



Canadian Paint
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Association

Association canadienne
de l'industrie de la peinture
et du revêtement

IN SIGHT PERSPECTIVES

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Innovation. Chemistry. Compliance.

A Formulation for Success

The paint and coatings industry is one of the most heavily regulated chemical industries in Canada. CPCA's mandate is to advocate for fair regulatory development that is evidence-based, rooted in science, with full consideration of the impacts on **industry**, the **environment**, and the **economy**.

INSIGHT — is Canada's trusted source for 'insights' on regulatory compliance and ongoing regulatory development impacting the Coatings, Adhesives, Sealants and Elastomers (CASE) industry. The publication addresses regulatory changes over the past year and the many proposed regulations the industry is facing, now and over the next 3 to 4 years as the regulations are finalized. Some of these include:

- 1000+ substances prioritized for assessment under CMP
- Proposed lower VOC limits in 49 categories of AIM coatings
- Lower VOC limits proposed for Industrial, Commercial Adhesives & Sealants and also Auto Refinishing
- Impacts of recent biocide cancellations and use restrictions
- New regulatory initiatives assessing 4,700 PFAS chemicals and up to 10,000+ in the coming years
- Proposed regulations for increased labelling of chemicals in consumer products
- New initiatives to increase supply chain transparency and 'more' labelling
- Proposed use of recycled content in plastic packaging, containers, and equipment

INSIGHT provides a glimpse into CPCA's work on behalf of the CASE industry in Canada, all of which is focused on achieving the best possible outcomes for the entire industry. **However, CPCA membership excludes a number of manufacturers and suppliers who rely heavily on fair regulations for many chemicals in commerce.** Given the huge volume and severity of the currently proposed regulations CPCA will reach out to all those impacted to

ensure a much stronger, **'whole of industry'** approach to the regulatory challenges now before the sector in Canada. These will be much more challenging because they seek to remove or reduce the level of critical active ingredients necessary for functional CASE products.

In addition to what's in the regulatory pipeline for chemical regulations in the year or two ahead, INSIGHT also features several articles on subjects of interest to the industry:

1. Implementing new regulatory changes under the CMP for thousands of chemicals in commerce;
2. Lowering VOC limits in three main coatings categories;
3. Introduction of risk assessment for thousands more PFAS chemicals; and
4. The need for an 'all of industry approach' to ensure positive outcomes. The future of the industry depends on the outcome of these very significant challenges.

The question companies must answer in the CASE industry in Canada are:

- How much more restrictive will the proposed regulations be?
- Will there be more outright bans?
- Which products will be impacted by the new use restrictions?

The bottom-line question is: How will the final decisions on the above change the CASE industry in Canada vis-à-vis manufacturing, innovation, increasing costs and global trade?

Working **together** the industry **can** impact the answers to those questions!





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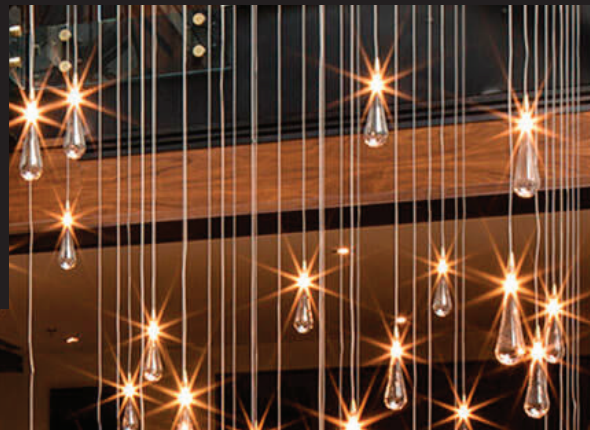


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“ I came into my office today to find the recent *INSIGHT* magazine on my desk and it is **EXCELLENT!** Great articles and great writing, you and your team are a tremendous asset to the industry.

Joyce Borkhoff, Vice President,
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INSIGHT PERSPECTIVES

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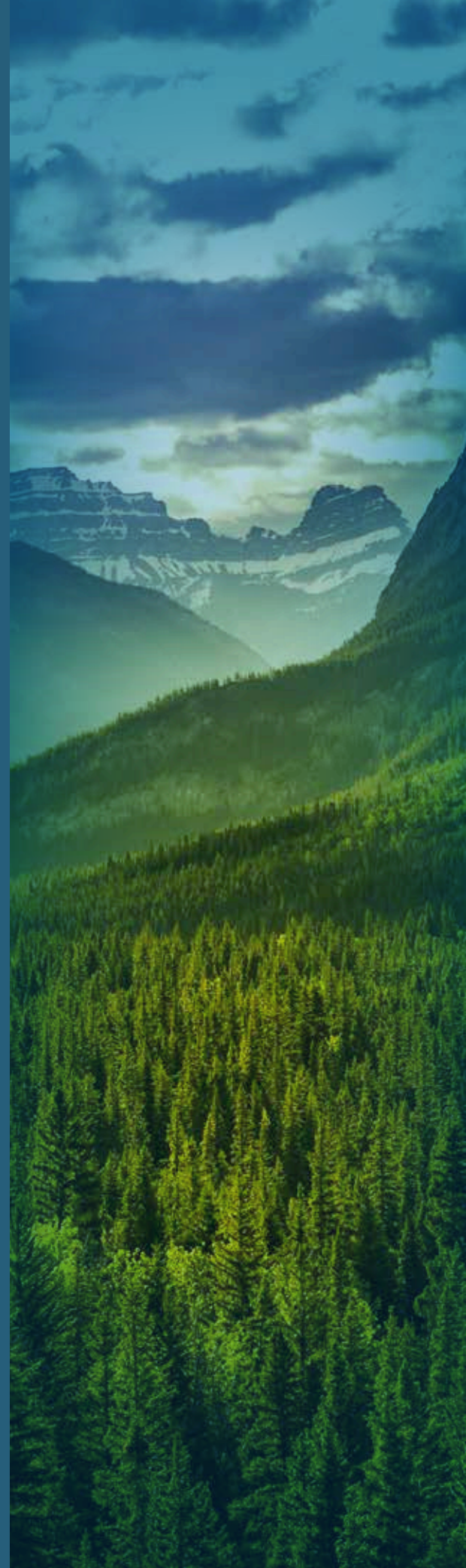
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CPCA's Board of Directors

Focused. Engaged. Committed.

Imagine a world without colour and without the means to **protect, preserve**, and **extend the lifecycle** of our most valued assets, critical infrastructure, and products we use daily? Together with members, industry stakeholders and regulatory bodies, CPCA's Board of Directors works to **support a strong, vibrant and thriving Canadian coatings industry** while supporting industry's efforts to **address the world's toughest sustainability challenges**.

CPCA's Board of Directors is comprised of industry's leading coatings manufacturers, suppliers and distributors. Their knowledge is invaluable in the governance of CPCA and in helping shape the future of the Canadian Coatings Industry.

CPCA Strategic Plan 2023 — 2026 Approved by the Board

The Board of Directors identified and approved key priorities for the strategic plan and defined the four pillars of success for each of them.

- 1 **Product Stewardship & Sustainability**
- 2 **Policy & Regulatory Affairs**
- 3 **Advocacy & Communications**
- 4 **Organizational Excellence**

Key Initiative 1
Achieve fair, competitive, and science-based policies for regulatory oversight.

Key Initiative 2
Work with members to build consensus on policies and regulatory issues impacting the sector.

Key Initiative 3
Work proactively to make a strong case for changes to policy and regulations that will improve competitiveness, while ensuring products are safe for use based on sound, scientific assessment.

Key Initiative 4
Achieve further recognition of the coatings industry as an essential sector and leader in achieving new heights in product stewardship regulations and sustainability overall.

