



THE CANADIAN CHEMICAL PRODUCERS' ASSOCIATION

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THE CANADIAN CHEMICAL PRODUCERS' ASSOCIATION'S VIEWS ON DEFINITION OF HAZARDOUS WASTES

We submit the following definition for consideration by the Task Force:

"Waste is a residual that has no commercial value to the generator or user. Such a residual could result from any undertaking."

In defining "hazardous" we believe that the task force should be primarily concerned with human health and environmental effects since such properties as flammability are primarily related to safety and will be adequately dealt with in sections 1 to 8 of the Dangerous Goods Code. In our view, a waste to be hazardous must have the potential of presenting a risk or producing damage to somebody or something. This risk will be a function of the properties of the active ingredients of the waste which includes its concentration and the degree of exposure experienced.

W.A. Neff

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WAN:lds

encl:

cc: Task Force Members (list attached)