

Avis au Conseil n° 22-02

Consultation publique sur le nouveau projet de la CCE visant à promouvoir la transparence de la chaîne d’approvisionnement en Amérique du Nord

Le Comité consultatif public mixte (CCPM) de la Commission de coopération environnementale (CCE) d’Amérique du Nord,

CONFORMÉMENT au paragraphe 6(4) de l’*Accord de coopération environnementale* (ACE), qui stipule que le CCPM « peut fournir des avis au Conseil [de la CCE] sur les questions relevant [dudit] Accord et exercer les autres fonctions que peut lui confier le Conseil »;

RAPPELANT les recommandations initiales formulées dans la lettre adressée le 24 novembre 2020 aux représentants suppléants, à propos du budget et du prochain plan opérationnel de la CCE;

RAPPELANT l’avis au conseil n° 20-01 du CCPM, intitulé *Consultation publique sur l’ébauche de Plan stratégique de la CCE pour 2021 à 2025*;

RAPPELANT le paragraphe 6(5) de l’ACE, qui stipule que « [le] Comité consultatif public mixte, en coordination avec le Secrétariat, contribue à favoriser et à accroître la participation du public dans la mise en œuvre du présent accord »;

RAPPELANT le paragraphe 11(1) de l’ACE, qui stipule qu’« [a]u cours de la préparation du programme de travail, le Conseil prévoit et favorise, s’il y a lieu, la diffusion d’information et la participation du public en ce qui concerne la conception, la réalisation et la surveillance des activités et des projets envisagés dans le programme de travail, ce qui comprend la prise en considération des perspectives autochtones »;

AYANT examiné l’ébauche de la description du projet intitulé *Accroissement de la transparence dans la chaîne d’approvisionnement au sujet des substances chimiques que renferment les produits* et le budget connexe;

ET AYANT mené une consultation publique en ligne à propos de la description de ce projet, du 14 mars au 4 avril 2022, puis passé en revue les commentaires reçus des 14 participants représentant divers intervenants à l’échelle de l’Amérique du Nord¹ (voir l’annexe 1);

SOUMET à l’examen du Conseil les recommandations et commentaires qui suivent à propos de ce nouveau projet trilatéral :

Le CCPM salue les efforts qu’ont déployés les Parties pour élaborer le projet et convient, tout comme le public, qu’il est essentiel de renforcer la transparence de la chaîne d’approvisionnement au sujet des substances chimiques présentes dans les produits afin de garantir la protection à long

¹ Les commentaires se répartissaient comme suit : 6 du Mexique, 5 des États-Unis, 2 du Canada et un autre.

terme de la santé publique et de l'environnement. Étant donné que le CCPM joue un rôle clé dans la promotion des activités de la CCE et la participation du public à ces activités, et parce qu'il est important de recourir à des mécanismes efficaces pour consulter le public nord-américain, il souhaite soumettre à l'attention des Parties certains commentaires et certaines préoccupations d'ordre général qu'a formulés le public à propos de la description du projet, notamment en ce qui concerne sa portée et ses objectifs, qui manquent de clarté et pourraient donc limiter ou empêcher une participation constructive des intervenants. Le CCPM convient que pour mener des activités de consultation publique, il est essentiel de fournir des renseignements adéquats pour que la participation des intervenants soit claire, ouverte et transparente. Ce faisant, il recommande de poursuivre les discussions avec les intervenants concernés tout en finalisant la description du projet.

Dans le cadre de la consultation, la CCE a demandé aux membres du public de lui faire part de leurs impressions et suggestions à propos des problèmes, des enjeux ou des approches qui ont trait à la transparence de la chaîne d'approvisionnement au sujet des substances chimiques que contiennent les produits, et dont il faudrait tenir compte dans le cadre de ce projet. Les commentaires du public ont porté sur les éléments suivants :

- Problèmes à prendre en compte :
 - Le manque d'information à propos des matières recyclées.
 - Le manque d'information de la part des fournisseurs à propos de leurs produits.
 - Le manque de données scientifiques à jour.
 - Une normalisation insuffisante des gabarits et des définitions, ce qui nuit à l'échange d'information entre les entreprises.
 - Les renseignements commerciaux confidentiels.
 - Le lobbying exercé par certaines associations en vue de limiter l'accès à l'information.
 - L'accès à l'information (p. ex. l'accès du public à l'information, les systèmes d'information contenant des bases de données unifiées, l'étiquetage, etc.).
 - La réglementation relative aux nouvelles toxines.

- Enjeux à prendre en compte :
 - Les limites de la divulgation (p. ex. les substances chimiques présentes intentionnellement ou non dans les produits, qu'il s'agisse de toutes les substances ou uniquement de celles qui sont préoccupantes).
 - L'information relative au cycle de vie des produits.
 - La capacité d'application de la loi (p. ex. les contrôles douaniers et le renforcement des capacités).
 - Les lois nationales et les certifications commerciales en vigueur.
 - Les substances chimiques présentes dans les produits agricoles, le bétail, l'industrie alimentaire et les produits en aérosol.
 - Les effets des substances chimiques sur le développement neurologique des enfants.
 - L'acquisition d'une compréhension commune des exigences actuelles à l'échelle du Canada, du Mexique et des États-Unis à l'égard des divers types de produits.

- Approches potentielles à prendre en compte :

- L'établissement d'une liste de substances acceptées afin d'empêcher que des substances chimiques nocives ne se répandent sur le marché à cause des produits qui en contiennent.
- L'inclusion dans le projet de tous les intervenants et organismes de réglementation concernés (voir l'annexe 2).
- L'encouragement des intervenants à contribuer à définir en quoi consiste une « substance préoccupante ».
- La prise en considération d'utilisations et de scénarios d'exposition bien précis dans les listes de substances préoccupantes.
- Les tendances du marché résultant d'une demande croissante de produits sains de la part du public, afin d'inciter les entreprises à faire preuve d'une plus grande transparence.

