BUILDING CAPACITY FOR THE CANADIAN ENVIRONMENTAL NETWORK TOXICS CAUCUS:

A proposal

Submitted to the Laidlaw Foundation

Submitted on behalf of the
Canadian Environmental Network Toxics Caucus

October 12, 2000

PURPOSE OF PROPOSAL

The Toxics Caucus of the Canadian Environmental Network (CEN) is submitting this proposal as a follow-up to a meeting between Paul Muldoon, Canadian Environmental Law Association, and Chair of the CEN Toxics Caucus last week. The general objective of this proposal is to seek support from the Laidlaw Foundation to facilitate capacity building among the members of the CEN Toxics Caucus in their activities to promote the elimination of persistent toxic substances from the Canadian environment. The timeframe for completing the proposed activities is one year, beginning January 2001.

WHO IS THE CEN TOXICS CAUCUS?

The Toxics Caucus is one of 12 caucuses or working groups coordinated by the CEN to address current and emerging environmental issues affecting Canada. Other caucuses and working groups of the CEN include international, forestry, climate change, biotechnology, and harmonization of environmental standards to name a few.

The main focus of the Toxics Caucus is to ensure effective legislation and policy reform activities are undertaken on issues that relate to the management of toxic substances. The Toxics Caucus, as with other CEN caucuses, does not take positions on specific issues. Rather the Caucus facilitates and coordinates activities that ensure the view of the Canadian environmental community on relevant matters on the management of toxic substances across Canada are articulated and presented to the federal government. These may include preparing detailed submissions on specific issue areas, coordinating presentations and meetings with decision-makers, and coordinating public events to highlight their concerns. In the past, these activities have provided assistance and enhanced the work of grassroots organizations working on local issues. Environment Canada has often viewed the Toxics Caucus as a conduit for expressing an environmental perspective on its various toxics management initiatives. Since many of these federal initiatives are wide ranging in scope and focus and often require a certain level of legal and technical expertise on specific issues, participation in Caucus activities is encourage through an open door policy to all environmental organizations in Canada. This means that the level of participation by the Caucus depends on the issue to be addressed.

The Toxics Caucus currently includes over 125 organizations from across Canada. The steering committee currently comprises of approximately 13 organizations, including participation from World Wildlife Fund Canada, Canadian Environmental Law Association, Greenpeace, Canadian Labour Congress, Environmental Law Centre, Great Lakes United, Reach for Unbleached, Canadian Institute for Environmental Law and Policy and Societé pour Vaincre la Pollution among others.

The history and past activities of the Toxics Caucus are outlined in Appendix 1. A cursory review of current activities are described below.

CURRENT ACTIVITIES OF THE TOXICS CAUCUS

The Toxics Caucus identifies several initiatives below which are currently underway and will require participation by members of the Toxics Caucus to ensure that the protection of Canadians and their environment. As noted in Appendix 1, the Caucus will continue to monitor and provide input into several ongoing including:

- any proposed amendments for the *National Pollutants Release Inventory* (NPRI),
- the strategies to implement the *Toxic Substances Management Policy* (TSMP) with emphasis on the implementation of the new *Canadian Environmental Protection Act* (CEPA) (see below),
- the future of *Accelerated Reduction/Elimination of Toxics* (ARET), and
- any effort undertaken by Environment Canada to develop consultation papers outlining options to manage those substances reviewed under the Priority Substances List (PSL II).

In addition, the Toxics Caucus is currently focused on the following initiaitives:

Negotiations towards a Global Treaty on Pesistent Organic Pollutants

The impact of persistent organic pollutants (POPs) to human health and the environment is of particular concern for Canada. . POPs, persist in the environment, bioaccumulate up the food chain, have an affinity to cold climates and have the ability to be transported long distances –far from their sources, are man made substances such used in industrial processes, as pesticides or produced as by-products. Many of these POPs are also endocrine disruptors. The northern regions of Canada and the northern communities are especially vulnerable to POPs exposure because the cold climates of the north acts as sinks for POPs.

Canada along with the international community recognized the need to take action on POPs. Under the auspices of the United Nations Environment Programme, international negotiations towards a global treaty on POPs began in 1998. Since the first Intergovernmental Negotiating Committee (INC) session in June 1998, the Toxics Caucus has participated and provided substantive submissions towards these international negotiations. The Toxics Caucus has been a delegate at each of the four INC sessions to date, and a number of member organizations from the Toxics Caucus also participate in the International POPs Elimination Network (IPEN),[1] a network which has integral role in the development of a global treaty on POPs.

