

ONTARIO TOXICS REDUCTION ACT

Ontario's Toxics Reduction Act (TRA) came into effect January 1st, 2010. This regulation requires thousands of Ontario manufacturers to report to the Ministry of the Environment (MOE).

Oakhill's qualified and experienced team can help with:

- Reporting;
- Customized compliance programs;
- Show you potential cost savings; and
- Environmental benefits.

Toxics Reduction Act, O. Reg. 455/09 Designed to Reduce Front-End Toxic Substances:

The TRA requires many Ontario manufacturers to prepare and publish certified toxic substance reduction plans. The MOE's goal is to reduce the creation, use, release and/or off-site transfer of toxic substances and to encourage greener alternatives, including new technologies.

The TRA focuses on reducing the front-end production of toxic substances in the manufacturing process: it's designed for pollution control, not prevention. It's anticipated that approximately 2,000 Ontario companies must now account for any toxic chemicals manufactured, processed or otherwise used at their facilities.

Specifically, TRA Regulations Require Companies to:

- Track and quantify the toxic substances they use, create and release;
- Develop plans, including options to reduce their use of toxic substances;
- Make summaries of their plans available to the public; and
- Report to the Ministry on their annual progress in reducing toxic substances and make certain information available to the public.

What is a Toxic Substance?

A toxic substance is one that has the potential to cause harm to living organisms. For the purpose of the TRA, this includes all substances in Schedule 1 of the National Pollutant Release Inventory Notice (NPRI Notice) (Parts 1 to 5) plus Acetone. A complete listing is available at:

<https://ec.gc.ca/inrp-npri/default.asp?lang=En&n=36BE226E-1>

TRA Affects All Facilities Identified by NAICS Codes 31, 32, 33 and 212

The list of included raw material and manufactured products is very broad and mirrors the NPRI list. It ranges from food and beverages to chemicals, pharmaceuticals, metals, woods, resins, plastics, coatings, non-metallic minerals, transportation equipment and parts and many others.

Applicable legislations:

Environmental Compliance Approval are required by Section 9 of the [Ontario Environmental Protection Act](#).

O. Reg 419 (Air Pollution - Local Air Quality).

Related Documents:

- Oak-04: NPRI

If you report to the NPRI, chances are that you will have to report to the TRA. If the NPRI reporting thresholds are met, the owner/operator of the facility - and this includes companies with as few as 10 employees - must prepare a Toxics Substance Reduction Plan certified by the an accredited Toxics Reduction Planer as well as the facility's highest ranking employee with management responsibilities.

If you aren't sure of your NAICS (North American Industry Classification System) code you can access a full listing at <http://www.statcan.gc.ca/subjects-sujets/standard-norme/naics-scian/2007/list-liste-eng.htm>

The TRA So Far...

TRA has been implemented through the last few years in stages. The current requirements are ...

- For toxic substances labeled as "priority" in the TRA, a report was due June 1, 2011, for the calendar year 2010.
- Facilities must have developed their toxic substance reduction plan by December 31, 2011.
- Summaries of the plan should be made available to the public.
- For toxic substances NOT labeled as "priority" in the TRA, a report was due June 1, 2013, for the calendar year 2012.
- Summaries of the plan must be made available to the MOE and the public by December 31, 2013.

Not Just Another Reporting Chore: Environmental and Bottom-Line Benefits are Achievable

Beyond the obvious benefits of toxic substance reduction that include reduced worker, consumer and environmental exposure to toxics, there are a number of potential bottom line savings, including:

- Lower material feed costs;
- Lower waste disposal costs; and
- Potential increased sales because of consumer "green" demand.

The TRA will also force many companies to perform an in-depth analysis of their processes, asking vital questions such as: "*Can we do it in another way?*", "*Can we afford another way?*". Given the detailed process characterization and reporting requirements for these questions in demand, many companies will need help in becoming compliant. Oakhill's experienced team of professional engineers and technologists can help you to become TRA compliant - and use the TRA to your bottom-line benefit.

We have the experience, qualifications and resources to help you become compliant - and move beyond into achieving significant environmental and financial savings.

Call Oakhill for a free no obligation quote.