En outre, tout comme le public, le CCPM convient que pour éviter les chevauchements, il faut s'appuyer sur les activités et les études existantes, notamment celles qu'ont mentionnées les Parties au point 7 de la description du projet, intitulé *Décrire de quelle façon le projet complémente d'autres travaux menés à l'échelle nationale ou internationale, ou évite les chevauchements avec de tels travaux.*

Pour terminer, nous tenons à remercier tous les répondants pour leur rétroaction et leur contribution. Même s'il n'a pas été possible d'intégrer directement au présent avis tous les précieux commentaires et suggestions reçus, le CCPM est convaincu que la CCE les trouvera extrêmement utiles à l'avenir, lorsqu'elle élaborera et mettra en œuvre ce projet et des projets connexes.

Les membres du CCPM sont convaincus que les recommandations formulées dans le présent document donnent suite aux priorités stratégiques du Conseil de la CCE et cautionnent unanimement ledit avis.

**Approuvé par les membres du CCPM
le 18 avril 2022**

Annexe 1 - Commentaires reçus

#1

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
Started: Monday, March 14, 2022 5:29:44 PM
Last Modified: Monday, March 14, 2022 5:38:11 PM
Time Spent: 00:08:27
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Page 1: JPAC Public Consultation

Q1

Individual information:

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Country: US

Q2 **International Organization,**
Sector **NGO (Non-governmental, Non-profit, Civil association, etc.)**

Q3

1. Do you currently see your organization or institution playing any type of role in the activities of this project, such as offering input, participating in project workshops or consultation, or being part of a pilot project? If so, please tell us more about your potential participation or contribution to the project activities.

We specialize in international grant making from US donors to LatinAmerica (>80% of our grants are directed to Mexico) and we help civil organizations get stronger and fund projects on health, environment, education and migration. We look forward to participating with input, in workshops, etc. Thanks!

Q4

2. Please tell us of other organizations or institutions with which you think we should engage during the implementation of the project.

While there is no 1-organization that encompasses all Mexican funders (based in the US or based in MX), we think CEC is key to open a space for all community foundations and private foundations all 3 countries to convene to collaborate and attend to environmental priorities together regarding supply chain information (or lack of it) on chemicals in products.

Q5

3. Please tell us of any ongoing challenges, issues, or approaches related to supply chain transparency for chemicals in products that we should consider as part of this project.

Creating awareness on what we are funding is a must. For example, in a previous job I had, I was working on a river-restoration project funded by a US donor and their US restoration consultant recommended using round-up for weed control).

Q6

4. Please provide any additional comments you would like to share with us about the project.

As a Mexican working in the US in an international grant making organization, I am very appreciative of the opportunity to provide input and connect with other stakeholders through CEC. Thanks!

#2

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
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Q1

Individual information:

Name: Stephen Fuller
Organization: TCO Development
Email Address: stephen.fuller@tcodevelopment.com
Country: Sweden

Q2

Sector NGO (Non-governmental, Non-profit, Civil association, etc.)

Q3

1. Do you currently see your organization or institution playing any type of role in the activities of this project, such as offering input, participating in project workshops or consultation, or being part of a pilot project? If so, please tell us more about your potential participation or contribution to the project activities.

TCO Certified is a global certification for sustainable IT www.tcocertified.com.

Since 2015 I have been responsible for creating and implementing criteria on safer substitution to restricted substance used in flame retardants, plasticizers and production line cleaning solvents. We require that these substances must be independently assessed and appear on our public accepted substance list if they are to be used in the certified product or on production lines of the certified product.

Q4

2. Please tell us of other organizations or institutions with which you think we should engage during the implementation of the project.

Clean Production Action,
Toxservices,
Pharos,

Q5

3. Please tell us of any ongoing challenges, issues, or approaches related to supply chain transparency for chemicals in products that we should consider as part of this project.

The majority approach is working with restricted substance lists created by the product/brand owner. This leaves it open for suppliers to remain non-transparent about the alternatives they use instead.

Q6

4. Please provide any additional comments you would like to share with us about the project.

The best way to prevent harmful chemicals reaching the market in products is to create an accepted substance list and require that only chemicals on the list may be used. Suppliers or manufacturers will either then switch to using the safer substance on the list or have their substance independently assessed as safer and added to the list. This is what we have done in TCO Certified. If it's possible for the electronics industry to adapt to the positive list strategy, then other types of products and their supply chains can also. It requires the right incentives for the brands and suppliers to make the transition, since to do so means they retain business. To not do so means losing business.

#3

COMPLETE

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Q1

Individual information:

Name: Joel Tickner
Organization: Lowell Center for Sustainable Production - UMass Lowell
Email Address: joel_tickner@uml.edu
Country: US

Q2

Sector Academia (students, staff, Faculty members, researchers etc., from different levels of educational systems)

Q3

1. Do you currently see your organization or institution playing any type of role in the activities of this project, such as offering input, participating in project workshops or consultation, or being part of a pilot project? If so, please tell us more about your potential participation or contribution to the project activities.

Yes - we have conducted numerous studies on tools and policies for supply chain transparency and work closely with industry on this through our Green Chemistry & Commerce Council.

Q4

2. Please tell us of other organizations or institutions with which you think we should engage during the implementation of the project.

Interstate Chemicals Clearinghouse (IC2) works with states and others on ingredient transparency; NGOs such as Toxic Free Future, Environmental Working Group, Breast Cancer Prevention Partners, Womens Voices for the Earth work on transparency policies; Responsible Purchasing Network and Sustainable Purchasing Leadership Council and Product Stewardship Society and other organizations that work at a sectoral level such as IMDS and HPD collaborative; providers of transparency services such as ToxNot, UL, SciVera; government agencies such as EPA, DoD, and states such as CA, NY, WA, OR that have transparency policies in place. Trade associations such as HCPA and PCPC

Q5

3. Please tell us of any ongoing challenges, issues, or approaches related to supply chain transparency for chemicals in products that we should consider as part of this project.

There have been numerous studies on this question and the Canadian consultation will also bring those up. CBI is always one; the boundaries of disclosure (intentional/non-intentional at a product category level; all chemicals or just chemicals of concern, etc). We have done research for the Canadian government on this subject as well.