Key Initiative 5
Be widely recognized as a leader in more sustainable product innovation and increased contributions to achieving specific CASE-related ESG Goals.

Chair's Message

Darrin Noble, President & COO
Cloverdale Paint

“ *There has never been a more important time for the work done by CPCA on behalf of the industry and never a more important time for all companies in the CASE industry in Canada to join with us to make the case for reasonable regulations over the long term.* ”

With another year under our belt, the industry in Canada has held its own as we see members focus on their respective businesses more than ever. Some have made investments in operations including an increased focus on R&D and innovation, while others added new facilities, staff, or product lines. Whatever the case, Canadian companies continue to deliver highly performing products for their customers. Despite the ongoing challenges in supply chains, inflationary pressures, and higher costs of borrowing, the industry remains strong. However, we face mounting regulatory challenges that can't be managed by individual companies alone. Our members have been most supportive of the Association's work over the past year with ever increasing legislative and regulatory changes on the road to net zero. **Our industry continues to support sustainability initiatives with increasing commitment to ESG goals where applicable.**

In recent months our industry has also seen more regulatory change over the past two years than at any time in history. Industry understands that changes may be needed, however some have suggested the amount of change is more than double the previous several years. The level and pace of regulatory change will likely lead to more bans and use

restrictions for chemical inputs in our products. The big question for the Board, CPCA staff and technical committees is how much change can be reasonably managed and can the industry technically make those changes and still deliver products customers demand? Our customers rely on those products to extend the lifecycle of their valuable assets, which includes public and private infrastructure in multiple industry sectors. For that, products need to be highly functional. Many of our products are designed to extend asset life by protecting against the natural impacts on the environment hence reducing the need for harvesting more non-renewable resources like wood, metals and other raw materials used in construction. Taxpayers pay for public infrastructure and the more often that infrastructure is replaced or upgraded the more it will inflate costs and slow sustainability gains.

There has never been a more important time for the work done by CPCA on behalf of the industry in Canada. That work positively impacts finished goods as well as imported and domestic raw materials. **It is an important time for all companies in the CASE industry in Canada to join with us to raise our voice for reasonable regulations over the long term.** We will never argue against the need for regulation



to ensure safe products for our workers and customers, but on behalf of industry we must be clear on the need for evidence-based regulations that our sector can meet. It helps no one, neither government nor industry, if we cannot protect our assets to ensure a strong, affordable and growing economy.

As part of the Board's ongoing efforts on sound governance, in 2023 CPCA engaged a professional governance facilitator to develop a Strategic Plan for the next several years to 2026, as we do every three years. We believe that the priorities and goals set out in that plan will help the Association continue to effectively deal with the challenges before our industry and help us make reasonable contributions to both members and the economy.

I am also pleased to say that an independent Membership Survey conducted in 2023 produced informative insight, while also revealing where the Association might improve. There were positive views with **97% of members stating they would recommend the Association to another organization, scoring an overall average of 4.2 out of 5 on member satisfaction.** While there were very positive responses on the strength of the substantive information provided members via the Regulatory RADAR, Prime Time News, bulletins and Canada CoatingsHUB data and

related notifications, etc. there were suggestions on how to streamline information flow to better inform members on the receiving end. That work is already in progress.

I would like to thank the board members, staff, and technical committees — and members at large — for their support of the important work of the Association. More than ever, we need a **'whole of industry'** approach as the next few years will be critical in shaping the future of our industry. **I would call on those who have supported us for many years, and those who may wish to help in this worthy cause, to fully engage with CPCA. We need your support more than ever.**

Darrin Noble, CPCA Chair

President and COO
Cloverdale Paint



President's Message

Gary LeRoux, President & CEO
Canadian Paint and Coatings Association

This edition of Insight is slightly different than previous editions. The main reason is that while the CASE industry has been one of the most heavily regulated sectors in Canada over the past decade, it's nothing like it is today! For example, of the 4,300 substances prioritized for **Chemical Management** over the past 15+ years 1,552 are used in thousands of CASE products. As we know the risk assessment of those chemicals required significant resource commitment by member companies operating in and shipping products to Canada. The CMP is now ramping up prioritization of chemicals with several thousand more to be assessed over the next four years with 1,000 already prioritized.

More recently, the federal Government announced the risk assessment of 4,700 PFAS substances in the coming years and that too will be a burden on industry in terms of responding to calls for data and extensive engagement. Recent amendments to the *Canadian Environmental Protection Act* (CEPA, 1999) in June 2023, now called *Strengthening Environmental Protection for a Healthier Canada Act*, could drastically change the way chemicals are assessed for years to come. It's safe to say there will be 'more' administrative burden not less. The federal Government is now engaged with stakeholders on putting those amendments into action and consulting widely with stakeholders until June 2025 to lock down the new provisions in the Act. **All of industry must be at the table!**

The way deliberations play out over the next two years will impact every company in the chemical sector in Canada, some more than others. One can bet on the CASE industry being at the top of the list of tougher chemical assessment. While the CASE industry has had good success over the past 15 years in complying with the requirements

related to risk assessing and risk managing thousands of implicated products in commerce, **the approach to these regulations are now being reset by the federal Government.** It has essentially doubled the workload of CPCA and member companies. More importantly, it will be more difficult for the CASE industry to keep highly functioning products in commerce, products used by companies in multiple industry sectors. In many cases these products help reduce 'their' environmental footprint.

Then there are challenges related to **Air Quality and Environment** with substantial regulations currently proposed for lower VOC limits. The federal Government is now moving forward on new VOC regulations in the CASE industry for Architectural and Industrial Maintenance, OEM and Automotive Refinishing as well as Industrial Commercial Adhesives & Sealants. CPCA has been consulting with Government on these new limits, some of which will be difficult to meet. The federal Government wants to adopt CARB AIM limits, which even many jurisdictions in California have yet to adopt, but now Canada is expected to meet them. Some of these will be especially challenging for exterior products, especially exterior products like stains. The CASE industry has achieved VOC reductions of more than 90% in architectural coatings amounting to more than 48 kilotonnes over the past 16 years. It will be hard to find more, but the industry is now being asked to find another 7 kilotonnes in that one category.

Then there are **Health and Safety** regulations for the classification of hazardous products with more regulations coming to increase transparency and labelling, ongoing GHS revisions, and new microplastics and plastics regulations. For some reason governments believe labelling is the



answer to everything, when most know that it is only one tool and likely not even the best in a digital age.

Then there are many challenges under the heading of **Product Stewardship**, and at the top is concerns related to biocides used in paint preservation. These have come under increasing scrutiny in the past number of years with critical antimicrobial ingredients being subject to more bans and cancellations. Biocides for paint and coatings have been cancelled and those not cancelled are subject to reduced limits that are effectively bans because they cannot deliver the same level of protection from biocontamination. This is especially the case for waterborne products and will be made worse if the proposed lower VOC limits become a reality in 2024. Some have argued that this will create cases of more contamination and increase negative health effects, not less. This is happening while the US has not banned the same active ingredients as Canada has with no plans to do so anytime soon. There is a clear contradiction in the Government wanting more sustainable water-based products, while restricting the active ingredients necessary for both in-can and film preservation.

Each year in this annual report to the membership, and industry more broadly, we provide a little more detail on the many regulations before our industry. This includes CPCA's work advocating on the proposed regulations for better outcomes. Some of these actions are briefly tracked in the **Advocacy Report** the board and members see updated on a regular basis, as they evolve so both understand how things are evolving and provide feedback when necessary. Proposed government actions take time to progress to final decisions allowing time for industry input before new regulations become law. **The CASE industry is now close to that point on so many issues.** CPCA members have made substantive submissions, engaged in countless

consultations, and provided copious amounts of information to improve regulatory outcomes in the sector. However, it appears that given the extra push for bans and/or lower limits we have seen to date, the next several years could be much different if the industry doesn't act soon.