The main goal of these negotiations is to develop a global treaty aimed at the elimination of POPs. Currently, there are 12 POPs[2] targetted under the global treaty and a proposed framework to list additional POPs for this treaty. To date, there have been four INC

[1] For more information on the work of IPEN, visit their website at www.ipen.org.

[2] The 12 POPs include: aldrin, chlordane, DDT, dieldrin, endrin, heptachlor, hexachlorobenzene, mirex, toxaphene, PCBs, dioxins and furans.

sessions, with INC5 scheduled for December 2000 in Johannesburg, South Africa. The signing of the agreement is expected to occur in 2001 in Sweden.

The effectiveness of the treaty will focus on resolution of four critical issues. They are:

1) the goal of elimination of POPs versus reduction, in particular with respects to POPs found to be by-products;
2) incorporating the precautionary principle beyond the Preamble section of the treaty;
3) establishing an effective framework for nominating POPs for action; and
4) establishing a mechanism for financial and technical assistance to implement the obligations of the treaty.

Without resolution to these four main issues at INC5, the future of a global treaty on POPs may be threatened. The Toxics Caucus will continue to monitor the progress of these negotiations as well as participate in the development of implementation plans for POPs in Canada.

Implementation of the New CEPA

Because of the long history of the Toxics Caucus in the CEPA review, a logical progression is its involvement in the implementation phase for the new CEPA. Environment Canada has begun to develop its strategy for implementing the new CEPA. In a recent meeting with Environment Canada to discuss the implementation of Part IV and V of CEPA focused on pollution prevention and management of toxics substances, respectively, members of the Toxics Caucus identified several emerging issues and initiatives that will require substantive response by members of the Caucus. At this meeting, it became obvious that participation and input from members of the Caucus in these initiatives is both critical and necessary. But to what extent can a co-ordinated effort be undertaken by the Toxics Caucus was questionable. The Caucus emphasized to Environment Canada that the Caucus is limited in its ability to co-ordinate these efforts because of the lack of resources and would welcome opportunities to seek support in these endeavours from government departments and private sources.

The two process which require immediate responses by the Caucus include the Policy Framework for Environmental Performance Agreement under CEPA (due October 6, 2000) and the Technical Advisory Committee (TAC) for the Domestic Substances List. TAC is responsible for developing a process to categorize and screen 23,0000 substances currently listed under the DSL. TAC has been active for the past two years but has recently announced that the mandate for this committee has been extended for one more year. The Caucus currently has one representative on the TAC, but has recently requested an expansion of the committee to include an additional representative from the environmental community. Despite the technical focus of this committee, the Caucus identifies the need to have an additional ENGO representative on TAC that could address the public policy implications of its work.

As more of these initiatives are expected to be announced in the upcoming months, the Toxics Caucus aims to secure resources that would increase its capacity to co-ordinate activities among the members of the Caucus on these initiatives.

Pesticides Control Product Act

Recently the Toxics Caucus expanded its mandate to address pesticides issues. The issue of registration and re-evaluation of pesticides in Canada is now reaching a crucial phase. The Standing Committee on Environment and Sustainable Development, a parliamentary committee which reviewed the effectiveness of the *Pesticides Control Product Act* (PCPA) and prepared its report on its findings in June 2000, awaits the government response to that report. Many organizations, including World Wildlife Fund Canada, Toronto Environmental Alliance, Sierra Club of Canada, Canadian Labour Congress, and the Canadian Environmental Law Association that have programs focused on pesticides, are expected to take significant roles in reviewing the response from government on this matter. The Toxics Caucus recognizes this time as an opportunity to ensure that the environmental community's views on the sections of the PCPA are articulated and communicated to decision makers. Further, the Toxics Caucus is aware that this legislative review is an opportunity to assist in the work of the Coalition for Pesticide Reduction, a coalition with broad membership (also includes individuals) from across Canada working on cosmetic and agriculture use of pesticides. There is some overlap in memberships of the steering committees of the Toxics Caucus and CPR that will ensure that information exchange is facilitated in a timely manner. Coordinating activities of the Caucus and the Coalition, especially on PCPA, will require a level of coordination among member organizations.

On other matters related to pesticides, various members of the Toxics Caucus have expressed a keen interest in the decision from the Town of Hudson case that is now before the Supreme Court of Canada. The response by member organizations of the Toxics Caucus to the court decision will be a focus of the Toxics Caucus.

