

## **SEHSC Response to Canadian Order Adding D<sub>4</sub> to Schedule 1 of the Canadian Environmental Protection Act, 1999**

**March 7, 2011**

SEHSC does not believe that the Final Order published by the Canadian Government adding D<sub>4</sub> (octamethylcyclotetrasiloxane) to Schedule 1 of the Canadian Environmental Protection Act, 1999, is consistent with the available scientific information. The Final Order is not based on any concerns for human health, nor is there a finding that D<sub>4</sub> is bioaccumulative in the environment. Canada maintains its decision is based solely on the basis of a perceived concern that quantities estimated to be released to the environment are above levels expected to cause harm to organisms, which is not true.

The available international monitoring data from the US, Canada, and Europe indicate that levels of D<sub>4</sub> released into the environment are sufficiently low such that no ecological harm can be reasonably expected. In fact, the data indicate that D<sub>4</sub> concentrations measured from Canadian wastewater treatment plant influent and effluent already meet the risk management objectives identified by Environment Canada in its proposal to regulate D<sub>4</sub>. Consequently, D<sub>4</sub> has not been measured in Canadian surface waters at sufficient levels to warrant regulatory restrictions.

Accordingly, SEHSC maintains that D<sub>4</sub> does not warrant listing on Schedule 1 and that any significant restriction will provide no measurable environmental benefit while creating unnecessary burden and expense for consumers, retailers, manufacturers, and distributors. In addition, the Order could have the added effect of causing some Canadian D<sub>4</sub> users to relocate their business to places where there are no regulatory restrictions for D<sub>4</sub>, with an associated loss of Canadian jobs and innovation, without any measureable environmental benefit.

For more information, please visit [www.sehsc.com](http://www.sehsc.com), or contact—

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