

AOSDAC 2017 Taipei

The Canadian Landscape Industry Working to Ensure Good Public Policy

Shannon Coombs

President

Canadian Consumer Specialty Products Association

October 19, 2017



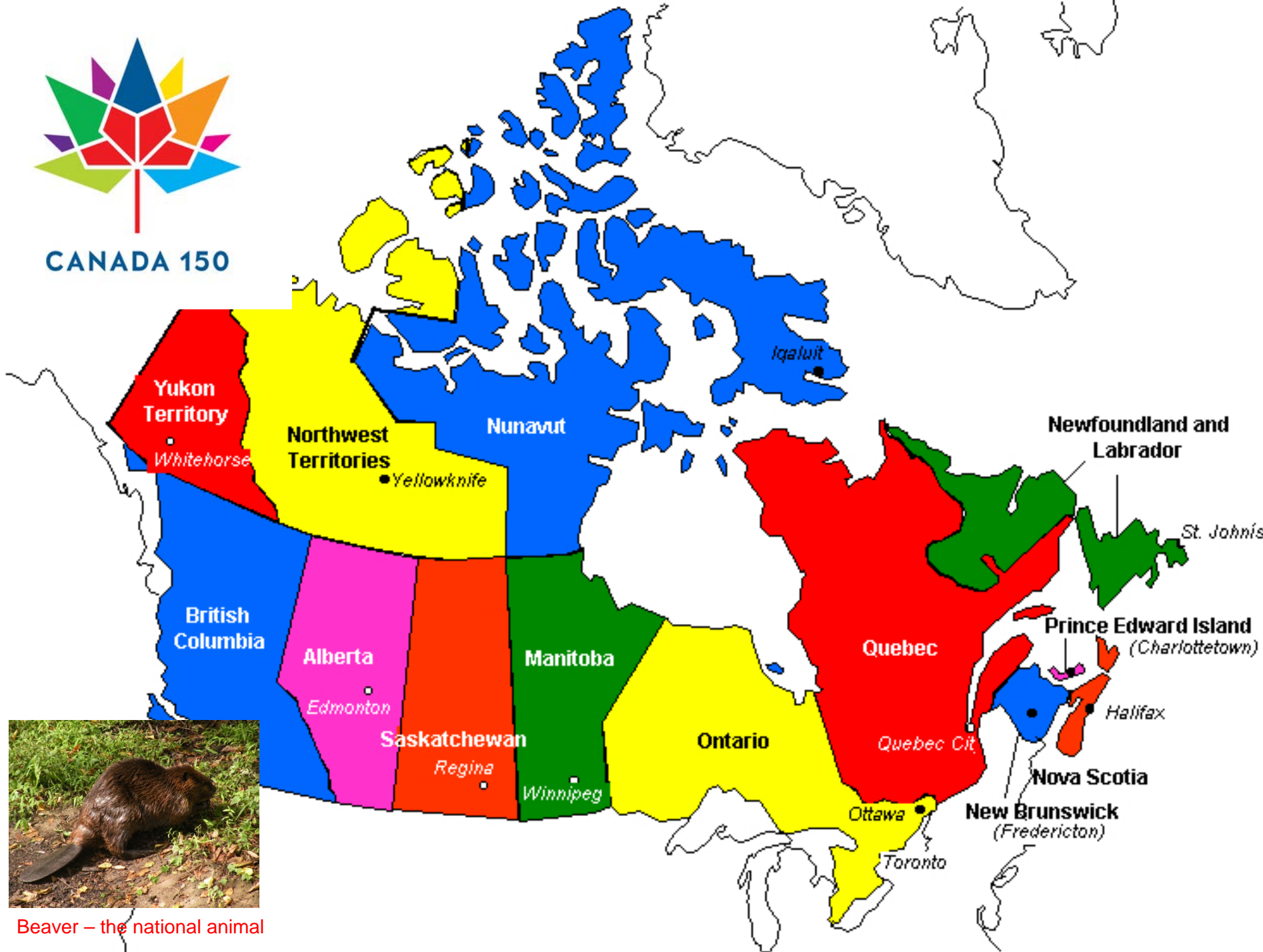
Canadian Consumer Specialty Products Association ~ 1958