Q6

4. Please provide any additional comments you would like to share with us about the project.

It makes no sense to reinvent the wheel as some of the discussions now being had are more than 10 years old. The time is ripe for clear solutions to the challenges that respond to growing demands in the marketplace and policy such as in Europe. It would make sense to not reinvent the wheel but build on other initiatives already underway.

#4

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
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Q1

Individual information:

Name: Rohini Peris
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- Environmental Health Association of Québec
Email Address: office@aseq-ehaq.ca
Country: Canada

Q2

Sector NGO (Non-governmental, Non-profit, Civil association, etc.)

Q3

1. Do you currently see your organization or institution playing any type of role in the activities of this project, such as offering input, participating in project workshops or consultation, or being part of a pilot project? If so, please tell us more about your potential participation or contribution to the project activities.

The Environmental Health Association of Québec helps and supports people whose lives have been severely impacted with Multiple Chemical Sensitivity (MCS), a chronic health condition and recognised disability by the Canadian Human Rights Commission, protected under the Canadian Human Rights Act. In Canada, 1,130,800 people have a diagnosis of this disability, of which 72% are women and close to 50% are over the age of 55 (Statistics Canada, CCHS, 2020), and the prevalence is increasing (CCHS, 2000-2020). MCS can be caused by sensitisation to chemicals found in commonly used products and subsequent exposures can trigger multiple symptoms in multiple body systems (Masri et al, 2021; Molot et al, 2021). The sensitisation and triggering process can lead to reactions to also very low levels of chemicals thus increasing the disability and leading to loss of quality of life, loss of employment, food and housing insecurity, poverty, homelessness, stigmatisation and isolation. This neglected, under-served MCS population falls through the cracks of health care and social services, and other support systems in place to help, support and protect society. Our mission therefore includes support, advocacy, research, education and awareness for people experiencing MCS, and also for the general public. We educate on healthy, least-toxic choices and applications for everyday living, in order to support the MCS population, and to prevent the increase in prevalence. Given this background and our urgent need for healthy products, we are very interested in participating in workshops, consultations or being part of a pilot project.

Q4

2. Please tell us of other organizations or institutions with which you think we should engage during the implementation of the project.

The Environmental Health Associations across Canada have closed down because people with the disability of MCS had to run them. So presently, even though we have a provincial mandate, we work at a national level to meet a need.

I would recommend the New Brunswick Lung Association and its sister organisation, the Canadian Network for Human Health and the Environment.

Q5

3. Please tell us of any ongoing challenges, issues, or approaches related to supply chain transparency for chemicals in products that we should consider as part of this project.

The population we work with have serious issues being (medically) accommodated for their disability due to the fact that there is resistance to provide accessibility for this disability due to a lack of information on products. The general public generally believe that products on the shelf are 'safe' since this is Canada, and since Health Canada regulates what is being used in Canada. Transparency issues have to be a central requirement, and one way to ensure this, is to place 'health' and the 'environment' at the top and central to all issues. And to then work outwards towards placing the right to know, over the right to protect information. Ultimately there will be compliance as businesses follow market trends. We can see the increase in products claiming to be healthy, available to the public. Obviously the need for healthy products is growing, and to achieve this change in a meaningful manner, and even for all other products, transparency is necessary.

Q6

4. Please provide any additional comments you would like to share with us about the project.

I think that this is a very important project not just for the present and the near future, but for future generations and for our planet. Thank you.

#5

COMPLETE

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Q1

Individual information:

Name: Mark Rossi
Organization: Clean Production Action
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Country: USA

Q2

Sector NGO (Non-governmental, Non-profit, Civil association, etc.)

Q3

1. Do you currently see your organization or institution playing any type of role in the activities of this project, such as offering input, participating in project workshops or consultation, or being part of a pilot project? If so, please tell us more about your potential participation or contribution to the project activities.

Yes, by offering input, and participating in project workshops or consultations.

Q4

2. Please tell us of other organizations or institutions with which you think we should engage during the implementation of the project.

* Health Product Declaration Collaborative - <https://www.hpd-collaborative.org/>

* Northeast Waste Management Officials' Agency - Interstate Chemicals Clearinghouse <https://theic2.org/>

Q5

3. Please tell us of any ongoing challenges, issues, or approaches related to supply chain transparency for chemicals in products that we should consider as part of this project.

The Principles for Chemical Ingredient Disclosure created by Clean Production Action and the Interstate Chemicals Clearinghouse set aspirations for ingredient disclosure (<https://www.bizngo.org/public-policies/principles-for-chemical-ingredient-disclosure>). However, attaining the Principles in practice is a challenge. For example:

PRINCIPLE #1. DISCLOSE ALL INTENTIONALLY ADDED CHEMICALS.

CHALLENGE: Manufacturers, especially of articles, are challenged to get full disclosure of all intentionally added chemicals in all the materials in their products from suppliers. Plastics and specialty formulated products, such as adhesives, are often difficult to attain full disclosure

PRINCIPLE #2. DISCLOSE NONFUNCTIONAL CONSTITUENTS THAT ARE IDENTIFIED ON SPECIFIED LISTS OF CHEMICALS OF CONCERN

CHALLENGE: Often times suppliers do not test for and confirm the absence of nonfunctional constituents, which the Principles define as: "a chemical that has no functional or technical effect on the designated product and is present as an incidental component of an intentionally added ingredient, a breakdown product of an intentionally added ingredient, or a byproduct of the manufacturing process."

PRINCIPLE #4. ADVOCATE FOR FILLING DATA GAPS TO CHARACTERIZE THE HAZARDS OF CHEMICALS

CHALLENGE: Most manufacturers do not have access to comprehensive toxicity data on the hazards of all chemicals contained in their products.

PRINCIPLE #5. MAKE ACCURATE CHEMICAL INGREDIENT INFORMATION EASILY ACCESSIBLE TO CONSUMERS, GOVERNMENT AGENCIES, MANUFACTURERS, BRANDS, RETAILERS, AND OTHERS IN THE SUPPLY CHAIN.