To support the substantive regulatory work and other association goals identified by the Board in the **Strategic Plan 2023-2026**, CPCA is moving forward on several initiatives to improve member support. These initiatives include: updating CPCA's CoatingsTECH course offerings; enhancing CPCA's digital database, the CoatingsHUB; integration of AI support to enhance functionality for the digital database and produce more substantive technical submissions to Government; an improved marketing website; server and file tree upgrades for improved data file management; and rebranding CPCA highlighting industry's obvious success on product stewardship and sustainability to date.

CPCA now urges a **'whole of industry'** approach to ensure final decisions on multiple regulatory challenges are based on scientific evidence. Our industry has been strong in supporting the need for innovation in moving toward more sustainably sourced materials in their products. But the recent round of proposed regulations reveals even more challenges in the pipeline. Given the volume of changes, that will mean more reformulation in some cases to meet new limits or product lines taken off the shelf. Either way there will be change. There is still time for industry to have an impact on how much change, but not much time.

Gary LeRoux
President & CEO



Coatings are: Reliable Recyclable Sustainable



#coatingsaresustainable

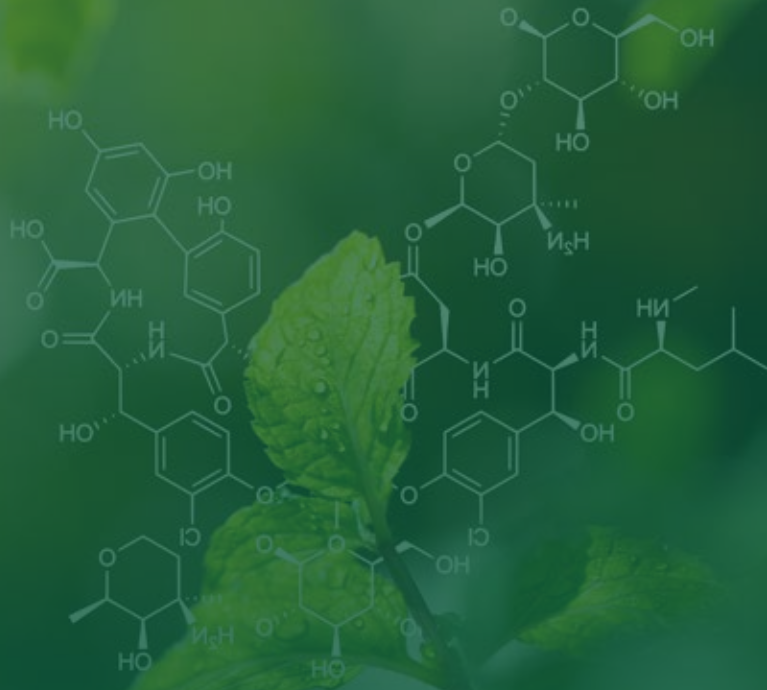
The Canadian coatings industry is committed to sustainability and creating measurable change. Sustainability starts in the lab is a statement that CPCA members take seriously. Chemical engineers work tirelessly to create product formulations that meet or exceed Canadian regulatory requirements, making products sold in Canada some of the safest, most reliable, and highly performing products on the market today.

One could say, the paint and coatings industry has been among the first contributors to sustainability because coatings have always **protected** and **preserved** the substrates to which they are applied. The very nature of coatings products is to serve as a barrier against degradation, rust, corrosion, and extend the lifecycle of assets through coatings technology. In industrial applications heat-refracting and ceramic coatings help conserve energy and maximize performance. These advanced coatings are applied to tools, biomedical equipment, or for thermal protection. Industry best practices include consideration of the full lifecycle of every product.

The coatings industry in Canada has fully funded all product stewardship initiatives for paint recycling since the 1990's with thousands of depots across Canada that serve as drop off points for empty paint

cans, or left-over paint that can be shared through Paint Share programs, for example. In addition to this, over the past 20-years the industry has made measurable strides on sustainability moving away from solvent-based formulations to water-based formulations in architectural and industrial paint. There have also been significant advances with the use of green chemistry which has been foundational to sourcing renewable materials and creating ecofriendly product offerings that are biodegradable, odour-free, and contain fewer harmful chemicals. Overall, it has significantly lowered the environmental impact versus paint and coatings of 10 and 20 years ago.

The environmental achievements of the CASE industry can be measured. Every year more than 20 million kilograms of paint are recycled in Canada, diverting waste from landfill and waterways.



Volatile Organic Compounds (VOC) have been reduced by 85% over the past 25 years, in architectural paints thanks to innovations in product formulations. This represents 48 kilotonnes of emissions reduction — the equivalent of taking 350,000 cars off the road. Most architectural paint is now almost exclusively water-based and generally represents more than 50% of all volume of paint and coatings sold in Canada. A significant percentage of water-based paint is also used in many commercial segments including heavy industrial and the automotive refinishing sector.

It's clear that while the coatings industry creates some of the most visibly innovative products that help elevate, sustain, and protect our environments, these solutions often remain invisible and go unnoticed. Take a moment to consider the far-reaching impacts coatings products have on our everyday lives. Every phone, computer, car, solar panel, and wind turbine has been coated. The kitchen faucet you use, even the couch you rest on or the rain coat you wear has been coated to protect from degradation, to preserve and extend the lifespan, and to provide the user with the best performance one should expect when purchasing

a product. **Preservation and protection are the very ideas underpinning the sustainability mantra of reduce, reuse, recycle.**

As the world grapples with increasing sustainability challenges, industry is on the front lines, formulating coatings products that will help to increase energy efficiencies, reduce greenhouse gas (GHG) emissions and fuel costs, preserve eco-systems, and protect, preserve, and provide valuable solutions. The World Coatings Council and 20 partner associations across the globe recently released the **Coatings Industry Global Sustainability Report**. This report highlights not only the ways in which the industry has been contributing to sustainable development since the Brundtland Report's definition of the 1980's but how the industry has aligned with the United Nation's Sustainability Development Goals (SDGs), where possible, and moving towards net-zero. To learn more about industry's many achievement visit :

<https://canpaint.com/sustainability/coatings-are-sustainable/>

2 ZERO HUNGER



3 GOOD HEALTH AND WELL-BEING



6 CLEAN WATER AND SANITATION



7 AFFORDABLE AND CLEAN ENERGY



8 DECENT WORK AND ECONOMIC GROWTH



9 INDUSTRY, INNOVATION AND INFRASTRUCTURE



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



13 CLIMATE ACTION



Economic Impact Numbers Matter

Canadian Coatings Industry Forecast 2024

The Canadian Coatings Industry creates \$19.3 billion dollars in Canadian economic impact annually.

Manufacturing

In Canada, CPCA members have more than 200 coatings, adhesive and sealant (CASE) manufacturing establishments, supply products to more than 5,000 retail stores and 8,000 auto body shops. This represents product shipments of \$3.8 billion in 2022 and annual direct and indirect sales of more than \$19.5 billion, employing directly and indirectly over 82,000 employees.

The paint and coatings industry includes a wide range of coatings, adhesives, sealants as well as elastomers, commonly referred to in the industry as CASE. CPCA members represent 85 percent of the volume in that industry in Canada. The coatings industry is a key driver of economic activity in Canada with substantial economic impacts generated directly, indirectly and induced. The industry is an important and dynamic part of the nation's economy with a pivotal role in protecting valuable assets and manufactured goods in use everyday. This includes coatings that extend the life of Canada's most critical infrastructure such as pipelines and bridges; protects a family's most valuable assets such as their homes and automobiles; and everyday items from chairs to cell phones. More than just the paint on walls and garage floors, there are many highly performing functional coatings that require extensive investment in technology, innovation and R&D. **All of this is delivered by an industry increasingly focused on product stewardship and sustainability.**

Economic Driver

The Canadian coatings industry is an **economic driver** with an annual economic impact of \$19.5 billion. Just about everything that is manufactured has a coating, adding value to every product made with enhancements related to aesthetics, performance and lifespan.