- Located in Ottawa – the Capital of Canada
- 35 members
- Staff of 4
- \$20 billion dollar industry
- Exports of \$200M
- Representing companies that manufacture, process, package and distribute consumer, industrial and institutional specialty products, such as soaps and detergents, pest control products, aerosols, hard surface disinfectants, deodorizers and automotive chemicals
- Largest trading partner – the United States





CANADA 150



Beaver – the national animal



British Columbia – Rocky Mountains



Prince Edward Island



Toronto



Prairies – Breadbasket of the World



Niagara Falls

The face of Ottawa



Prime Minister Justin Trudeau



Parliament Buildings



Rideau Canal



CANADIAN CONSUMER SPECIALTY PRODUCTS ASSOCIATION®

L'ASSOCIATION CANADIENNE DE PRODUITS DE CONSOMMATION SPECIALISÉS®

CCSPA ~ Recognized and Respected...*the brand for our industry in Canada*

CCSPA 3-Prong Approach:

- Government Relations
- Public Affairs
- Technical Expertise



CCSPA Board of Directors and Pamela Goldsmith Jones, Parliamentary Secretary for International Trade



Honourable Catherine McKenna – Minister of Environment and Climate Change, Gulnara Gabidullina – Vice Chair of CCSPA, Shannon Coombs, President CCSPA



CANADIAN CONSUMER SPECIALTY PRODUCTS ASSOCIATION®

L'ASSOCIATION CANADIENNE DE PRODUITS DE CONSOMMATION SPECIALISÉS®

Our Industry in 2017

- Consultation on countless pieces of legislation, regulation, policies and guidelines
- Low-risk Regulatory Framework to modernize the *Food & Drugs Act* – (disinfectants)
- Chemicals Management Plan – Phase 3. Over 500 of our business-critical substances are under review by Government
- Globally Harmonized System for the Classification & Labelling of Chemicals (GHS) – delayed implementation/resolving confidential business information (CBI) issues
- User Fees for pest control products and disinfectants on industry submissions for review
- Provincial Post-consumer Waste Issues for packaging and household/special waste (10 systems across Canada)

Challenges

- Regulatory oversight being challenged by ENGOs and other Government officials (Office of the Auditor General)
- Regulatory oversight by Government is often “reregulation”
- Mandatory ingredient and/or “toxic” labelling from ENGOs (Parliamentary Review of *Canadian Environmental Protection Act*)
- Maintaining science as the foundation for decisions
- Keeping the cost/benefit part of regulation development
- Economic pressures – decreasing Canadian dollar, deficit budgets, trade re-negotiation

Challenges

- Regulatory oversight being challenged by ENGOs and other Government officials (Office of the Auditor General)
- Regulatory oversight by Government is often “reregulation”
- Mandatory ingredient and/or “toxic” labelling from ENGOs (Parliamentary Review of *Canadian Environmental Protection Act*)
- Maintaining science as the foundation for decisions
- Keeping the cost/benefit part of regulation development
- Economic pressures – decreasing Canadian dollar, deficit budgets, trade re-negotiation

Chemicals Management Plan – Phase 3

- Canada leads the world in assessing and reviewing substances through the Chemicals Management Plan (CMP). Ahead of the US and the EU on our risk assessments and risk management.
- CMP1 – Industry Challenge program
- CMP 2 – Groupings program – still under way (boron, phthalates)
- CMP3 started March 2016:
 - 1,560 substances to “review” and “assess” by 2020
 - ~500 are in cleaning products – ~150 to be assessed in first 2 years
- Goal is to be proactive and help find exposure data if Government needs it to ensure that the draft risk assessments are based on the best science available.

GHS – Implementation & CBI

- A Regulatory Cooperation Council commitment in 2011, Canada was to implement GHS for the workplace – June 2017.
- Goal of the RCC was to harmonize with the United States. In 2015, we had 75 areas to align on classification and labels. We currently have 9 outstanding.
- Industry wanted one label and one safety data sheet to facilitate trade.
- Delayed by one year for manufacturers but the final implementation date of 2018 for all manufacturers, distributors and employers will be met.
- Delay was due to the unique requirements for CBI to be reviewed by Government. Regulatory amendment is required and will be published for fall 2017.