CHALLENGE: Common templates and definitions are lacking across supply chains, resulting in challenges of sharing this information from business-to-business and ultimately from business-to-consumer.

Additionally recycled content is a growing challenge in supply chain transparency, because no one in the supply chain knows what is in recycled content.

Q6

4. Please provide any additional comments you would like to share with us about the project.

Interesting model legislation is the Cosmetic Supply Chain Transparency Act introduced in the U.S. Congress by Representative Schakowsky (HB 5539). <https://www.congress.gov/bill/117th-congress/house-bill/5539/text#:~:text=A%20BILL-,To%20amend%20title%20VI%20of%20the%20Federal%20Food%2C%20Drug%2C%20and,SECTION%201.>

#6

COMPLETE

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Page 1: JPAC Public Consultation

Q1

Individual information:

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Country: United States

Q2

Sector Private Sector (any organization/individual working with the goal of promoting profit in its administrative model)

Q3

1. Do you currently see your organization or institution playing any type of role in the activities of this project, such as offering input, participating in project workshops or consultation, or being part of a pilot project? If so, please tell us more about your potential participation or contribution to the project activities.

Yes. HCPA represents companies that manufacture, formulate, distribute, sell and recycle products for household, institutional, commercial, and industrial use. HCPA has been a proponent of chemical transparency to consumers and workers.

Q4

2. Please tell us of other organizations or institutions with which you think we should engage during the implementation of the project.

Before HCPA is able to provide input on this question, we believe that this project needs to have a more descriptive scope so that stakeholders are able to provide meaningful information.

Q5

3. Please tell us of any ongoing challenges, issues, or approaches related to supply chain transparency for chemicals in products that we should consider as part of this project.

As with our response to the second question, we fail to understand the problem which the CEC seeks to address. As such, we are unclear as how to best provide feedback without an updated draft project description that better conveys the issues and opportunities.

Q6

4. Please provide any additional comments you would like to share with us about the project.

HCPA is submitting a letter detailing our full comments for consideration. If you would like to discuss our feedback, please do not hesitate to contact us.

April 4, 2022

To the Joint Public Advisory Committee,

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to offer comments during the public consultation on a new initiative by the Commission for Environmental Cooperation (CEC) that seeks to advance supply chain transparency with regard to chemicals used in products. HCPA supports transparency throughout the entire supply chain, from raw material manufacturers to formulators and brand owners all the way to the consumers and workers that use chemical products to improve their daily lives.

HCPA is a voluntary, non-profit U.S. trade association representing approximately 250 companies engaged in the manufacture, formulation, distribution, sale and recycling of products for household, institutional, commercial and industrial use. HCPA member companies' wide range of products includes home, lawn and garden pesticides, antimicrobial products, air care products, automotive specialty products, detergents and cleaning products, polishes and floor maintenance products, and various types of aerosol products. HCPA and our member companies have been a proponent of chemical transparency to consumers and workers of cleaning and disinfecting products, as evidence by our active engagement and support of the California Cleaning Right to Know Act of 2017² which was a carefully crafted compromise developed through NGO-industry stakeholder negotiations. This law has not only improved the transparency of cleaning and disinfecting products for people in California but has become the *de facto* standard across the United States and even provides benefits to those in Canada and Mexico because the ingredient information for these products is available online for anyone to review. Even before passage of this law, many of our member companies already were providing information regarding the chemical composition of their products to consumers on their websites through voluntary initiatives.

HCPA is concerned by the unclear objectives presented within the draft project description³, that not all of the appropriate national government agencies have been identified to collaborate on this project and may duplicate of existing efforts. HCPA believes that more information is needed within the draft project description to properly convey complete information on the nature of the issue which the CEC wishes to discuss, including a clear public interest rationale. What is currently presented is not articulated in a manner for meaningful public engagement. Providing adequate information to support clear, open, and transparent stakeholder engagement is needed before proceeding with the project and ensuring that this project will have meaningful outputs.

¹ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

² https://leginfo.ca.gov/faces/billNavClient.xhtml?bill_id=201720180SB258

³ http://www.cec.org/files/documents/supply-chain-transparency-project-description_en.pdf

The stated goal is to foster collaboration among Canada, Mexico, and the United States to improve supply chain transparency and enhance governments' ability to identify and prevent products containing chemicals of concern, or chemical substitutes of concern, from entering or re-entering the economy. However, it is not clear what products are within the scope of effort, let alone, the chemicals of concerns – and within the United States, the scope of products under consideration will alter the regulatory entities under engagement. Each government has variety regulations to ensure that products are safe when used in accordance with label directions are within commerce and mechanisms to remove chemicals or products that are deemed to be unsafe to human health and the environment. An important starting point for a project of this nature would be to ensure a common understanding of current requirements across Canada, Mexico, and the United States for various types of products. Perhaps this is an unstated point of the exercise, but without a well-defined scope the effort will have a difficult time achieving its stated goals.

For this project to be successful, HCPA believes that either the scope needs to be narrowed and aligned with the appropriate government agencies amongst the three countries; or the number of government agencies involved in the activity needs to be significantly expanded to encompass the requisite entities the right expertise and responsibility. For example, within the United States, government agencies such as the Consumer Product Safety Commission, Food and Drug Administration, Occupation Safety and Health Administration, and the Environmental Protection Agency, Office of Pesticide Programs, would all need be involved in such an effort. Because each authority of jurisdiction has their own set of laws and regulations, their expertise in their areas is critical to ensure that any potential solution that is discussed is appropriate for the products that they are responsible for.

HCPA does not believe the problem has been adequately stated for stakeholders to provide meaningful information on the draft project description and requests that more specific information is provided to stakeholders for another round of comments before the project details are finalized. More details regarding this project are critical so that stakeholders are able to provide worthwhile input. As a trade association representing member companies that manufacture, formulate, supply, market, and recycle a variety of products used by consumers, we fail to understand the problem which the CEC seeks to address. As such, we are unclear as how to best provide feedback without an updated draft project description that better conveys the issues and opportunities.

HCPA appreciates the opportunity to provide this letter. If you would like to discuss the contents of this letter or how HCPA and our member companies have been working to provide consumers information on the chemical composition of member products, please contact me at ngeorges@thehcpa.org.