OBJECTIVE OF THIS PROPOSAL

This proposal aims to provide support to the Toxics Caucus in their many activities. Given the scope of issues before the Toxics Caucus and an increase in demand for technical expertise on various federal initiatives, it has become more obvious the need for the Toxics Caucus to focus on capacity building within the environmental community to ensure that current and emerging issues relating to management of toxic substances are addressed effectively. A key to capacity building is have effective co-ordination of Caucus activities.

Under this objective, activities of the Caucus will continue to focus on engaging member organizations on initiatives aimed at eliminating toxic substances. This is keeping with programme goals of the Laidlaw Foundation.

DELIVERABLES AND PRODUCTS

The Toxics Caucus has identified a number of products that will be undertaken in this proposal. They include:

1) A CEN Toxics Caucus Website – The Toxics Caucus identified a need to design a website for Toxics Caucus activities. This website would serve several purposes, including:

- Provide the public access to information on various Caucus matters;
- Form an identify for the Toxics Caucus;
- Establish appropriate links to websites of member organizations;
- Provide cost savings tool for grassroots organizations and other public interest organizations that wish to access legal and technical information; and
- Provide a venue to coordinate public campaigns electronically.

2) Research

There are many initiatives including the TAC of the DSL, screening CEPA toxic substances, recommending options for CEPA toxic substances, identifying additional POPs for global action, or risk assessment issues related to the review of PCPA, that may include a technical component. The Toxics Caucus would like the opportunity to provide input into these processes and would utilize the some of the resources requested from Laidlaw Foundation to ensure their completion. In many current situations, the Toxics Caucus depends on volunteers to undertake this task or pass on the opportunity to provide comments. In our view, this limits the Caucus' ability to advocate effectively for public policy reform. Any technical reports undertaken by the Caucus will be completed under the supervision of steering committee of the Toxics Caucus.

3) Co-ordination

The effectiveness of the Toxics Caucus in advocating for legislative and policy reform depends on the level of coordination available to the member organizations. It is crucial to the work of the Caucus that communication activities are maintained, especially on initiatives that require a timely responses. The role of the Co-ordinator during the CEPA review was critical as it provided a central point of information exchange and dissemination. A similar level of coordination is required for present Caucus' activities. The Co-ordinator will have a significant role in ensuring that there is representation from the Caucus members on relevant matters and information is distributed among member organization on a timely basis. Furthermore, the Co-ordinator will ensure that outreach activities such as the design of website is completed.

PROPOSED BUDGET

Coordination (24 days @ $250.00/day)	$6,000.00*
Research	$4,000.00
Website for Toxics Caucus	$2,000.00
Translation	$1,500.00
Office Expenses	
(long distance/fax, photocopy, postage/courier, conference calls)	$1,500.00
CEN Administration (15%)	$2,250.00
Total Amount Requested	$17,250.00

* This figure is based on co-ordinating CEN activities for approximately 0.5 day/week for one year between January 2001-January 2001.

The proposed budget would make a significant impact on the capacity of the Toxics Caucus to communicate and co-ordinate activities on the wide range of initiatives identified above. In the past few years, the main financial support received by the Caucus came from Environment Canada in the form of small contracts for preparing ENGO position on the international negotiations for a global treaty on POPs, for research on specific issues and co-ordination of a few Caucus meetings. To ensure some level of co-ordination, the Caucus has had to rely on donation of resources by member organizations.

Currently, the role of Co-ordinator for the Toxics Caucus is undertaken on a part-time basis by CELA with assistance from the National Caucus Coordinator of the CEN to ensure regular communication with member organizations is maintained. At this time, we are proposing that the project be administered through the Resource Library for the Law and the Environment.

APPENDIX 1 – History and Past Activities of the CEN Toxics Caucus

HISTORY

The Toxics Caucus was established, initially, as a working group to respond and coordinate activities around the five-year review of the *Canadian Environmental Protection Act*, in 1994. However, shortly after the working group was established, the Toxics Caucus recognized the importance of ensuring that the environmental community perspectives on other related federal initiatives on the management of toxic substances are also articulated. For example, the Caucus has effective participated in consultations on the *National Pollutants Release Inventory*, the *Towards Pollution Prevention: A Federal Strategy for Action*, the *Strategic Options Process*, the Domestic Substances List, Priority Substances List and the Canada-wide Standard Setting Process under the Canadian Council of Ministers of the Environment. Since June 2000, the focus of the Toxics Caucus was expanded further, this time to address matters relating to pesticide and hazardous waste.

