



Information Regarding the Pollution Prevention Planning Notice with Respect to Bisphenol A in Industrial Effluents [P2BPA Notice]

Where do we find bisphenol A?

Bisphenol A (BPA) is an industrial chemical used to make hard, clear plastic such as polycarbonates. Polycarbonate can be used to make many consumer products, including automotive components, appliances, water bottles, electronic equipment and medical equipment.

BPA is also used in the production of epoxy resins, which can be used to make protective coatings for cans and water pipes or to make composite structural coatings, adhesives, sealants, etc.

Other applications of BPA may include its use as a filler in investment casting, as a tire and brake fluid additive, and as a colour developer in thermal paper.

Why do we need to manage BPA?

Environment Canada and Health Canada have concluded that BPA may be harmful to human health and the environment at current levels of exposure. Due to its persistence in sediment and the fact that BPA is acutely toxic to aquatic organisms and is an endocrine disruptor, it was determined that releases of BPA to water are the main source of concern for the environment.

In order to manage the environmental risk posed by BPA, Environment Canada has developed a Pollution Prevention (P2) Planning Notice that requires industrial facilities subject to the notice to adopt pollution prevention practices. These practices must be developed to meet the Risk Management Objective, which is to achieve and maintain the lowest total concentration of BPA feasible that is less than 1.75 µg/L in effluent.

Who is subject to the P2BPA Notice?

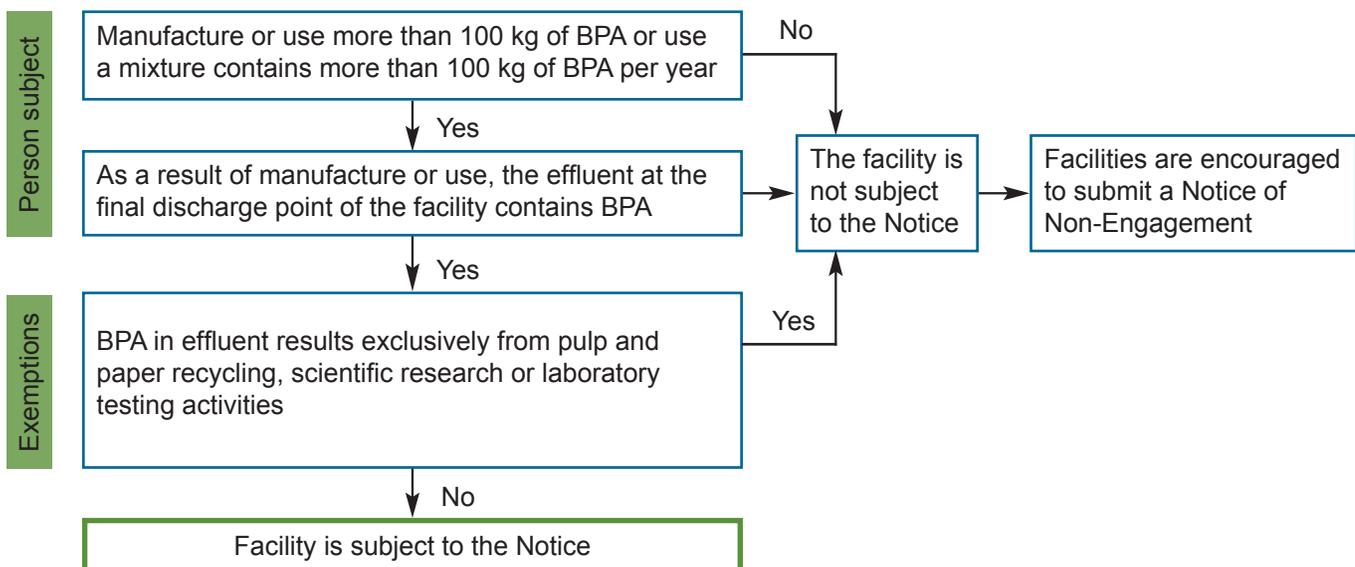
The P2BPA Notice applies to any person who owns or operates an industrial facility that during the calendar year meets any of the following criteria:

- a. manufactures BPA in a quantity greater than 100 kg and, as a result of manufacture, the effluent at the final discharge point of the facility contains BPA;
- b. uses BPA in a quantity greater than 100 kg and, as a result of use, the effluent at the final discharge point of the facility contains BPA; or
- c. uses a mixture containing BPA in a quantity greater than 100 kg and, as a result of use, the effluent at the final discharge point of the facility contains BPA.

There are some exemptions.

The Notice does not apply to any person who releases an effluent containing BPA resulting exclusively from pulp and paper recycling, scientific research or laboratory testing.

How to determine if you are subject to the Notice?



What are the requirements of the P2BPA Notice?

A P2BPA Planning Notice is a legal instrument issued under the authority of the *Canadian Environmental Protection Act, 1999* (CEPA 1999). It requires industrial facilities subject to the Notice to develop and implement P2 Plans and to report on progress achieved through the submission of declarations and interim progress reports within specific timelines.

How to report?

If you are subject to the P2BPA Notice, you must complete the required forms (schedules). These forms can be filled out online, using the P2 Planning Online Reporting Tool available at www.ec.gc.ca/planp2-p2plan.

To obtain the paper format of the schedules, you must send a request to LCPEPlansP2-CEPAP2Plans@ec.gc.ca. The paper schedules must be sent to the Innovative Measures Section of Environment Canada at:

Innovative Measures Section
Environment Canada
351 St. Joseph Boulevard
Gatineau QC K1A 0H3
Telephone: 819-994-0186
Fax: 819-953-7970
Email: LCPEPlansP2-CEPAP2Plans@ec.gc.ca

Important dates

The P2BPA Notice was published in the *Canada Gazette* and came into force on April 14, 2012. Outlined below are the key milestones for the preparation and implementation of the P2 Plan for BPA.

Instrument milestones	Deadline for person subject at the date of publication	Deadline for person subject after the date of publication
Preparation of the Plan	December 31, 2012	6 months after becoming subject
Declaration of Preparation (Schedule 1)	January 31, 2013	7 months after becoming subject
Interim Progress Report 1	January 31, 2014	Not applicable
Interim Progress Report 2	January 31, 2015	Not applicable
Risk Management Objective – achieved	December 31, 2015	12 months after becoming subject
Interim Progress Report 3	January 31, 2016	Not applicable
Monitoring	January–December 2016	One year after meeting the Risk Management Objective
Implementation of the Plan	December 31, 2016	24 months after becoming subject
Declaration of Implementation (Schedule 5)	January 31, 2017	25 months after becoming subject

Note: If a time extension is granted for more than one year, an Interim Progress Report is required each year until the facility's P2 Plan has been implemented.

If the Notice does not apply to you, send a Notification of Non-Engagement Form to Environment Canada. The form can be obtained from the P2BPA Notice Web page at www.ec.gc.ca/planp2-p2plan/default.asp?lang=En&n=6A389B0B-1.

Specific questions regarding the P2BPA Notice should be directed to the Products Division of Environment Canada by telephone at 819-953-3132 or by email to Products.Produits@ec.gc.ca (please type "P2BPA" in the subject of the email).

Disclaimer:

This document is issued for guidance on the *Notice requiring the preparation and implementation of pollution prevention plans with respect to bisphenol A in industrial effluents* (P2BPA Notice), and is intended to be complementary to the P2BPA Notice. If there is any discrepancy between the information contained in this document and the *Canadian Environmental Protection Act, 1999* (Act) or the P2BPA Notice, the Act and the P2BPA Notice will prevail.

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