Respectfully submitted,



Nicholas B. Georges
Senior Vice President, Scientific & International Affairs

#7

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
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Page 1: JPAC Public Consultation

Q1

Individual information:

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Country: United States

Q2

Sector

Private Sector (any organization/individual working with the goal of promoting profit in its administrative model)

Q3

1. Do you currently see your organization or institution playing any type of role in the activities of this project, such as offering input, participating in project workshops or consultation, or being part of a pilot project? If so, please tell us more about your potential participation or contribution to the project activities.

ACC is extensively involved in chemical value chain issues, disclosure initiatives, etc. and has significant expertise on such matters. ACC has specific experience in material declaration, for example as stewards of GADSL, the global automotive declarable substance list. However, as the current scope of the project is quite broad, we would need more information about the objectives of the project to consider further what role, if any, ACC would play in any proposed activities

Q4

2. Please tell us of other organizations or institutions with which you think we should engage during the implementation of the project.

This would depend on how the project is further scoped. We recommend engaging with key value chain trade associations that are most familiar with disclosure in specific value chains as well as waste and recycling industries, both in conventional and advanced recycling

Q5

3. Please tell us of any ongoing challenges, issues, or approaches related to supply chain transparency for chemicals in products that we should consider as part of this project.

Chemicals are critical inputs for all supply chains, which makes supply chain transparency a broad and complex issue. Much of the project seemed focused on circularity, which is concerned with resource efficiency, waste reduction, creating value for “waste” streams so that reuse is increased. Transparency for circularity does not generally refer to transparency of ingredients in products but rather, the transparency of the methodology used to determine a product’s contribution to the circular economy. These methods should be transparent to allow for consistency, comparability and tracking progress. Circularity may also involve “traceability” of materials in order to track their disposition and enable reuse.

Q6

4. Please provide any additional comments you would like to share with us about the project.

The project scoping document notes the need for disclosure of “substances of concern” in the supply chain. We encourage stakeholder input on the definition of what constitutes a substance of concern. U.S., Canadian, and Mexican regulators have an important role in evaluating substances and restrict substance uses that pose an unreasonable risk to human health and/or the environment. Regulatory agencies are the key authorities for which substance are “of concern.” and we would discourage a reliance on hazard-based “substances of concern” lists that do not consider specific uses and exposure scenarios, or are not based on any specific regulatory action.

#1

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
Started: Monday, March 14, 2022 2:32:24 PM
Last Modified: Monday, March 14, 2022 3:08:49 PM
Time Spent: 00:36:24
IP Address: 201.102.58.240

Page 1

Q1

Información personal:

Nombre: David Fernando Huerta Colosia
Organización: Independiente
Correo electrónico: huerta.colosia.david@hotmail.com
País: México

Q2

Sector: Personas físicas (ciudadanos particulares sin afiliación oficial a otras categorías)
,
Jóvenes (de hasta 30 años)

Q3

1. ¿Considera que la organización o institución a la que usted pertenece puede desempeñar alguna función en las actividades de este proyecto, como ofrecer aportaciones, participar en las consultas o talleres a realizarse, o formar parte de un proyecto piloto? Si su respuesta es afirmativa, comuníquenos más detalles sobre su posible participación o contribución a las actividades del proyecto.

Si, durante 5 años colaboré con el Instituto Nacional de Ecología y Cambio Climático en México, donde entre mis actividades se encontraba el manejo de la base de datos de comercio de productos químicos, cuantificando la cantidad que se comercializó de 2010 a 2021, identificando las áreas frágiles por las cuales se encontraban irregularidades en el manejo de los productos, desde una ineficaz clasificación arancelaria hasta descripciones de los productos insuficientes. Mi contribución puede ir desde la participación directa en el desarrollo del proyecto como consultor, como asesor compartiendo mi experiencia o participación en talleres informativos, en función de las necesidades de la CCA

Q4

2. Mencione otras organizaciones o instituciones con las que, en su opinión, deberíamos colaborar durante la implementación del proyecto.

Secretarías de Economía y dependencias de control aduanal;
Industria privada particularmente con manejo de sustancias químicas y materiales peligrosos;
INECC (México)

Q5

3. Señale cualesquiera desafíos, problemas o estrategias relacionados con la transparencia en la cadena de suministro de las sustancias químicas utilizadas en los productos de consumo que deberíamos considerar en este proyecto.

Sistema de identificación durante el ciclo de vida de la sustancia/material
Control aduanal
Sistema de clasificación arancelaria
Capacitación del personal de identificación y control de productos
Diseño informático adecuado para una base de datos unificada
Acceso público a la información

Q6

4. Proporcione cualquier comentario adicional que desee compartir con nosotros en torno al proyecto.

-

#2

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
Started: Tuesday, March 15, 2022 4:17:05 PM
Last Modified: Tuesday, March 15, 2022 4:32:03 PM
Time Spent: 00:14:57
IP Address: 189.147.80.238

Page 1

Q1

Información personal:

Nombre: MARISA JACOTT
Organización: FRONTERAS COMUNES
Correo electrónico: marisajacott@gmail.com
País: México

Q2

Sector:

ONG (organizaciones no gubernamentales, sin ánimo de lucro, asociaciones civiles, etc.)

Q3

1. ¿Considera que la organización o institución a la que usted pertenece puede desempeñar alguna función en las actividades de este proyecto, como ofrecer aportaciones, participar en las consultas o talleres a realizarse, o formar parte de un proyecto piloto? Si su respuesta es afirmativa, comuníquenos más detalles sobre su posible participación o contribución a las actividades del proyecto.

Sí. Fronteras Comunes lleva más de una década trabajando para que en México tengamos una Ley General en Materia de Sustancias Químicas, asimetría tremenda entre los 3 países el que México carezca de esta legislación. También falta la consolidación del Inventario Nacional de Sustancias Químicas el cual existe con información básicamente del RETC y no de otras fuentes fundamentales como sería aquí la información que pudiera proporcionar la ANIQ. ADEMÁS, existen muchas sustancias químicas prohibidas o restringidas en Estados Unidos y/o Canadá que México aún utiliza como por ejemplo el bisfenol A, aditivos en plásticos, pvc en productos de consumo para bebés e infantes, retardantes y metales pesados en electrónicos, plomo en cerámica, plaguicidas, antisépticos y un sin fin de sustancias químicas puestas en productos de consumo además no etiquetadas.

