



Contact: Jessica Clary • jclary@ilma.org • 703-684-5574

Independent Lubricant Manufacturers Association

Press Release

## **ILMA Submits Comments to Canadian Minister of Environment on Chlorinated Paraffins**

ALEXANDRIA, VA (February 24, 2009) — Last week, ILMA submitted comments to Environment Canada (EC) on its recent, proposed actions on Chlorinated Paraffins (CPs). ILMA stated that the comments submitted by the Chlorinated Paraffins Industry Association (CPIA) raised significant technical concerns that must be addressed prior to EC taking actions on CPs, and that EC's consideration of a "prohibition regulation" seems inappropriate and unnecessarily damaging to Canadian businesses. CPs are used in lubricant products, especially metalworking fluids.

EC's Sept. 4, 2008 notice regarding the Proposed Order to add CPs to the List of Toxic Substances in Schedule 1 of the Canadian Environmental Protection Act (CEPA), 1999 was met with a Notice of Objection submitted by CPIA. CPIA requested, pursuant to section 333 of CEPA, that the agency convene a Board of Review before proceeding.

ILMA agrees with CPIA that "an objective review of the data on CPs is critical to evaluating whether the conclusions drawn from the risk assessment are supportable from the data presented." ILMA commented that, upon reviewing the situation, "it does not appear that Canada has adequately shown that CPs pose a danger to human health or that they are having an effect on the environment.

EC indicates in its August 2008 Proposed Risk Management approach that it is considering regulations that "would prohibit the manufacture, use, import, sale and offer for sale of CPs." The document further states that "specific use exceptions for some CPs may (emphasis added) be allowed where it can be demonstrated that alternatives are not technically or economically feasible."

In response, ILMA explained:

"Given the already extremely low levels of these substances in the environment, limited emissions of these substances, and the uncertainty in the risk assessment, such proposed action seems inappropriate and unnecessarily damaging to Canadian businesses attempting to manage products in an environmentally-sensitive manner."

ILMA stated that it is prepared to work with EC, ILMA Members with Canadian facilities, CPIA and others to develop "a reasonable, cost-effective risk management approach for lubricant products containing CPs," and explained that "such an approach will provide environmental benefits beyond simply replacing CPs with other additives." ILMA also added that, if EC maintains the "no-measurable release" approach, an appropriate analytical method must be established so ILMA members can assess their operations accurately.

The full text of the letter is available on ILMA's website.

# # # # # # # # #

The Independent Lubricant Manufacturers Association (ILMA) was founded in 1948. ILMA's 300 members include independent lubricant companies that produce more than 25% of all lubricants and 80% or more of the metalworking fluids and other specialty industrial lubricants sold in the U.S., and key suppliers of raw materials and services to independent lubricant manufacturers.