PAST ACTIVITIES OF THE TOXICS CAUCUS

As noted in a previous section of this proposal, the Toxics Caucus has been most active on the CEPA review but has listed down below selected initiatives that it has monitored and participated in over the past six years. The list below provides a brief description of those initiatives that included Caucus participation as well as the nature of this participation.

Review of the *Canadian Environmental Protection Act*

Between 1994-1999, the Toxics Caucus participated in the federal review of the CEPA, Canada's main legislation to protect the Canadian population and its environment from exposure to toxic substances. The level of participation by the Toxics Caucus was extensive, it included member organizations preparing detailed submissions at every stage of the review process and communicating there findings to federal decision makers. The Caucus began the review process with the preparation of comprehensive reports in September 1994 that provided analysis on areas of weakness within the existing Act. The issues covered included:

- Guiding Principles including: the elimination of toxic substances, precautionary principle, and strong federal leadership
- Enforcement and Administration
- Citizens' Right to Know
- Legislating the National Pollutants Release Inventory
- Ocean Dumping
- Coastal Zone Management
- Air Pollution

- Biotechnology
- Biodiversity and Ecosystem Approach
- Emergency Planning
- Putting the Federal House in Order
- Transboundary Movement of Wastes

A summary of the issues and recommendations addressing the weaknesses in CEPA were presented in a report, The *Canadian Environmental Protection Act*: An Agenda for Reform,[3] and presented to a parliamentary committee responsible for reviewing CEPA. This summary report was endorsed by over 50 environmental, labour and health organizations from across Canada. This parliamentary committee prepared its report in June 1995. The Government of Canada responded to the committee report in December 1995, and introduced Bill C-74, a new CEPA in Parliament for First Reading in December 1996, but it was never passed. It died on the order papers when a federal election was announced for June 1996. A new CEPA bill, Bill C-32, was re-introduced into Parliament for First Reading in March 1998 and was passed in September 1999.

Throughout the review process concerns on the above issues formed the foundation for participation by the members of the Toxics Caucus, however there were several significant issues that elicited controversial discussions from various stakeholders including the Toxics Caucus. To ensure that CEPA would protect human health and environment, the Toxics Caucus continued to raise its concerns on the following issues throughout the CEPA discussion.

- the need to eliminate persistent toxic substances through bans and phase out regimes;
- the need to define 'virtual elimination,' and 'inherent toxicity' for CEPA toxic substances to ensure the principles of pollution prevention were upheld;
- incorporating the precautionary principle;
- ensuring CEPA does not become a residual statute because of the *Canada-wide Environmental Harmonization Accord*;
- incorporating a citizens' right to know section;
- improving the screening process for biotechnology activities as well as new substances;
- ensuring whistle blower protection for workers;
- improving the reporting requirements to the National Pollutants Release Inventory.

A selected list of reports prepared on behalf of the Toxics Caucus throughout the CEPA is available upon request.

In addition to the comprehensive analysis and recommendations submitted by members of the Toxics Caucus to improve CEPA, the Toxics Caucus undertook several public outreach activities focused on CEPA which are highlighted in the following subsection.

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[3] See: The *Canadian Environmental Protection Act: An Agenda for Reform*. September 1994.

See submissions prepared by members of the Toxics Caucus throughout the CEPA review.

Outreach Activities

To emphasize the need for strong legislation on toxic substances in Canada, the Caucus coordinated a number of outreach activities at various stages of the CEPA review. Outreach activities undertaken by the Toxics Caucus included:

- designing a website focused on CEPA;
- coordinating several postcard and letter writing campaigns (also made available on the website) to the Prime Minister and selected federal Ministers to ensure effective legislation on toxic substances;
- producing a report card that analyzed and graded the performance of the Liberal Party on matters concerning the management of toxic substances in Canada; and
- co-ordinating two events under the A Taste of Canada project.

The presence of the CEPA website presenting the views of members of the Toxics Caucus was unique. The CEPA website provided the first undertaking by the environmental community to coordinate a public campaign, electronically. The design of this website was made possible through financial support received from Laidlaw Foundation.

Under the Taste of Canada project, the Toxics Caucus completed two reports:

1) in 1997, a report highlighting the extent of toxic contamination in the Canadian diet;[4] and
2) in 1998, a case study highlighting the results of toxic contamination in selected foods taken from the Parliamentary cafeteria in Ottawa.[5]

A public event for the release of each of above reports was coordinated, with each event attracting a wide range of media. Similar to undertaking the design of the CEPA website, A Taste of Canada was a unique effort to highlight the weaknesses of CEPA in a format that the general public may better understand the complexities of the Act.