Q4

2. Mencione otras organizaciones o instituciones con las que, en su opinión, deberíamos colaborar durante la implementación del proyecto.

Ya esta en el proyecto pero es importantísimo recalcar la participación de la ANIQ en este proyecto. Es la industria química y petroquímica la que debe dar la información de las sustancias químicas en productos de consumo.

Faltaría agregar al proyecto la participación de la Secretaría de Salud en México, y diferentes cámaras como la de productos electrónicos CANIETI, la pinturas (ANAFAPIT), agroquímicos-plaguicidas,

Q5

3. Señale cualesquiera desafíos, problemas o estrategias relacionados con la transparencia en la cadena de suministro de las sustancias químicas utilizadas en los productos de consumo que deberíamos considerar en este proyecto.

La fuerte resistencia de cámaras como la ANIQ a brindar información sobre los productos que ponen en el mercado mexicano y la falta de transparencia y organización del gobierno de Mexico.

Q6

4. Proporcione cualquier comentario adicional que desee compartir con nosotros en torno al proyecto.

Fronteras Comunes actualmente se encuentra trabajando sobre la NO CIRCULARIDAD de los plásticos en un análisis de todo el ciclo de vida del plástico y sus afectaciones de contaminación química, además de la física.

#3

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
Started: Tuesday, March 15, 2022 5:06:04 PM
Last Modified: Tuesday, March 15, 2022 9:07:34 PM
Time Spent: 04:01:30
IP Address: 189.154.92.76

Page 1

Q1

Información personal:

Nombre: Víctor M. Ortiz Franco
Organización: Fundación para la Conservación del Río Conchos, A.C.
Correo electrónico: conchos@uach.mx
País: México

Q2

Sector: Esfera académica (estudiantes, personal, miembros de la facultad, investigadores, etc., de diferentes niveles del sistema educativo)
,
Organizaciones internacionales,
ONG (organizaciones no gubernamentales, sin ánimo de lucro, asociaciones civiles, etc.)

Q3

1. ¿Considera que la organización o institución a la que usted pertenece puede desempeñar alguna función en las actividades de este proyecto, como ofrecer aportaciones, participar en las consultas o talleres a realizarse, o formar parte de un proyecto piloto? Si su respuesta es afirmativa, comuníquenos más detalles sobre su posible participación o contribución a las actividades del proyecto.

tenemos consejos regionales en la cuenca del rio conchos y pudiera funcionar como enlace para difundir los preceptos de su proyecto con la única intención que estén a favor del medio ambiente , defensa de los ecosistemas ribereños y el desarrollo sustentable

Q4

2. Mencione otras organizaciones o instituciones con las que, en su opinión, deberíamos colaborar durante la implementación del proyecto.

por un San Borjas mejor, A.C .ETUMAJAC, Julimes

Q5

3. Señale cualesquiera desafíos, problemas o estrategias relacionados con la transparencia en la cadena de suministro de las sustancias químicas utilizadas en los productos de consumo que deberíamos considerar en este proyecto.

algunos agroquímicos utilizados por agricultores como ejemplo foliares, o plaguicidas en los cultivos de Cacahuete y hortalizas en los distritos de riego 113, 005 y 090 en Chihuahua

Q6

4. Proporcione cualquier comentario adicional que desee compartir con nosotros en torno al proyecto.

nuestro principal problema es la contaminación hidrológica, suelos y sobreexplotación de acuíferos. Según nuestros propios diagnósticos esto se solucionaría parcialmente atendiendo las causas mediante supresión pero con asesoría y capacitación avanzaríamos

#4

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
Started: Friday, March 18, 2022 1:59:52 AM
Last Modified: Friday, March 18, 2022 2:04:43 AM
Time Spent: 00:04:50
IP Address: 201.137.167.253

Page 1

Q1

Información personal:

Nombre: Sergio Osvaldo Cruz
Organización: Inoqua Soluciones
Correo electrónico: cruzromo@yahoo.com
País: México

Q2

Sector: Sector privado (cualquier organización/individuo cuyo modelo administrativo trabaja con fines de lucro)

Q3

1. ¿Considera que la organización o institución a la que usted pertenece puede desempeñar alguna función en las actividades de este proyecto, como ofrecer aportaciones, participar en las consultas o talleres a realizarse, o formar parte de un proyecto piloto? Si su respuesta es afirmativa, comuníquenos más detalles sobre su posible participación o contribución a las actividades del proyecto.

Si. Implementar requisitos de exportación a EEUU y México. Requisitos sanitarios, zoonosanitarios y requisitos para certificaciones globales de Inocuidad como GFSI.

Q4

2. Mencione otras organizaciones o instituciones con las que, en su opinión, deberíamos colaborar durante la implementación del proyecto.

Organismos gremiales y empresariales.

Q5

3. Señale cualesquiera desafíos, problemas o estrategias relacionados con la transparencia en la cadena de suministro de las sustancias químicas utilizadas en los productos de consumo que deberíamos considerar en este proyecto.

Las empresas que vendan productos deben cumplir con las reglas de cada país, así como con certificaciones comerciales como GFSI.

Q6

4. Proporcione cualquier comentario adicional que desee compartir con nosotros en torno al proyecto.

Estamos para apoyarlos en lo que se pueda.

