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David Backström
Manager – Policy Fuels and Downstream Operations
Oil, Gas and Alternative Energy Division
Environment and Climate Change Canada

Via email: David.Backstrom@canada.ca

Re: Comments on the Proposed Regulations for the Reduction in the Release of Volatile Organic Compounds (Storage and Loading of Volatile Petroleum Liquids)

On behalf of Canadian Manufacturers & Exporters (CME) and our member companies from across Canada, we are pleased to provide our comments with you on the Proposed Regulations for the Reduction in the Release of Volatile Organic Compounds.

The manufacturing sector is a key pillar of Canada's economy, playing a crucial role in creating jobs, fostering innovation, and driving economic growth. The nation's 90,000 manufacturers directly generate 10 per cent of Canada's real gross domestic product (GDP), make up one-quarter of its business research and development spending, and account for 60 per cent of the country's outbound goods. Taken together, the sector's direct, indirect and induced impacts amount to 27.5 per cent of Canada's total economic activity. In addition, by employing 1.79 million Canadians and supporting 3.43 million more jobs through supply chain activity and employee spending, the manufacturing industry undoubtedly makes substantial contributions to all communities across Canada.

Canadian manufacturers are fully committed to creating a clean and healthy environment for all. We believe that industry can and should produce goods in the most environmentally friendly manner while meeting the highest global standards. CME strongly believes in improving the air quality and health of Canadians and welcome the efforts of the Government of Canada to incorporate these aspects with regards to limiting the release of volatile organic compounds. In order to make these regulations pertinent, feasible, and beneficial for Canadians, the CME proposes the following recommendations:

Timelines for Implementation

1. Imposing a longer timeframe for implementation will allow for sufficient adjustment time as well as more flexibility to undergo necessary testing and schedule upgrades where required.
2. Environment and Climate Change Canada (ECCC) should utilize risk-based timelines that are coordinated and focused on a priority basis and are feasible for industry to achieve.

3. Repair timelines should account for procurement schedules and alterations to upstream logistics if a defect is identified.
4. These regulations should further consider the use of interim orders to provide clarity for impacted industries.

Inspection Procedures

1. To limit health and safety challenges for industry personnel, consider reducing the frequency of visual inspections and LEL testing to a quarterly basis.
2. The visual inspection requirement should be limited to floating roof tanks that do not vent to a vapor control system.
3. Additionally, ECCC could insert language that states that a visual inspection be performed while the LEL test is being performed, only if the risk level warrants one.

Overarching Considerations

1. Ensure that the regulations are wholistic in their approach, noting the economic challenges of decarbonisation the manufacturing sector and the capital investments it requires.
2. In addition to capital funding constraints, the labour market is anticipated to pose a challenge given the number of potential major projects that could be implemented concurrently in a dense timeframe.

Thank you for the opportunity to comment. As representatives of 1.8 million Canadians and 10 per cent of Canada's total economic activity, CME would be pleased to meet with you along with our member companies to provide our support, ideas, and insights as you review the proposed regulations. Please do not hesitate to contact us if we can be of further assistance on this or any other issue.

Sincerely,

Haroun Mansuar

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Environment and Energy Manager, National Policy
Canadian Manufacturers & Exporters