Environmental Labelling – Competition Bureau Guidelines

- Innovation, Science and Economic Development includes the Canadian Competition Bureau within their mandate and has oversight for the [Consumer Packaging and Labelling Act](#).
- *It requires that prepackaged consumer products bear accurate and meaningful labelling information to help consumers make informed purchasing decisions. The Act prohibits the making of false or misleading representations and sets out specifications for mandatory label information such as the product's name, net quantity and dealer.*
- Environmental Claims: A Guide for Industry and Advertisers – http://www.competitionbureau.gc.ca/eic/site/cb-bc.nsf/eng/02701.html#s1_4
- Document was updated in 2008 and is de facto regulation.

Claims of “...free”

- An environmental claim of "... free" shall only be made when the level of the specified substance is no more than that which would be found as an acknowledged trace contaminant or background level.
- **Example:**
 - **Preferred**
"Lead free" for claims for solder in electronics. (Lead was often used in electronics products, and many manufacturers no longer use lead in their electronics products.)
 - **Discouraged**
"Pesticides free" for claims on organic products where pesticides were never used in the first place in that product category.
- Example : A product is labelled "Free of HCFCs". This claim implies that the product contains no HCFCs (hydrochlorofluorocarbons) and is safe for the entire atmosphere (HCFCs cause harm to the ozone layer). This claim could be considered deceptive if it did not reveal that the product, instead, contained volatile organic compounds (VOCs); as these contribute to the formation of ground-level ozone or smog and, therefore, are not safe for the atmosphere. The potential deception is rooted in the non-disclosure of information, and this claim could be material to the consumer if it influenced a purchasing decision. This example would also not meet the requirements outlined in Clause 5.12 of this Guide.

Regulatory Cooperation Council - Canada & US

- Established in 2011
- Two Reports – Joint Action Plan & Joint Forward Plan
- Key Issues for our industry:
 - Chemicals
 - GHS
 - Transportation Issues
- In 2017 - RCC is expanding scope to other trade agreements (CETA) and waiting for US to signal intent to support RCC.
- Canada views the NAFTA negotiations as a potential opportunity to harmonize regulations.

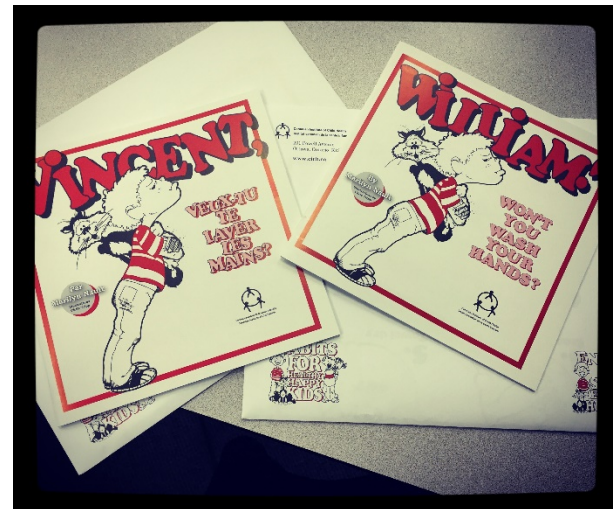


CANADIAN CONSUMER SPECIALTY PRODUCTS ASSOCIATION®

L'ASSOCIATION CANADIENNE DE PRODUITS DE CONSOMMATION SPECIALISÉS®

CCSPA – Proactive Industry

- 2006 – www.healthycleaning101.org website to promote regulation of ingredients and products
- 2008 - Voluntary [Reduction of Phosphorus](#) in Household Automatic Dishwasher Detergent
- 2008 – [Consumer Ingredient Communication Initiative](#)
- 2010 - [Sustainability Webpage](#) for members to profile their work
- 2009 & 2016 [William Won't You Wash Your Hands](#) – teaching children to wash their hands
- 2016 – Initiated social media campaigns on Twitter – tick prevention #LymeAware, handwashing #washyourhands & #lavetesmains, read the label #ritalabel @CCSPA_ACPSC



多謝



CANADIAN CONSUMER SPECIALTY PRODUCTS ASSOCIATION®

L'ASSOCIATION CANADIENNE DE PRODUITS DE CONSOMMATION SPECIALISÉS®