

GRAIN GROWERS
OF CANADA



LES PRODUCTEURS
DE GRAINS DU CANADA

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Members:

Alberta Barley
Commission

Alberta Grain
Commission

Alberta Oat Rye &
Triticale Association

Alberta Pulse Growers

Alberta Winter Wheat
Producers Commission

Atlantic Grains Council

British Columbia Grain
Producers Association

Canadian Canola
Growers Association

Manitoba Corn Growers
Association

Oat and Barley Council
of Ontario

Prairie Oat Growers
Association

Western Barley
Growers Association

Western Canadian
Wheat Growers
Association

November 6, 2009

Honourable John Gerretsen
Minister of the Environment
12th Floor, 135 St. Clair Ave. W
Toronto, ON M4V 1P5

Dear Hon. Gerretsen,

**Re: EBR Registry Number: 010-7792
Draft Regulation made under the Toxics Reduction Act, 2009**

The Grain Growers of Canada has carefully reviewed the Canadian Oilseed Processors Association's letter dated November 2nd, 2009 on the above proposed regulation.

We concur that the adoption of the entire National Pollutant Release Inventory (NPRI) as a list of "toxic" substances is inappropriate as it is a list of pollutants, not "toxins".

It is our understanding that Environment Canada maintains a specific list of toxic substances (*i.e.*, Schedule 1 of the Canadian Environmental Protection Act) and further that this is a living document to ensure current risk mitigation is in place.

There is a disconnect between the lists in Environment Canada and NPRI because they are simply designed to track different substances and different risks.

Decisions for issues like this must be based on sound science. In the absence of sound science we risk both driving up the costs of value added processing in agriculture while at the same time not increasing food safety.

Agriculture and agrifood are key drivers in the Canadian and Ontario economies and have been one of the bright spots in the recent downturn. To impose unsubstantiated regulations and costs will mean either prices have to decrease at the farm gate for the raw products we grow, or prices to consumers have to increase.

We strongly encourage you to exempt food and feed processing facilities from this regulation. We would be pleased to discuss this further with you or your Department at any time.

Respectfully,

Doug Robertson
President
Grain Growers of Canada

CC: Hon Leona Dombrowsky