The coatings industry generates employment in excess of **82,000 jobs, which tend to be higher paying jobs than those in other industries.** Adding induced jobs the number exceeds 130,000, which shows paint and coatings products touch many end-use markets such as construction, automotive, oil & gas, mining, wood and metal products, aerospace, machinery, paper, metal containers, coil, transportation equipment and general industrial manufacturing.

Committed to R&D Investment

Paint and coatings continue to make massive investments in research and development (R&D) generating new technologies in product formulations. All have led to increasingly more functional coatings for residential, commercial and industrial segments. A strong coatings industry is critical to maintaining and improving Canada's overall economic performance as reflected in its **contribution to Canada's Gross Domestic Product (GDP) estimated at \$8.5 billion annually.**

Sustainable Coatings

CPCA members have made great strides in advancing sustainability across its many product segments. For example, it has lowered VOC emissions in 'architectural coatings' with 85 percent emissions reduction in Canada to date equalling 48 kilotonnes. Paint manufacturers also pay 100% of the costs of waste paint recycling in Canada with a program in every Province leading to approximately 20 million kilograms of paint recycled annually. Antifouling 'marine coatings' contain eco-efficiency benefits when applied to tankers, bulk cargo, and other vessel types reducing greenhouse gas and other emissions by an average of 9 percent leading to vast reductions in global shipping costs and an estimated 2–4 percent of total global greenhouse gas emissions. Cool 'roof coatings' enhance the ability of commercial buildings and homes to regulate temperature reducing energy usage and savings between 10 and 70 percent. 'Corrosion-resistant coatings' for water transport improves pipeline infrastructure for both potable and non-potable water. 'Automotive monocoat coating' technology results in more durable paint, use less energy and water and reduces CO₂ and particulate matter.

The corporate strategies of coatings companies by both manufacturers and suppliers are aligned with the coatings industry's long-standing commitment to worker and product safety, first evidenced in the principles of Coatings Care®. The industry is now embracing the **United Nations Sustainable Development Goals** of relevance to the coatings industry with more sustainable products that help other industry sectors extend the lifecycle of their assets and reduce 'their' environmental footprint.

Fair Regulations

The industry does not rely on government subsidies, but as one of the most highly regulated sectors in the economy it seeks to have a level playing field on which to compete. If there are to be regulations they must be appropriate regulations. Given the highly integrated nature of the North American economy, especially with the United States, the industry seeks greater alignment of regulations between the two countries to facilitate positive trade flows. This is especially important for Canada with close to half of the coatings used in Canada now imported from the United States. Despite some challenges in this regard the industry continues to deliver substantial economic impacts for Canada.

Economic Impact

Economic impacts are defined as changes to an economy because of a specific undertaking or activity. With those activities come benefits impacting the size and structure of an economy. This happens as goods and services are produced and purchased resulting in direct inflows of capital for construction of new facilities or delivery of new and better services.



Summary

Total economic impact of the paint, coatings, adhesives, and sealants (CASE) industry

Economic Output Annual direct and indirect economic output of \$19.5 billion		Shipments Paint & Coatings product shipments of \$3.7 billion in 2022, up 12 percent from 2021	
Employment Annual direct and indirect employment of 82,856	Wages Estimated total annual direct and indirect wages and salaries of \$4.93 billion	Salaries Average annual paint and coatings wages and salaries was \$51,860	
National Average Wages and salaries are 18 percent higher than the national average in Canada		Induced Employment Annual induced employment of 48,130	
Induced Wages Estimated annual total induced wages and salaries of \$2.2 billion	GDP Annual contribution to GDP of \$8.54 billion	Taxes Annual federal and provincial taxes generated is \$2.9 billion	
Leading Provinces Ontario and Quebec are the leading beneficiaries of the Canadian paint and coatings industry with an estimated 44 percent and 22 percent share of GDP as noted above, respectively.	Manufacturing Manufacturing and sales is the key driver of economic output, including adhesives and sealants , accounting for 30 percent of the overall economic output.	Raw Materials Raw material suppliers/ distributors, professional coatings contractors, and retail stores combined account for the remaining 70 percent of overall economic output .	

Canadian Paint and Coatings Forecast

Looking ahead to 2024

In 2023, Canadian decorative coatings sales trends saw a rise by 5.2 percent in values while the litreage sales trends dropped by -2.7 percent. Some industrial coatings sectors in Canada experienced negative litreage sales trends in the order of 1-7 percent such as the wood, coil, rigid can packaging, and general industrial. The Automotive OEM and Aerospace sectors had the most significant growth in value (respectively, +10.0% and +12.0%) and in litreage (respectively, +5.0% and +6.0%).

Despite housing starts being down 13 percent and home sales generally down 23 percent YTD, the forecast for sales growth for 2024 remain marginal but steady. See Table 1.0

In 2024, total paint and coatings value sales are expected to rise by 2.2 percent in Canada. Meanwhile, the volume of sales will also increase by 1.0 percent. The fastest coatings markets in terms of value (3.5-5.0%) and volume (2.5-3%)

will be Automotive OEM, Industrial Maintenance and Protective Coatings, and Marine coatings. See *Table 2.0*

As we look ahead to 2025, the forecast for total paint and coatings will increase by 3.3 percent in value and by 1.25 percent in volume. The fastest coatings markets

will be in Automotive OEM, Industrial Maintenance and Protective coatings, Powder coatings, and Marine coatings.

2024 Growth Trends per Industry Segment \$ USD

Industry Segment	United States		Canada		Total	
	Litres	Value	Litres	Value	Litres	Value
Deco	0.0%	1.0%	0.50%	1.50%	0.0%	1.0%
Auto OEM	3.0%	4.0%	3.00%	5.00%	3.0%	4.1%
Auto Refinish	0.5%	1.5%	0.75%	2.75%	0.5%	1.6%
Med & HDT & Bus	0.5%	1.5%	1.00%	2.50%	0.5%	1.5%
Motorcycle	1.5%	2.5%	1.75%	2.75%	1.5%	2.5%
Rail	1.5%	2.5%	1.75%	2.75%	1.5%	2.5%
Trailer	1.5%	2.5%	1.75%	2.75%	1.5%	2.5%
Aerospace	1.5%	2.5%	1.75%	2.75%	1.5%	2.5%
Powder (volume in KT)	1.0%	2.0%	2.00%	3.00%	1.1%	2.0%
Wood	1.0%	2.0%	1.50%	2.50%	1.2%	2.1%
Coil	0.5%	1.5%	1.00%	2.00%	0.5%	1.5%
Rigid Can Packaging	1.0%	3.0%	1.00%	3.00%	1.0%	3.0%
Flexible Packaging	1.5%	2.5%	1.75%	2.75%	1.5%	2.5%
GI	1.0%	3.0%	1.50%	3.50%	1.0%	3.0%
IM and PC	2.0%	3.0%	2.50%	3.50%	2.1%	3.1%
Marine	2.0%	3.0%	2.50%	3.50%	2.0%	3.0%
Total	0.5%	1.7%	1.0%	2.2%	0.5%	1.7%

