008 as part of the regulatory development process⁵⁰</p>	<p>Shares ERD goal of reducing emissions of several ERD substances, but only applies to certain large sectors</p> <p>No Toronto facilities currently engaged in this framework</p>
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<p>Chemical Manufacturing</p> <p>Other Manufacturing</p> <p>(regulated substances include: forms of Benzene, 1,3-Butadiene, Nickel)⁵¹</p>	<p>Canadian Environmental Protection Act, 1999 – Chemicals Management Plan⁵²</p> <p>(Existing)</p>	<p>Federal government plan for risk assessment and management actions for priority chemicals, following the categorization of 23,000 existing chemical substances completed September 2006</p> <p>Categorization identified 200 chemical substances that are potentially harmful to human health or the environment and designated them as the highest priorities for risk assessment and appropriate controls</p> <p>Government is using existing tools and regulations to challenge industry to provide new information about how it is managing these 200 chemical substances, after which the government will decide on further actions to be taken</p>	<p>In response to a challenge under s. 71 of <i>CEPA 1999</i>, industry and stakeholders have been providing Environment Canada and Health Canada with information on how they are using and managing the chemicals in batches of 15 to 30 substances every three months since February 2007 and this will continue for a three-year timeframe while the 200 chemical substances are assessed⁵⁴</p>	<p>May play complementary role in assessing chemicals for possible reductions</p> <p>No reporting element to federal program</p>
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		Results of industry challenge reporting are not directly available to public but government is consulting with public on resulting draft screening assessments and risk management scope documents ⁵³		
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Endnotes

¹ See http://www.toronto.ca/legdocs/municode/1184_681.pdf.

² See http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_010127_e.htm.

³ See http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_050419_e.htm.

⁴ An example of an Environmental Registry decision notice of a Comprehensive C of A (air) for a company in the Food and Beverage Manufacturing Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAwNTA2&statusId=MTUxODY3&language=en>. It includes a link to the final C of A document.

⁵ An example of an Environmental Registry proposal notice of a C of A (air) for a company in the Clothing Manufacturing Sector, is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAyNTUw&statusId=MTUzMzEz&language=en>.

⁶ An example of an Environmental Registry decision notice of a C of A (air) for a company in the Printing and Publishing Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAxOTYw&statusId=MTUzODc3&language=en>. It includes a link to the final C of A document. An example of a decision notice of a Comprehensive C of A (air) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MjkwMzE=&statusId=MTUxOTg3&language=en>.

⁷ An example of an Environmental Registry decision notice of a C of A (air) for a company in the Chemical Manufacturing Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MjY2MjM=&statusId=MTUyOTU0&language=en>. An example of a decision notice of a Comprehensive C of A is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MjgyNDg=&statusId=MTUzOTYw&language=en>.

⁸ An example of an Environmental Registry decision notice of a C of A (air) for a company in the Wood Industries Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAwODgx&statusId=MTUzODcy&language=en>. It includes a link to the final C of A document. An example of a proposal notice of a Comprehensive C of A (air) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAyODMw&statusId=MTUzNjY4&language=en>.

⁹ An example of an Environmental Registry decision notice of a Comprehensive C of A (air) for a company in one of the Other Manufacturing Sectors is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAwOTY3&statusId=MTUzODQw&language=en>. It includes a link to the final C of A document. An example of a proposal notice of another C of A (air) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAzMDEw&statusId=MTUzOTY0&language=en>.

¹⁰ An example of an Environmental Registry decision notice of a Comprehensive C of A (air) for a company in the Chemical Distribution Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MjMzNjA=&statusId=MjMzNjA=&language=en>. An example of a proposal notice of a C of A (air) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAxNTk0&statusId=MTUxODM3&language=en>.

¹¹ An example of an Environmental Registry proposal notice of a C of A (air) for a company in the Waste Management Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAyNzIy&statusId=MTUzNTIz&language=en>.

¹² An example of an Environmental Registry decision notice of a Comprehensive C of A (air) for a company in the Medical and Diagnostic Laboratories Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAxOTEy&statusId=MTUyNzQ4&language=en>. It includes a link to the final C of A document. An example of a proposal notice of a C of A (air) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAyOTI4&statusId=MTUzODIw&language=en>.

¹³ An example of an Environmental Registry decision notice of a C of A (air) for a company the Automotive Repair and Maintenance Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAxNjgy&statusId=MTU0MDU5&language=en>. It includes a link to the final C of A document. An example of a proposal notice of a C of A (air) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAxMjgw&statusId=MTUxMzYw&language=en>.

¹⁴ An example of an Environmental Registry decision notice of a C of A (air) for a company in the Laundry Services/Dry Cleaning Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAwNDE2&statusId=MTUyMzM4&language=en>. It includes a link to the final C of A document. An example of a proposal notice of a Comprehensive C of A (air) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAyNjU3&statusId=MTUzNDU1&language=en>.

¹⁵ An example of an Environmental Registry decision notice of a C of A (air) for a company in the Funeral Services Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=Mjc4MDE=&statusId=MTUwNzM3&language=en>. An example of a proposal notice of a C of A (air) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAxNTc2&statusId=MTUxODE5&language=en>.

¹⁶ See http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90e19_e.htm#BK10.

¹⁷ See example at <http://www.environet.ene.gov.on.ca/instruments/0503-77CJ47-13.pdf>.

¹⁸ See example at <http://www.environet.ene.gov.on.ca/instruments/2750-72FL95-13.pdf>.