National Pollutants Release Inventory

The *National Pollutants Release Inventory* was established in 1993 with participation by several ENGOs in the NRPI working groups. Despite the announcement on NPRI, this working group identified a number of substantial issues around the NPRI program that remained unresolved. The issues included: a process to expand the list of substances to be reported on, requirement of mandatory pollution prevention plans, reviewing thresholds for reporting, the capacity of NPRI program to make comparisons between the data collected through NPRI and the US' Toxics Release Inventory, and need to legislate NPRI reporting . A multi-stakerholder process was established to address some of these issues. As well, many of the concerns around the NPRI program were also expressed throughout the CEPA review. Progress on some issues has been made. The multi-

[4] See: Burkhard Mausberg and Paul Muldoon. 1997. A Taste of Canada: an expose of toxic chemicals in your meals and bioengineered food made in Canada.

[5] See: Canadian Environmental Law Association. 1998. A Taste of Canada: A Case Study.

stakeholder process continues to address issues relating to the effectiveness of the NPRI with effective participation by several members of the Toxics Caucus.

Pollution Prevention: A Federal Strategy for Action

In April 1995, the federal government released for reveiw, its position on pollution prevention and the role it will have in federal initiatives focused on management of toxic substances. Overall, the Caucus supported the concept of pollution prevention as presented by Environment Canada because it focused on eliminating the "causes of pollution...reflecting a major shift in emphasis from 'control' to 'prevent'."[6] As highlighted in its submissions,[7] however, members of the Toxics Caucus raised a number of concerns around this strategy. The main concern expressed by the Caucus focused on the Environmental Protection Hierarchy presented by the Government of Canada and the role of pollution prevention in this hierarchy. The Toxics Caucus indicated that recycling is not a true pollution prevention tool and that recycling activities entrenches use of use of control technologies because it does not encourage source reduction of toxic substances. Further, recycling activities increase the potential risk of exposure to various populations (i.e., workers, communities, etc.) from toxic emissions especially when waste material is transported off site for recycling and/or when close loop recycling systems are utilized. If recycling is considered a pollution prevention tool under this strategy, then only close-loop processes that provides added protection to workers, human health and environment may be considered under this strategy.

The commitment by the Government of Canada to pollution prevention is reflected in the new CEPA, however, many government departments and agencies have not released their strategy on how to implement pollution prevention. The Toxics Caucus is committed to monitoring the efforts made by government departments on implementing pollution prevention.

Development of the *Toxic Substances Management Policy*

In 1995, the Toxics Caucus participated in the consultation to develop the *Toxic Substances Management Policy*, a federal policy with a goal to "virtually eliminate" persistent toxic substances through a two-track approach. Those toxic substances identified under Track 1 meet the criteria for persistence, bioaccumulation, CEPA toxic, and are mainly anthropogenic. Track 1 substances are targetted for "virtual elimination." Those substances which do not meet all criteria for virtual elimination will fall under Track 2 and are targetted for release reduction.

Members of the Toxics Caucus provided substantive analysis of this policy to Environment Canada, particularly with respects to the CEPA review. The Toxics Caucus documented the failure of the TSMP to embrace the principles of pollution prevention throughout the policy. First, Track 1 substances under the TSMP, while targetted for

[6] Government of Canada. 1995. Pollution Prevention: A federal strategy for action.

[7] See: Canadian Environmental Law Association et. al. 1995. Response to Pollution Prevention: Towards a Federal Strategy for Action. Submitted to Environment Canada.

virtual elimination is defined as "no measureable release," a definition which does not support a pollution prevention approach, but rather a pollution control approach. There should be a commitment for phase outs of those substances identified under Track 1. Second, other key guiding principles such as the precautionary principle and protection for workers are not clearly articulated in the TSMP. Third, the high thresholds proposed to identify Track 1 substances do not ensure that human health and environment are adequately protected. There are a number of substances, such as endocrine disruptors, that are toxic but do not meet the Track 1 criteria that should also be targetted for 'virtual elimination.' Fourth, the TSMP does not provide adequate guidance on how Track 2 substances will be addressed. Finally, the determination of "no measureable release" is based on the use of "Limit of Quantification" a level of measurement used in a risk assessment regime.[8]

The announcement of the TSMP in 1995 has had profound implications on the CEPA review, as the process to determine CEPA toxic was amended to ensure consistency with the TSMP. The Toxics Caucus will continue to monitor activities of government departments towards the implementation of the TSMP. In particular, the implementation of Parts IV and V in the new CEPA addressing pollution prevention and the management of toxic substances will provide a key focus of Caucus activity.