Table 1.0

2024 Litreage and Value Forecast per Industry Segment \$ USD

Industry Segment	United States		Canada		Total	
	Litres	Value	Litres	Value	Litres	Value
Deco	3,057	\$ 18,811	303	\$ 1,853	3,361	\$ 20,664
Auto OEM	201	\$ 1,817	25	\$ 216	226	\$ 2,034
Auto Refinish	143	\$ 3,016	8	\$ 207	151	\$ 3,223
Med & HDT & Bus	23	\$ 274	1	\$ 9	24	\$ 283
Motorcycle	4	\$ 41	0	\$ 1	4	\$ 43
Rail	19	\$ 251	2	\$ 25	21	\$ 276
Trailer	4	\$ 67	0	\$ 2	4	\$ 69
Aerospace	8	\$ 253	1	\$ 25	8	\$ 278
Powder (volume in KT)	158	\$ 1,672	11	\$ 70	169	\$ 1,742
Wood	157	\$ 965	69	\$ 384	226	\$ 1,349
Coil	111	\$ 1,198	9	\$ 99	120	\$ 1,297
Rigid Can Packaging	149	\$ 701	8	\$ 34	157	\$ 735
Flexible Packaging	60	\$ 385	3	\$ 18	63	\$ 403
GI	455	\$ 2,719	22	\$ 131	477	\$ 2,850
IM and PC	137	\$ 1,595	28	\$ 228	166	\$ 1,823
Marine	64	\$ 822	3	\$ 26	67	\$ 848
Total	4,829	\$ 34,587	498	\$ 3,327	5,327	\$ 37,914

Table 2.0



A 'Whole of Industry' Approach is Now Needed

“ The use of a suitable alternative chemistry — sometimes a very different chemistry — requires significant time and resources to test a variety of paint properties, especially when they are impacted by further regulatory restrictions limiting access to key active ingredients.

These might include any or all: changes in the VOC-exclusions status; possible DSL/NDSL de-listing creating a need for new ingredients; new CMP toxicity decisions targeting or compromising the use of a key formula to achieve the Government-mandated low-VOC limit; non-availability of effective biocides for waterborne products in Canada that can still be used in the US, etc. For example, the replacement of a dry-film biocide alone requires a minimum of three to five years of exterior exposure on a test fence or substrate in the North American regions in which the paint or industrial maintenance product is sold and demanded by customers focused on reducing lifecycle costs by protecting valuable assets. ”
(CPCA Member Company)

Canada's chemical sector is subject to increasing legislative and regulatory change, more now than at any other time in the past. How the currently proposed regulations, now moving forward, are finalized over the next year or two will greatly impact the CASE industry for years to come. If industry wants positive outcomes the time to engage on these proposed changes is now. It

requires a **'whole of industry'** approach to ensure fair regulations for products so they continue to deliver the functionality that customers demand. This can be done while still moving toward more sustainably sourced materials as the industry has already shown it can deliver.

The proposed regulatory changes, some of which are noted in this edition of INSIGHT, are just a few of the new requirements that will impact all companies doing business in Canada. This will be the case for manufacturers, suppliers, distributors, equipment suppliers and those businesses relying on CASE products to sustain their business. The work ahead will be time consuming, challenging and will require significant engagement by all stakeholders with common interests. **The more industry support behind regulatory initiatives, the better the outcomes will be.**

The coatings industry is among the most heavily regulated sectors of the economy when it comes to chemicals in products. That was evident in the first three phases of Canada's Chemicals Management Plan (CMP) over the past 15 years where 4,300 chemicals were prioritized for



assessment and 1,550 of those are used in literally thousands of CASE products. The order of magnitude on chemical assessment in Canada will without a doubt be much greater when current regulatory changes move through the consultation stage and become law.

CPCA's monthly Regulatory RADAR for members provides detailed regulatory updates on 'all' the issues facing the sector. It details CPCA's ongoing work for the benefit of all segments in the CASE industry related to the currently proposed regulatory changes and impacts on the sector, such as:

- Lower VOC limits for AIM, Auto Refinishing, and Industrial and Commercial Adhesives & Sealants.
- Biocide cancellations and restrictions for paint preservation
- New initiatives to risk assess 4,700 PFAS chemicals, which could increase to 10,000 thereafter and many of those are present in CASE products
- Significant legislative amendments to the *Canadian Environmental Protection Act (CEPA 2023)* on which officials are now consulting stakeholders, to June 2025, will result in new regulatory requirements for industry
- 1,000 new substances already prioritized for assessment in CMP-4 now require industry's initial feedback via mandatory data gathering and more surveys to come in 2024
- A number of proposed regulations for increasing labelling of chemicals in consumer products.
- New initiatives to increase supply chain transparency, which also means more labelling

- Proposed requirements for recycled content in plastic packaging, containers and equipment and new approaches restricting potential microplastic releases ... and the list goes on

These are some of most pressing challenges now at play at the federal level. These are in addition to the already significant regulatory workload for the CASE industry over the past 10-years. **What happens in the next two years will decide how the industry will be impacted over the next 10-years.**

The hope is that the politicization of the regulatory process recently experienced during legislative changes to CEPA, especially in the Senate, will return to more evidence-based decision-making when assessing the risks of chemicals in commerce. CPCA and its members have proven that the work they do makes a difference for the entire industry over the long-term. **More support is needed now as the level of regulation ramps up over the next several years. All those impacted in the industry must be engaged and help support the quest for better regulatory outcomes while still pursuing more sustainable approaches. Industry has proven it can walk and chew gum at the same time!**



“ CPCA member companies continue to be at the heart of ‘regulatory modernization,’ providing insights on best practices, scientific data, and real-world case studies. This is critical for supporting a risk-based approach for fair regulations.

Gary LeRoux
CPCA President & CEO



Chemicals Management



VOC Emissions & Air Quality



Biocide Preservatives & Treated Articles



Workplace Health & Safety



4,700 PFAS Substances



Plastics & Microplastics



Product Stewardship & Recycling



Supply Chain Management



Trade Policy & Regulations



Canada-US Regulatory Co-operation



International Protocols on Chemicals and ESG Initiatives



Advocacy Report

CPCA Champions the Coatings Industry

The Canadian Paint and Coatings Association (CPCA) understands how policy, regulations and industry are intricately connected. Business outcomes can be negatively affected if government creates policy without a holistic approach that considers impacts to **industry**, the **environment**, and the **economy**.

CPCA believes that collaboration between industry, government, and regulatory stakeholders is key to creating successful policy changes that are rooted in evidence-based discussions, scientific facts, and industry best practices.

Critical Industry Feedback

CASE companies play a critical role in the Association's advocacy efforts. Their data helps

Issue Tracking

CPCA **manages a wide range of key issues** on behalf the Canadian CASE industry. The Advocacy Report provides an overview of key issues for the industry in four critical areas:



Chemicals Management



Product Stewardship



Air Quality & Environment



Health & Safety

The **resources** required for effective issue management are curated on a comprehensive digital database for the CASE industry, the Canada CoatingsHUB. **Notifications are automatically sent** directly to members when new resources are posted to ensure full compliance. Monthly regulatory updates for 'members only' are provided via the **Regulatory RADAR** newsletter ensuring members do not miss what matters most. And, most importantly, reminders are automatically sent to members in advance of compliance related deadlines that must be met by law.





4,300 + Chemicals in commerce in Canada have been risk assessed to date under the Canadian Chemicals Management Plan (1550 in the CASE sector) and several thousand more prioritized for assessment over the next five years.

