

January 19, 2019

Michael Friesen  
Toxics Reduction Program  
Ministry of the Environment, Conservation and Parks  
40 St. Clair Avenue West  
4th floor  
Toronto ON M4V 1M2

Re: ERO 013-4234 Repeal the Toxics Reduction Act, 2009 and all associated regulations by December 31, 2021

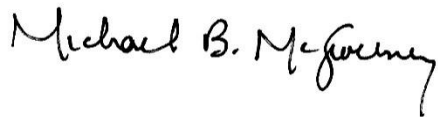
The Cement Association of Canada (CAC) is pleased to offer comments on the Repeal the Toxics Reduction Act, 2009 and all associated regulations by December 31, 2021.

The CAC supports the Ministry's proposal to repeal the Act and all associated regulations by December 31, 2021. We would also be open to an earlier timeline. As outlined in our recent submission to the Deputy Minister of Regulatory Reform and Burden Reduction, the Toxics Reduction Act has had a heavy administrative and cost burden which duplicates federal programs with little to no added environmental benefit. Substances are currently assessed and managed through the Canadian Environmental Protection Act (CEPA), the associated Chemical Management Plan (CMP) and Environment Management Systems (EMS), such as ISO14001 and Responsible Care. As was noted in the recent posting, preliminary results of the Toxics Reduction program indicate that it has not achieved meaningful results with a mere 0.04% reduction in production, use and release of listed substances from provincial regulated facilities.

The federal Chemicals Management Plan is a science-based program that currently requires facilities to take action on toxic substances. By 2021 all substances regulated by Ontario will be covered by the federal program. We applaud the government's decision to no longer require facilities to create or review toxics reduction plans while the federal government finalizes its approach to these substances. This will remove unnecessary duplication and is consistent with the approach taken by other provinces.

The Premier and Minister promote the need for an Ontario environment plan that ensures that all Ontarians have clean air and clean water while removing duplication and ensuring business competitiveness. The cement industry looks forward to working with the Ontario government in support of these goals.

Sincerely,



Michael McSweeney  
President & CEO

The Cement Association of Canada (CAC) is the voice of Canada's cement industry. Five of our companies have operated in Ontario for many decades: CRH Canada Group Inc. (Dufferin Construction); Lafarge Canada Inc.; Lehigh Hanson Canada; St Marys Cement; and Federal White Cement Inc.

Cement, concrete and aggregates facilities are in every community across Ontario, large and small. Our industry generates over 54,000 direct and indirect jobs in Ontario, and our direct, indirect and induced economic contribution is over \$25 Billion.

We are the world's most important building material. Virtually all construction projects – above and below ground – need concrete. Twice as much concrete is used than all other materials combined and is the second highest consumed commodity in the world, second only to water.

Ontario's cement producers are important participants in the national and global marketplace and provide a strategic and reliable supply of the cement required to build Ontario's provincial and municipal transportation infrastructure, buildings and homes, waterworks and dams, and of course our hospitals and schools.