Evaluation of Accelerated Reduction/Elimination of Toxics

The *Accelerated Reduction/Elimination of Toxics* (ARET),[9] a voluntary program established between eight industry sectors and the federal government to report on emissions releases of 117 substances, including 30 persistent toxic substances, was announced in 1994. Several members of the Toxics Caucus were active at the initial stages of the development of ARET, but withdrew its participation in September 1993 due to contentious issues. The goal of ARET was to have 90% reduction emissions of the 30 persistent substances listed under List A-1, and 50% reduction emission of the remaining substances by the year 2000. In anticipation for the end of ARET, which was scheduled to end at the end of the year 2000, the federal government initiated an evaluation of the program to determine the effectiveness of the program in meeting its goals of elimination and reduction of emissions of key substances. The evaluation process, which was conducted through a multi-stakeholder review process, would assist

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[8] See: Burkhard Mauberg, Paul Muldoon, and Mark Winfield. 1994. A Response to the Proposed Toxic Substances Management Policy for Canada. Submitted to Environment Canada.

Also: Canadian Environmental Law Association, Canadian Institute for Environmental Law and Policy, Canadian Labour Congress, Great Lakes United, and Toronto Environmental Alliance. 1997. The Toxic Substances Management Policy-Environment Canada Implementation Strategy for Existing Substances – Final Draft.

[9] For more information on ARET visit the Environment Canada Green Lane at www.ec.gc.ca.

Note: Members of the Toxics Caucus participated in the initial stages of developing ARET. However, due to various contentious issues on the elimination goals of the program and accountability issues, the Toxics Caucus formally withdrew its participation in September 1993.

in determining the future of ARET. The Toxics Caucus participated in the evaluation process.

The evaluation process revealed key observations on the effectiveness of ARET, including:

- ARET participation was not the main factors in motivating industry to reduce releases of toxic substances...However, it helped industry to focus its efforts in reducing the emissions of toxic substances;
- A1 substances target will likely not be met by the year 2000;
- Between 1993 and 1996, ARET participants have reported in the National Pollutants Release Inventory (NPRI) a 58% reduction of overall emissions whereas non-participants have increased their emissions by 1%;
- Participants do not report all their releases of ARET substances...;
- ARET could have had stronger linkages with other toxic substances management programs at the federal, provincial, and regional levels;
- Environment Canada does not have in place an integrated information system to identify the best opportunities for using voluntary measures or participating in initiatives such as ARET.[10]

The Toxics Caucus will monitor the follow-up activities of Environment Canada around ARET. The findings of this evaluation emphasized the need for the Caucus to continually monitor the development and goals of voluntary agreements focused on toxics substances. Environment Canada recently released the Policy Framework for Environmental Performance Agreement[11] for public comments.

Strategic Options Process under CEPA

Under CEPA 1988, 44 substances were targetted for assessment of toxicity under the Priority Substances List of CEPA. The assessment of these 44 substances were completed in 1994. The results of these assessments indicated that 25 of the 44 substances were found to be CEPA toxic. The management of these CEPA toxic substances would be determined based on the options developed under the Strategic Options Process (SOP), a multi-stakeholder process that established issue tables based on specific CEPA toxic substances or sector use of CEPA toxic substances. A total of 11 issue tables were established.[12] The mandate of each issue table was to prepared reports that proposed management options for addressing these CEPA toxic substances. The management tools proposed could comprise of a mixture of regulatory and non-regulatory tools.

Since 1995, the Toxics Caucus, through a coordinator from Great Lakes United, participated and provided substantive input at each of the issue tables developed under

[10] Environment Canada. 2000. Evaluation of the Accelerated Reduction and Elimination of Toxics Initiative (ARET): Final Report.
[11] For a copy of the policy framework visit Environment Canada's Green Lane at www.ec.gc.ca.
[12] Visit Environment Canada's Green Lane for a history on SOP at www.ec.gc.ca.

the SOP process. With exclusion of the issue table on wood preservatives and steel smelters sector, all the issue tables have been completed. The participation of the Toxics Caucus at these consultations has been critical, as these consultations have proven to be the only avenue to provide input into management options to address CEPA toxic substances. More importantly, the experience gained from the SOP will prove invaluable for the environmental community as Environment Canada is set to complete the assessment for toxicity of 25 substances identified under Priority Substances List II (PSL II). The assessment of PSL II substances began in 1995.