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August 24, 2011

The Honourable Peter Kent
Minister of the Environment
Les Terrasses de la Chaudière
10 Wellington Street, 28th Floor
Gatineau, Quebec K1A 0H3

Dear Minister Kent:

**Re: Implementation of Polybrominated Diphenyl Ethers (PBDE)
Revised Risk Management Strategy**

We write to you on behalf of the David Suzuki Foundation, Canadian Environmental Law Association and Environmental Defence regarding the regulation of the toxic chemicals polybrominated diphenyl ethers (PBDEs).

Last September we wrote to then Minister of the Environment Jim Prentice that we were very pleased that the August 2010 revised risk management strategy for PBDE flame retardants under the *Canadian Environmental Protection Act* (CEPA) includes a comprehensive ban on all PBDEs, including PBDEs in products.

The revised risk management strategy committed the government to information gathering and consultations on the additional proposed regulatory controls in 2010-2011 in preparation for the publication of the proposed regulation controls in 2012 for finalization under CEPA in 2012.

Since the release of the revised risk management strategy there have been no further consultations on this issue to our knowledge. We are concerned that the government may be falling behind on the timeline it published in the revised risk management strategy.

If the government delays action, it risks Canada becoming a dumping ground for PBDE-laden products that other countries have already banned.

We ask that the government accelerate work to implement the revised risk management strategy and move quickly to put in place the comprehensive

ban on all PBDEs, including DecaBDE, to reduce Canadians exposure to these toxic chemicals and prevent further accumulation of PBDEs in the Canadian environment.

We look forward to future discussions with the government on the proposed regulatory controls.

Yours truly,

A handwritten signature in black ink, appearing to read "Hugh Wilkins", followed by a horizontal line and three dots.

Hugh Wilkins
Staff Lawyer
Ecojustice Canada