#5

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
Started: Monday, March 21, 2022 9:13:32 PM
Last Modified: Monday, March 21, 2022 9:22:48 PM
Time Spent: 00:09:16
IP Address: 201.152.210.190

Page 1

Q1

Información personal:

Nombre: Fernando Díaz-Barriga
Organización: Universidad Autónoma de San Luis Potosí, Facultad de Medicina
Correo electrónico: fdia@uaslp.mx
País: México

Q2

Sector: Esfera académica (estudiantes, personal, miembros de la facultad, investigadores, etc., de diferentes niveles del sistema educativo)

Q3

1. ¿Considera que la organización o institución a la que usted pertenece puede desempeñar alguna función en las actividades de este proyecto, como ofrecer aportaciones, participar en las consultas o talleres a realizarse, o formar parte de un proyecto piloto? Si su respuesta es afirmativa, comuníquenos más detalles sobre su posible participación o contribución a las actividades del proyecto.

Si, a través del análisis analítico de contaminantes emergentes en diferentes matrices biológicas o ambientales.

Sí, a través de programas de comunicación de riesgos en salud para la población general.

Sí, por medio de talleres de capacitación a laboratorios de la Región.

Si, participando en proyectos piloto multicéntricos

Sí, generando CAPAS de Protección (Capacidades y Alternativas para la Prevención de Amenazas Sindémicas),

Sí, creando estrategias que vinculen al proyecto con los derechos de las niñas, los niños y los adolescentes.

Q4

2. Mencione otras organizaciones o instituciones con las que, en su opinión, deberíamos colaborar durante la implementación del proyecto.

Instituto Nacional de Salud Pública (diversas áreas).

CINVESTAV-IPN (Departamento de Toxicología).

Organización Panamericana de la Salud

Q5

3. Señale cualesquiera desafíos, problemas o estrategias relacionados con la transparencia en la cadena de suministro de las sustancias químicas utilizadas en los productos de consumo que deberíamos considerar en este proyecto.

1. Falta de información científica actualizada (por ejemplo presencia de flúor en sal de mesa o en pasta dental).
 2. Falta de conocimiento químico (por ejemplo uso de plásticos reciclados que facilitan la presencia de ftalatos en bolsas o botellas de agua).
 3. Manejo de aflatoxinas en productos de maíz.
-

Q6

4. Proporcione cualquier comentario adicional que desee compartir con nosotros en torno al proyecto.

El proyecto es fundamental para la protección de la salud, pero en tanto no se visibilicen los riesgos en salud para el neurodesarrollo infantil de los químicos, no se fomentará la necesidad de buscar nuevos tóxicos en los alimentos. Siempre será más fácil ignorar que actuar. Ahora bien, ante la falta de reglamentos para los tóxicos emergentes, la aplicación del derecho a la salud bastará para actuar.

#6

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
Started: Monday, April 04, 2022 11:45:46 PM
Last Modified: Tuesday, April 05, 2022 12:09:17 AM
Time Spent: 00:23:30
IP Address: 177.232.4.251

Page 1

Q1

Información personal:

Nombre: EDUARDO DE JESÚS RUIZ FERNÁNDEZ
Organización: UNIVERSIDAD AUTÓNOMA DE ZACATECAS
Correo electrónico: eduardoruizf@outlook.es
País: MÉXICO

Q2

Sector: Esfera académica (estudiantes, personal, miembros de la facultad, investigadores, etc., de diferentes niveles del sistema educativo)

Q3

1. ¿Considera que la organización o institución a la que usted pertenece puede desempeñar alguna función en las actividades de este proyecto, como ofrecer aportaciones, participar en las consultas o talleres a realizarse, o formar parte de un proyecto piloto? Si su respuesta es afirmativa, comuníquenos más detalles sobre su posible participación o contribución a las actividades del proyecto.

COMO PARTE DE LA PLANTA DOCENTE DE MI UNIVERSIDAD, TENEMOS LA FORMA DE PARTICIPAR EN ACCIONES COMO RASTREO DE SUSTANCIAS PELIGROSAS EN PRODUCTOS DE USO Y CONSUMO COMÚN ASÍ COMO DE EMPRENDIMIENTO VERDE.

ACTUALMENTE IMPARTO LAS CÁTEDRAS DE 1.- SALUD PÚBLICA VETERINARIA, 2.- AMBIENTE Y DESARROLLO SUSTENTABLE, 3.- ECOLOGÍA, PRODUCCIÓN DE FORRAJES, 4.- PRODUCCIÓN DE RUMIANTES EN AGOSTADERO, 5.- VIROLOGÍA VETERINARIA Y 6.- MANEJO Y ECOLOGÍA DE PASTIZALES A ALUMNOS DE MI FACULTAD, QUIENES TAMBIEN PUEDEN COLABORAR ACTIVAMENTE EN PROYECTOS Y ACCIONES IMPULSADAS POR LA CCA.

Q4

2. Mencione otras organizaciones o instituciones con las que, en su opinión, deberíamos colaborar durante la implementación del proyecto.

- 1.- UNIONES GANADERAS DE MÉXICO
 - 2.- SECRETARIA DE AGRICULTURA, GANADERÍA, PESCA Y ALIMENTACIÓN (SAGARPA)
 - 3.- SECRETARIA DE SALUD.
-

Q5

3. Señale cualesquiera desafíos, problemas o estrategias relacionados con la transparencia en la cadena de suministro de las sustancias químicas utilizadas en los productos de consumo que deberíamos considerar en este proyecto.

- 1.- DESAFÍOS: PROMOVER LA SALIDA DEL MERCADO DE AQUELLAS SUBSTANCIAS DAÑINAS A LA SALUD HUMANA, ANIMAL Y AMBIENTAL.
 - 2.- PROBLEMAS: ELIMINACIÓN DE SUBSTANCIAS PELIGROSAS EN PRODUCTOS DE CONSUMO DE USO COMÚN.
 - 3.- ESTRATEGIAS: ORGANIZACIÓN DE UNA RED FIJA DE MONITOREO PERMANENTE A NIVEL LOCAL, NACIONAL Y REGIONAL PARA LA IDENTIFICACIÓN DE FACTORES DE RIESGO PARA LA SALUD HUMANA, ANIMAL Y AMBIENTAL.
-