60 Legislative Amendments to the Canadian Environmental Protection Act (2023)

In April 2023, the Government of Canada adopted the *Strengthening Environmental Protection for a Healthier Canada Act* replacing CEPA 1999. The amendments to CEPA updates the regulatory framework for assessing and managing toxic substances, while at the same time improving transparency and accountability of chemicals in commerce. Consultations on the implementation framework will take place over the next two years ending in June 2025. A draft of the framework is expected to be published in Fall 2024. **The CASE industry must be fully engaged.** A new clause recognizing the *Right to a Healthy Environment* (RTHE) is now under federal law, but it is still unclear what further requirements this will mean for industry. **It will be critical for the CASE industry to make its views heard with strong technical and/or legal support to ensure new regulations are appropriate in the context of manufacturing challenges related to product formulation, innovation, customer demands and business operations generally.**

Changes likely to impact industry most include:

1. The obligation to consider vulnerable populations and cumulative effects in risk assessments;
2. The obligation to reduce animal testing related to product development;
3. New obligations for companies to communicate new chemical activities across the entire supply chain;
4. Increased labelling;
5. The Minister's new ability to add chemicals to a 'watch-list' with the potential to become toxic in the distant future based only on a citizen's request;
6. New powers to disclose explicit masked names and the related CBI;
7. To encourage use of new approach methodologies (NAM) for assessing chemicals, which still have credibility concerns related to acute toxicity and could negatively affect future chemical risk assessment decisions and how chemicals are risk managed via more stringent regulations, bans, use restrictions, etc.

Federal Government Wants More Labelling for Toxic Substances in Products Including Flame Retardants

A series of 'policy lab' workshops concluded last fall on the blockchain approach in labelling of consumer products, which led to a Notice of Intent (NOI) before the CEPA amendments were adopted in Parliament. The Government is committed to improving human health by addressing the environmental impacts of consumer products and by introducing mandatory labelling of chemicals in consumer products. The Government is still working on a strategy to enhance supply chain transparency and increased labelling. **CPCA members are concerned that "taking into consideration other existing regulatory regimes" may also mean new mandatory labelling requirements that will change or add to existing requirements for related products, which may or may not enhance transparency, but will 'increase' costs.**

Federal Government to Restrict 189 Structural Analogues and Functional Alternatives to BPA

In March 2021 a long list of BPA structural analogues and functional alternatives was published. Bisphenol 'S' is known to be used as a BPA substitute in coatings, adhesives, sealants, and elastomers (CASE). Other BPA structural analogues may also be used. Given the commercial status, industrial processes (e.g., facility releases) in downstream uses of BPA structural analogues and functional alternatives, it is expected to be prioritized for additional risk assessment in the next phase of CMP targeted for release in 2024. In March of 2023 the federal Government published a compilation of all non-confidential information received from the mandatory S.71 survey. **CPCA continues gauging members' views on this information to ensure better outcomes for the CASE industry. Meanwhile, the European Union recently proposed restrictions be placed on the market for any food coating materials and packaging containing BPA derivatives.**



Government Wants to Unmask Identities of Hundreds of Substances in CASE Products

The federal Government recently published a Notice of Intent for companies with ‘masked identities’ of 132 substances that have been in place for 10 years or more. Those companies submitted CBI applications for the substances and objected to their un-masking and will now have to re-submit a ‘masked name application’ to prevent identities from being disclosed. This approach will play out over the coming months and possibly years without a more fulsome engagement with Government needed by industry **so as not to release potentially sensitive commercial information related to their products.**

Increasing Federal Government Action on Plastics

As part of the federal *Zero Plastic Waste Strategy* the federal government published a Notice of Intent listing applicable plastic manufactured prescribing a minimum amount of recycled content by 2030 as well as two detailed technical papers on the subject. The Government’s target is 50 percent recycled content in manufactured items. This will impact manufacturing of paint products sold in rigid plastic paint containers. **The proposed regulations are expected by the end of 2023.**

The federal Government’s first framework proposes to phase in mandatory recycling content and labelling requirements for all rigid and flexible packaging by 2030. It will mainly apply to short-lived plastic packaging for both consumer-facing and commercial, industrial, and institutional (ICI) products and will include transport packaging. **The second framework will include requirements to report on the Federal Registry all plastics placed on the market.** For paint, the requirement to register will be due in Phase 2 (June 1, 2026) followed by reports on the plastics collected for diversions, reused, repaired, recycled, or recovered for energy due in Phase 4 (June 1, 2028). **CPCA continues to engage on this matter to provide relevant feedback as it moves forward to mandatory requirements, just around the corner.**

Canada’s Nanoframework and Regulatory Development

Last year, at a CPCA Paint and Coatings Working Group meeting with members and federal officials, it was noted that officials would rely on their nano risk assessment approach for existing nano TiO₂ and nano zinc oxide forms based on 2014 data and will no longer need to proceed with a national mandatory survey on their current uses or presence in CASE and other mass consumption products to complete their assessment. **Officials will use these two priority substances in their nanoforms to further develop their regulatory approach.**

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Microplastics and Paint

A major concern for the coatings industry is with unintentionally added, secondary microplastics that result from wear and degradation of paint and coatings. Overall, there is still no scientific consensus of any negative environmental or health impacts of unintentionally added microplastics or their releases originating from paints or inks. In the meantime, the EU has been moving fast on some form of regulation for microplastics, which will set a precedent that could end up on the radar in Canada. The EU member states approved the European Commission's complex proposal to restrict intentionally added microplastics in rinse-off products including waxes, polishes, and detergents among others.

Code of Practice Approach for More Environmentally Sound Management of Chemical Substances

The purpose of the proposed Code is to provide guidance on best practices to chemical manufacturers, formulators and distributors in the chemicals, plastics, and rubber sectors to prevent releases of chemical substances to the environment. In addition to providing general guidance to all facilities in the targeted sectors,

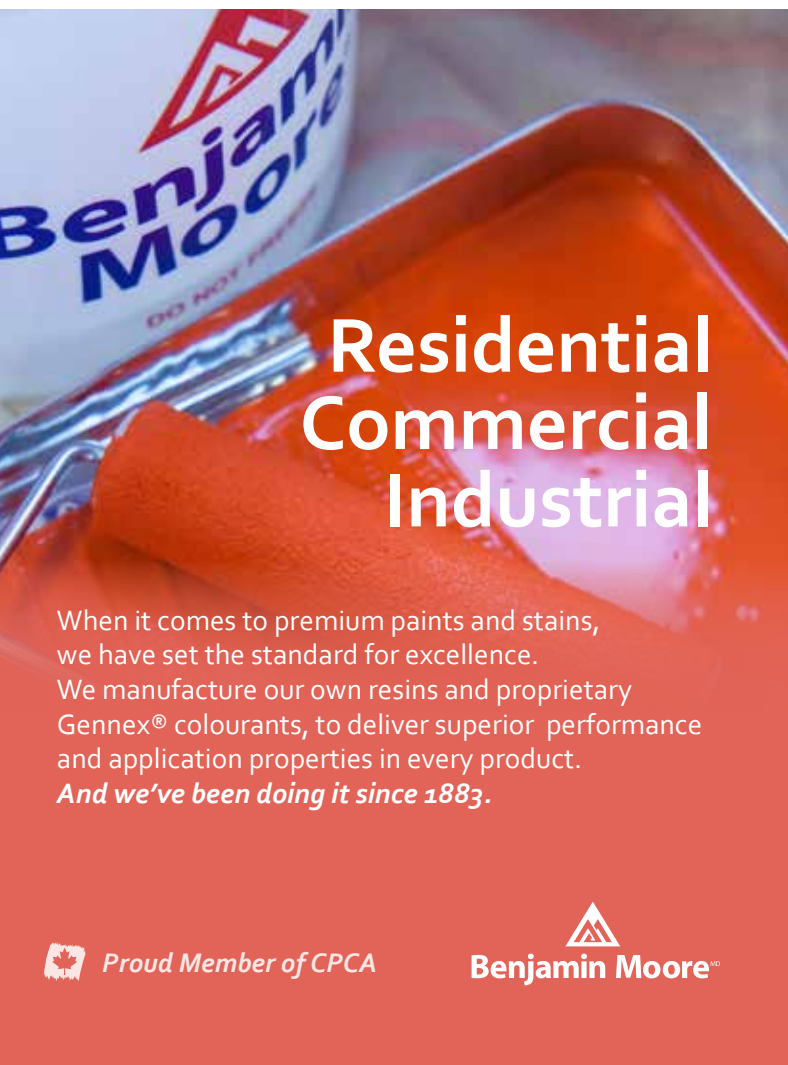
ECCC intends to use the proposed Code as a supporting risk management instrument to address specific substances used in the chemicals, plastics and rubber sectors that are added to Schedule 1. The consultation ended in early April and the final code of practice is now in preparation. During first three quarters of 2024, **CPCA chemical manufacturers and distributors should expect the publication of the Code of Practice for the Environmentally Sound Management of Chemical Substances in the Chemical, Plastics and Rubber Sectors.**

