#FUTUREOFFORESTRY

Opportunities for Regulatory Improvements with EPA's SNUR and EC/HC's SNAc Programs

Bob Larocque
Senior Director, Environment and Labour Market Policies

FPAC.ca
APFC.ca

Purpose

- Background information
- Forest sector challenges
- Solutions/Best Practices
- Successes
- Going Forward

Background information

- Forest products sector is comprised of ~175 medium/large wood products facilities and ~90 pulp and paper facilities who **import, manufacture and/ or use substances covered by the Chemical Management Plan (CMP)**
- Forest Products Association of Canada (FPAC) has partnered with a scientific organization called National Council of Air and Stream Improvement (NCASI) to help the sector meet the CMP requirements
- FPAC/NCASI have a substantive database on the sector ranging from facility location, production, types of process, energy input and use, substance uses, air and water pollutants and types of control equipment
- Sector has develop a detail handbook (used by over 85% of the facilities) to evaluate by-product manufacture and releases of hundreds of substances

Forest Sector Challenges

Substance(s) X

TIME CONSUMING TO TRACK AND RESPOND FOR OVER 250 SUBSTANCES

Data Gathering (e.g. s.71)

- Duplication from each facility
- Errors in data submitted
- Minimal outreach to foreign supplier
- MSDS not enough to understand if sector was a user

Risk Assessment

- Wrong assumption for releases and exposure
- Foreign supplier info to EC/HC not shared with users

Risk Management

- RM tool covering wider stakeholders than necessary
- Extra compliance burden (reporting, testing, monitoring)
- RM tool developed covering users (SNAc, others) while users has no information

Case Study : MAPBAP Acetate

- Sector was identified has a user by foreign and domestic suppliers but s.71 data sent as confidential
  - EC/HC could not share data with users

- RA was developed using s.71 data and exposure was based on sector process assumptions without consulting with users (only with suppliers)
  - Substance retention rate under estimated
  - Primary and secondary treatment reduction under estimated

Case Study : MAPBAP Acetate (cont'd)

- RM tools develop:

  1) Release guideline that applies to the users (pulp and paper) with mentioned of suppliers ("using currently available knowledge, methods and technologies from the supplier")

  2) SNAc was published in January 2014 which covers any activity over a 100 kg of MAPBAP acetate but it does exclude a dye in wood, pulp or paper products

- Challenge:
  - any suppliers at any time can add MAPBAP acetate (SNAc exclusion) to their dyes
  - Suppliers have no RM tool responsibility to inform the users
  - But the users are covered by a CEPA Guideline

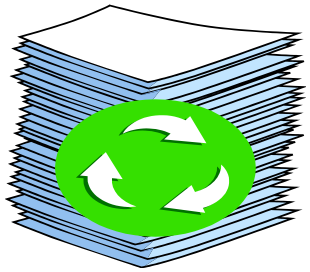
Supply Chain Challenges

- Time consuming to track and report on ~ 250 substances
- Information sharing between suppliers and industry
- Confidential Business Information
- Roles and Responsibilities of all stakeholders regarding information sharing between suppliers and users

Solutions/Best Practices

- Develop and implemented a forest sector working group with EC/HC

- Develop an internal sector process to data gathering



- Take full advantage of s.71/ RA/RM flexible requirements/options

Solutions/Best Practices:

Joint EC/HC/Forest Sector working group

- Track all substances related to our sector (currently 203)
  - from data gathering to completed RM
- EC/HC informs suppliers of sector willingness to work together on responding to EC questions
- Share information based on aggregate or ranges
- Open discussion about roles of suppliers and users as it relates to substance use, management and releases

Solutions/Best Practices:
Develop an internal process to data gathering

- FPAC/NCASI are responsible for collecting all the data relating to each substances covered by CMP
  - Saved significant reporting time to industry
  - Better, more accurate data sent to EC/HC
  - Share aggregate information from EC/HC to companies to facilitate conversations with suppliers
  - Allows FPAC/NCASI to contact suppliers and offer to work together on behalf of individual companies

Solutions/Best Practices:
Take advantage of s.71/RA/RM flexible requirements

- Inclusion of blind submission information (DSL IU) provided enough information to flag a substance as of concern
- Working together with suppliers to review EC/HC assumptions regarding RA
- Intent to work in partnership regarding the next RM tool to be developed

Solutions/Best Practices Successes

Substance(s) X

Saved ~600 k/yr of personnel time (assuming 3-4 data request/yr)

Data Gathering (e.g. s.71)

- Eliminated duplication
- Info to EC/HC
  - Accurate and more detailed
- Better relations with foreign suppliers
- Streamlined follow-up request

Risk Assessment

- identifying issues/ data gaps early
- More accurate RA
- Better info sharing from EC/HC on data gathering results (ie CBI)

Risk Management

- Developing flexible and targeted RM instruments
- Saving time and $ for unnecessary testing, reporting and monitoring

Going Forward

- Build on our success moving forward on s.71/RA/RM
- Understand the impact of GHS
  - Is more information going to be provided to users?
- Continue to work with suppliers
  - Still a fear that certain suppliers are not informing users
  - Try and address CBI with partnership rather than rely on EC/HC
- Work with EC/HC and suppliers regarding roles and responsibilities on future RM tool
- Alignment of requirements/approaches between Canada/US

Thank You

- Bob Larocque
  - rlarocque@fpac.ca
  - 613-563-1441 ext 346