Q6

4. Proporcione cualquier comentario adicional que desee compartir con nosotros en torno al proyecto.

- 1.- IDENTIFICACIÓN DE SUBSTANCIAS DE RIESGO:
 - A).- AGRICULTURA: USO INDISCRIMINADO DE PRODUCTOS QUE CONTIENEN GLIFOSATO, NITRATOS Y NITRITOS Y PESTICIDAS QUE CONTENGAN FLUOROCORCARBONOS EN HIDROFLUOROCARBONOS.
 - B).- GANADERÍA: USO DE SUBSTANCIAS PROHIBIDAS COMO CLEMBUTEROL, RESTRICCIÓN DEL USO DE IVERMECTINAS.
 - C).- INDUSTRIA ALIMENTICIA: RESTRICCIÓN DEL USO DE BENZOATO DE SODIO COMO CONSERVADOR, USO DE NITRATOS Y NITRITOS EN EMBUTIDOS, RESTRICCIÓN DEL USO DE ASPARTAME COMO SABORIZANTE Y EDULCORANTE.
 - D).- PRODUCTOS AEROSOLE: RESTRICCIÓN DE LA PRODUCCIÓN DE AEROSOLE LOS CUALES TIENEN EFECTO DEGRADANTE SOBRE LA CAPA DE OZONO.
-

#1

COMPLETE

Collector: Embedded Survey 1 (Website Survey)
Started: Friday, April 01, 2022 9:51:08 AM
Last Modified: Friday, April 01, 2022 10:35:05 AM
Time Spent: 00:43:57
IP Address: 184.144.237.184

Page 1

Q1

Renseignements individuels :

Nom : Miguelly Bélanger
Organisation : citoyenne
Adresse de courriel : miguelly_27@hotmail.com
Pays : Canada

Q2 Jeunes (jusqu'à l'âge de 30 ans)

Secteur :

Q3

1. Pensez-vous que votre organisation ou votre institution pourrait contribuer aux activités de ce projet, par exemple en partageant de l'information, en participant à un atelier, à une consultation ou encore, à un projet pilote? Dans l'affirmative, veuillez nous expliquer en quoi pourrait consister votre participation ou votre contribution à ces activités.

Pas encore, puisque pour l'instant cette initiative est personnelle, mais je compte m'impliquer dans des OBNL régionales en tant que biologiste et bénévole pour contribuer à ces enjeux.

Q4

2. Avec quelles autres organisations ou institutions pensez-vous que nous devrions collaborer durant la mise en œuvre du projet?

Le gouvernement (MAPAQ et MELCC), l'Union des producteurs agricoles (UPA), des OBNL comme VigilanceOGM, Quebec Vert, le Conseil régional en environnement et développement durable (CREDD), les Organisme de bassin versant (OBV), Agri-réseaux, SAgE pesticide et plus encore

Q5

3. Dans le cadre de ce projet, estimez-vous que nous devrions tenir compte de certains défis ou enjeux, ou de certaines approches ayant trait à la transparence dans la chaîne d'approvisionnement au sujet des substances chimiques que renferment les produits?

Oui, des enjeux comme l'étiquetage et les fiches signalétiques, la vente libre, une liste de produits autorisés remplaçant une liste de produits interdits puisque cela favorise l'industrie chimique, une révision des lois canadiennes concernant les produits chimique

Q6

Respondent skipped this question

4. Veuillez ne pas hésiter à nous faire part de tout autre commentaire à propos du projet.

Annexe 2 - Organisations avec lesquelles la CCE pourrait collaborer durant la mise en œuvre du projet

Organisation et intervenants
A.C. ETUMAJAC
Agri-réseaux
Agroquímicos-plaguicidas
American Chemistry Council (ACC)
Asociación Nacional de Fabricantes de Pinturas y Tintas (ANAFAPyT)
Asociación Nacional de la Industria Química A.C. (ANIQ)
Association pour la santé environnementale du Québec
Association pulmonaire du Nouveau-Brunswick
Associations commerciales
Breast Cancer Prevention Partners
CINVESTAV-IPN (Departamento de Toxicología)
Clean Production Action
Conseil régional en environnement et développement durable (CREDD)
Consumer Product Safety Commission
David Fernando Huerta Colosia (consultant)
Département de la Défense des États-Unis
Environmental Working Group
EPA
EPA - Office of Pesticide Programs
Food and Drug Administration
Fournisseurs de services axés sur la transparence
Fronteras Comunes
Fundación para la Conservación del Río Conchos, A.C.
Gouvernement (MAPAQ et MELCC)
Gouvernements étatiques (p. ex. de la Californie, de New York et de Washington)
Health Product Declaration Collaborative
Household & Commercial Products Association (HCPA)
ICF
Industria privada particularmente con manejo de sustancias químicas y materiales peligrosos
Industries de la gestion des déchets et du recyclage
Inoqua Soluciones
Institut national sur l'écologie et les changements climatiques (INECC - Mexique)
Instituto Nacional de Salud Pública (diversas áreas)
International Material Data System
Interstate Chemicals Clearinghouse (IC2)
Julimes
Lowell Center for Sustainable Production - UMass Lowell
Northeast Waste Management Officials' Association
Occupational Safety and Health Administration
Organisations non gouvernementales
Organismes de bassin versant (OBV)

Organismes gouvernementaux
Organismos gremiales y empresariales
Organización Panamericana de la Salud
Personal Care Products Council
Pharos
Por un San Borjas mejor
Principales associations commerciales faisant partie de la chaîne de valeur
Productos electrónicos CANIETI
Québec Vert
Réseau canadien pour la santé humaine et l'environnement
Responsible Purchasing Network
SAGe Pesticides
SciVera
Secretaria De Agricultura, Ganadería, Pesca Y Alimentación (Sagarpa)
Secretaria De Salud
Secretarías de Economía y dependencias de control aduanal
Sustainable Purchasing Leadership Council et Product Stewardship Society
TCO Development
Toxic Free Future
ToxNot
Toxservices
Travaux de l'organisme Women Voices for the Earth à propos des politiques axées sur la transparence
UL (Underwriters Laboratories)
Union des producteurs agricoles (UPA)
Uniones Ganaderas De México
Universidad Autónoma De San Luis Potosí, Facultad De Medicina
Universidad Autónoma De Zacatecas
Vigilance OGM