Update on Regulation to Risk Manage MEKO (2-butanone Oxime)

CPCA continues to engage with Health Canada officials to discuss the very low limits of MEKO in interior/ exterior consumer paint, stain, gasketing adhesives and silicone sealant products that were proposed in 2022 to replace the existing Code of Practice, which CPCA and Health Canada agreed on more than 6 years ago. CPCA is compelled to reiterate its members' concerns with **Health Canada senior officials regarding an arbitrary decision to now impose lower limits, which is effectively a ban with no consideration of potential cost-effective alternatives.** In the rush to move away from the Code and regulate MEKO the federal Government failed to consider the impact of the new VOC AIM regulations that will significantly reduce MEKO exposure as it will eliminate the majority of consumer solventborne products in Canadian commerce, except for some specialty industrial maintenance products used by professional painters wearing the necessary personal protection equipment. **This continues to be a point of contention, which will be resolved one way or another in the coming year with further engagement with Government.**

Draft Assessment Report for Assessing Titanium Compounds Published in Fall 2023

The publication of the draft screening assessment report (DSAR) for TiO₂ and related titanium compounds was scheduled for Fall 2023. Over the past several years the Canadian government postponed the publication of this draft, clearly leaning towards a declaration for TiO₂ similar to that of the European Union in 2020 with a designation as a Category 2 carcinogen. In Fall 2022, the EU Court ruled that the European Commission made an unfortunate error in its final assessment raising questions as to reliability and acceptability of the study on which the Category 2 classification was initially based. CPCA took every opportunity in meetings and formal submissions on the draft assessment to remind Government that following the EU would be inappropriate. After considering all the information presented in the draft assessment, the Government of Canada proposed



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to conclude that the 13 substances in the Titanium-containing Substances Group do not meet the criteria under paragraph 64(c) of CEPA as they are not entering the environment in a quantity or concentration or under conditions that constitute or may constitute a danger in Canada to human life or health.

Six Flame Retardants (FR) Proposed for Addition to Schedule 1 of Toxic Substances

TPHP, BPDP, BDMEPPP and IDDP are proposed toxic to the environment; TEP is proposed toxic to human health; and IPPP is proposed toxic to both the environment and human health. All are used as additives/pigments in paints and coatings and two (IPPP and TEP) in adhesives and sealants. IDDP and TEP are also used in food packaging. Health Canada's main concerns are dermal effects resulting from exposure in certain consumer and/or children's products and articles. Strangely, one substance, PIP (3:1), is not proposed for prohibition in Canada meanwhile the US EPA is proposing it for prohibition in various applications. **CPCA submitted comments on the DSAR to ensure that no industrial and commercial CASE products and/or raw materials are conclusively prioritized for risk management in the final assessment report (FSAR) which is now postponed to Spring 2024.** CPCA also took this opportunity to oppose any future FR assessments that would impose mandatory labelling of flame retardants in consumer products. Recall the federal Government launched a Notice of Intent to enhance the labelling of flame retardants in consumer products in October 2022. **The final screening assessment report for the six retardants is expected for publication in Spring 2024.**

Proposed Ban of All Coal Tar-based Sealants in Canada Published in Fall 2023

The final screening assessment (FSAR) and Risk Management (RM) approach recommending the addition of six coal tars to Schedule 1 was published in June 2021. The proposed RM instrument added a broader scope for sealants products, which goes well beyond just the use of coal tar-based pavement sealants, as originally intended. Some of these "Unknown or Variable Composition Reaction Products or Biological materials" (UVCBs) were still used in various types of sealants for metal protection against corrosion and in marine coatings/sealants. **CPCA submitted comments urging the government to narrow the scope of the proposed prohibition to pavement sealers and roofing sealants only. These comments led the government to launch a consultation on the proposed regulatory ban at the end of 2021 to investigate the remaining uses of these substances in the CASE sector.** Certain

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CPCA members then decided to move away from their uses in CASE products pending a ban; however, they needed a 2–3-year sell-through period after the ban takes effect. In 2022, based on this information, the Government confirmed at a Paint and Coatings Working Group meeting, that the pending regulations would still prohibit the use, manufacture, and import of ALL coal tar-based sealants.

Officials advised CPCA that the proposed regulations would be published in Fall 2023. The final regulatory ban might come into force as soon as in Fall 2024. A separate regulation is planned to specifically limit the use of PAHs in coal tar sealants.

Risk Management Instrument Coming Soon for Benzophenone

In January 2021, the federal government concluded that benzophenone was toxic for human health for both inhalation and dermal exposure in certain products, including interior and exterior paint and coatings as well as stains. An order proposed the addition of benzophenone to Schedule 1 in April 2022. For paint and coatings and stains, a Code of Practice limiting the concentration of





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- CFIA Non-Food Chemical Application Services
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Benzophenone to 0.1% w/w will likely be developed as the risk management instrument, which may also include a recommendation for additional labelling. **A working group was established in concert with CPCA to ensure a collaborative and effective development process for the Code of Practice for benzophenone and first met on September 21, 2023, with further consideration by the Working Group before year-end 2023.**

Final Screening Assessment Report for the Alcohols Group Coming in 2024

Three substances (1-butanol, methanol, and benzyl alcohol) are used in consumer CASE and allied products extensively, especially 1-butanol. Last year's DSAR and Risk Management Scope implicated very few specific CASE product categories containing the first two substances due to human health concerns for inhalation, but no CASE products are of concern for benzyl alcohol specifically. **The final risk assessment report is expected in 2024.**

For methanol: The assessment pointed to undue short-term indoor inhalation exposure originating from consumer paint/varnish remover products containing 10 or 35 percent methanol concentrations. The estimated mean concentration in bathtub resurfacing products also raised concerns.

For 1-butanol: The short-term inhalation exposure scenario confirmed neuro-developmental and developmental risks associated with consumer lacquers at more than 1 percent. The proposed regulatory and non-regulatory risk management actions will be focused on reducing inhalation exposure to methanol from paint/varnish remover products available to consumers and to 1-butanol from lacquers. The risk management scope indicates no known alternatives for methanol and 1-butanol, except for benzyl alcohol, which will be added to Schedule 1. **CPCA submitted extensive comments on this proposal and will still be gathering more information regarding the socio-economic impacts and more evidence to challenge the decision at publication time. The draft risk assessment report for C3-C5 substances published in June 2023, using 1-butanol as the surrogate for the risk assessment, concluded that all six C3-C5 substances did not meet any toxicity criteria with no further action required.**

Additional Risk Management Actions Coming on the Phthalate (DEHP)

The final screening assessment for DEHP was published in December 2020. The proposed risk management measures were to amend the Prohibition of Certain Toxic Substances Regulations (2012) to add DEHP to prohibit the manufacture, import, use, sale, offer for sale of products containing it above a maximum concentration of 0.1% (w/w). A socio-economic impact study was conducted on the impact of a proposed regulation to prohibit this substance. A consultation and formal report were produced in 2022. The report found a number of manufacturers using the substance and that its use is increasing. More government enforcement activities are expected on other uses of DEHP in the CASE sector. **CPCA formally questioned the singular ban approach, which is at odds with other jurisdictions including Europe, and will continue conveying concerns to Government as a consultation will follow.**

Final Screening Assessment Report Expected for TCPP, TDCPP and Melamine

These three substances were part of the FR sub-grouping in CMP Phase 2. New information about their uses prompted the publication of updated DSARs and RM Scopes in October 2020 and to again propose the addition of Melamine and TDCPP to Schedule 1 for health concerns. **The final risk assessment report is**

being delayed until 2024 as an updated Human Health Risk Characterization Document for Melamine also has to be published.