¹⁹ C of As define a Compound of Concern as a contaminant that, based on generally available information, may be emitted to the atmosphere in a quantity from any source at a Facility that is significant either in comparison to the relevant Ministry Point of Impingement Limit or if a Ministry Point of Impingement Limit is not available for the compound then, based on generally available toxicological information, the compound has the potential to cause an adverse effect as defined by the *Environmental Protection Act* at a Point of Impingement.

There is no list of Compounds of Concern, but the contaminants listed in O. Reg. 419/05 include the following priority chemicals: Acetaldehyde; Acrolein; Benzene; Cadmium; Carbon tetrachloride; Chloroform; 1,4-Dichlorobenzene; Formaldehyde; Lead; Mercury; Nickel; Nitrogen Oxides; Perchloroethylene; Trichloroethylene; and Vinyl chloride.

²⁰ MOE, *Procedure For Preparing an Emission Summary and Dispersion Modelling Report*, v. 2.0, July 2005: <http://www.ene.gov.on.ca/envision/gp/3614e02.pdf>.

²¹ Examples of Environmental Registry decision notices of C of As (waste disposal site) for companies in the Waste Management Sector are available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAyMDgw&statusId=MTUzMzU2&language=en> and <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAxNDU4&statusId=MTUzNjY0&language=en>. They include links to the final C of A documents. An example of a proposal notice of a C of A (waste disposal site) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAyNjQy&statusId=MTUzNDQ1&language=en>.

²² See http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90e19_e.htm#BK31.

²³ See example at <http://www.environet.ene.gov.on.ca/instruments/5583-78WTF4-13.pdf>.

²⁴ See example at <http://www.environet.ene.gov.on.ca/instruments/4327-75FU9Z-13.pdf>.

²⁵ An example of a Environmental Registry decision notice of a C of A (sewage works) for a company in the Waste Management Sector is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTAyNDQ0&statusId=MTUzOTY3&language=en>. It includes a link to the final C of A document. An example of another decision notice of a C of A (sewage works) is available at <http://www.ebr.gov.on.ca/ERS-WEB-External/displaynoticecontent.do?noticeId=MTk2NjU=&statusId=MTk2NjU=&language=en>.

²⁶ See http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90o40_e.htm#BK83.

²⁷ See example at <http://www.environet.ene.gov.on.ca/instruments/8959-798SJQ-13.pdf>.

²⁸ See http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_050194_e.htm.

²⁹ See http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90e19_e.htm#BK92 and http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_980675_e.htm.

³⁰ MOE, Compliance Policy – Applying Abatement and Enforcement Tools, May 2007: <http://www.ene.gov.on.ca/en/about/penalties/CompliancePolicy.pdf>

³¹ See http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_900347_e.htm.

³² See <https://www.hwin.ca/hwin/index.jsp>.

³³ See http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90e19_e.htm#BK197.

³⁴ See http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_93e28_e.htm.

³⁵ See http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_02s32_e.htm.

³⁶ See http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90o01_e.htm#BK34.

³⁷ See http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_900860_e.htm.

³⁸ See http://www.ec.gc.ca/pdb/npri/npri_home_e.cfm.

³⁹ See http://laws.justice.gc.ca/en/ShowFullDoc/cr/SOR-2003-307//20080406/en?command=HOME&caller=SI&search_type=all&shorttitle=Environmental%20Emergency&day=6&month=4&year=2008&search_domain=cr&showall=L&statuteyear=all&lengthannual=50&length=50.

⁴⁰ See <http://laws.justice.gc.ca/en/ShowFullDoc/cr/SOR-2003-79///en>.

⁴¹ Sample reporting forms available at: http://www.pyr.ec.gc.ca/dryclean/annualreport_e.htm.

⁴² See <http://laws.justice.gc.ca/en/ShowFullDoc/cr/SOR-2002-301///en>.

⁴³ See http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_050194_e.htm.

⁴⁴ See <http://laws.justice.gc.ca/en/ShowFullDoc/cr/SOR-2003-79///en>.

⁴⁵ For proposed regulatory requirements, see: <http://www.ec.gc.ca/nopp/voc/docs/autoRef/en/autoref2006-10-24.cfm#7>.

⁴⁶ For discussion document on proposed regulatory requirements, see: http://www.ec.gc.ca/Nopp/voc/docs/ConsProd/EN/consprods_toc.cfm.

⁴⁷ For discussion document on proposed regulatory requirements, see: <http://www.ec.gc.ca/nopp/DOCS/regs/voc/coat/en/DiscussDoc.cfm#6>.

⁴⁸ Note that the federal government has also undertaken consultation processes relating to VOCs in the printing and publications industry (<http://www.ec.gc.ca/nopp/voc/en/secP.cfm>), and in cleaning and degreasing operations

(<http://www.ec.gc.ca/nopp/voc/en/secCD.cfm>). However, these consultations do not yet seem to contemplate the introduction of regulations.

⁴⁹ See <http://www.ecoaction.gc.ca/news-nouvelles/pdf/20070426-1-eng.pdf>.

⁵⁰ See http://www.ec.gc.ca/cleanair-airpur/Turning_the_Corner/CEPA_1999_Sec_71-WS074B0A75-0_En.htm.

⁵¹ See list at http://www.chemicalsubstanceschimiques.gc.ca/challenge-defi/list_e.html.

⁵² See <http://www.chemicalsubstanceschimiques.gc.ca/en/index.html>.

⁵³ See http://www.chemicalsubstanceschimiques.gc.ca/challenge-defi/batch-lot_1_e.html#2.

⁵⁴ See http://www.chemicalsubstanceschimiques.gc.ca/challenge-defi/index_e.html.