CPCA informed members that they should review their potential uses of these FRs in textile and furniture coatings in Canada. Melamine is found in resins applied in laminates, plastics, paints, and coatings. Meanwhile, TCPP is used as an additive FR for the manufacturing of building or construction materials.

Final Screening Assessment for the Esters Group Coming in 2024

Several substances in the Esters Group are primarily used as solvents, including methyl acetate, propyl acetate, isobutyl acetate, methyl dodecanoate, dimethyl glutarate, triacetin, and 2,2,4-trimethyl-1,3-pentanediol diobutyrate. **In March 2022, the Draft Risk Assessment identified only 'methyl acetate' as potentially toxic for inhalation as it can break down into methanol.** Regulatory and/or non-regulatory measures are being considered for methyl acetate and follow-up activities for another substance, 2-methoxypropyl acetate. CPCA members do not use methyl acetate in aerosol adhesives or in paint/stain removers. **However, methyl acetate is listed as a VOC-exempt compound on Schedule I of CEPA and could become critical for some CASE products to achieve 'substantial' VOC emissions reduction** in the three VOC regulations in effect in Canada (AIM, Automotive Refinish and Certain Products including Consumer Adhesives & Sealants) and any future amendments and new VOC regulations that will be developed under the Federal Agenda 2022-2030. **CPCA will continue to advocate for retaining these VOC-exempt substances for their functionality especially ones that could help achieve 'substantial' VOC emissions reduction, which the Government has made a strong priority.**

Proposed RM Instrument Expected within 2.5 Years for Resin and Rosin Groups

In July 2022, the government published the FSAR for 12 substances in the Resins and Rosins Group and a proposed risk management approach was published for one substance in the group, crude tall oil (CTO). CTO meets one or more of the toxicity criteria and is recommended for addition to Schedule 1 and the proposed risk management instrument was to set regulatory limits in effluents. **CPCA submitted comments as to why Canada was particularly concerned with CTO while the EU and the United States have NOT implemented any equivalent toxicity reduction measures.** CPCA members and suppliers believe that the government should continue to focus its efforts on improving the efficiency of wastewater treatment methods only. In 2022 a Notice of Intent was published to amend the DSL to apply Significant New Activity (SNAC)



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provisions to 5 substances in the Resins and Rosins Group. Earlier in 2023, a proposed Order was published to add CTO to Schedule I of CEPA.

Additional Risk Assessment and Risk Management Activities Expected for Furan Compounds

The Draft Screening Assessment Report for Furan Compounds group was published in 2018. CPCA made submissions on two of four substances proposed to be health-toxic: Furfuryl alcohol (possibly used in wood strippers) and Tetrahydrofuran. **In March 2023, the Government published an Additional Risk Characterization Document in support of the DSAR for the CMP-3 Furan Compounds Group.** The risk characterization pertains to additional sources of exposure to furfuryl alcohol (CASRN 98-00-0) and tetrahydrofuran (CASRN 109-99-9) that were not initially considered and were found to pose harm to human health. An addendum to the RM Scope was published, including additional measures to reduce air exposure to these two substances in the vicinity of facilities in sectors of concern such as foundries and fabric coating facilities. At the last Spring 2023 PCWG meeting, officials could not confirm the timeline for the FSAR of this group. Additionally, a SNAC 2-furancarboxylic Acid came into effect in *Canada Gazette Part I* in July 2022 to limit its use at 0.1%. 2-furancarboxylic acid is a metabolite that appears in the urine of workers occupationally exposed to furfural, which is a marker of exposure to this compound. Furfural is a heterocyclic aldehyde that is commonly used as a solvent in industry. No members expressed concerns for this SNAC. **There is no clear indication now as to when the government will propose its risk management instrument and CPCA will act if and when the time comes. There is always the possibility that a larger class of furan compounds will be added to the list of substances contained in the next phases of CMP. Indeed, a recent Notice of Amendments to Unmask Identities of 132 Substances Listed as Confidential that contains many substances in which furan is said to be an integral part of the chemical structure of the masked compounds.**

CMP Phase 4

Federal Workplan on the Annual Inventory for CMP 2023-2024

The federal government launched the next chemical assessment 'Inventory Update' (IU) in June 2023, through a Section 71 (mandatory) survey comprised of 850 substances to be risk assessed and regulated in

some form after assessment. The deadline for industry to respond with views on that inventory is January 17, 2024. The annual quantity threshold generally is as low as 100 Kg/year and the concentration threshold greater or equal to 0.1%, depending on the inventory survey section, which can be very burdensome to report for the manufacture, import, and/or uses. Additionally, a notice for more 'targeted information gathering' is expected to follow the 6-month period ending later in 2024. **CPCA has analyzed potential application of this list for the next phase of CMP as well as for the development of new risk management instruments as a result of CMP Phase 3 assessment and the performance measurements included in future performance evaluation reports. Yet, in 2025, another Section 71 IU survey may be launched as well as a 6-month targeted information gathering and there is also a possibility that these IU surveys continue to run annually beyond 2025. Moreover, other surveys will be published in 2024 such as for certain 220 PFAS substances as well as for certain substances on the Revised Commerce List. CPCA urged the federal Government to further prioritize substances in such a way as to ensure a more manageable workflow and, most importantly, to share the list of substances with industry ahead of the Section 71 publications.**

Federal Government to Restrict Uses of PFAS in "State of Science Report and DSAR"

PFASs consist of a fully (per) or partly (poly) fluorinated carbon chain connected to different functional groups. The Government already prohibited the use of PFOS and PFOA 15 years ago and more recently the Long Chain PFAS, which are targeted for prohibition in Canada in Summer 2024. In April 2021, a Notice of Intent (NOI) to address a much broader class of 4,700 substances under the PFAS grouping was published under CMP. The paint industry widely uses fluoropolymers (FPs), which are included in this list. PFAS are also hidden in paint and coatings additives like surfactants at trace levels (they do not appear on the SDS) and can be present in some microbeads. The presence of PFAS in paint and coatings may also unintentionally originate from other sources like containers, water, and processing equipment. **As a result, many CPCA members may not have a true understanding of the actual total PFAS content of their products.** Depending on the PFAS definition, which varies between other NA jurisdictions, it may also capture a few HFC propellants and PCBTF as VOC-exempt compounds. **Moreover, assessing PFAS will likely to be a test case of a new/modified CMP class-approach with reduced risk assessment efforts and employing use of the precautionary principle to focus**

only on risk management activities, which has NOT been the practice to date with risk 'assessment' being the first order of priority.

The State of PFAS Report was published at the end of May 2023 and was immediately accompanied with a Draft Screening Assessment Report (DSAR). This is a significant departure from the normal CMP process. **CPCA submitted extensive comments focusing primarily on the process that led to the conclusions in the State of PFAS Science Report.** This was done rather than focusing on the contents of the report itself, which did not quantify the risks of PFAS, nor the key areas identified in the Science Report in terms of the potential impact on the CASE sector in Canada. A recent study on "Commercial Availability and Current Uses" of PFAS in the Coatings, Paints and Varnishes (CPV)" completed by the OECD in 2022 addresses PFAS only when 'intentionally added' in construction for many applications to protect critical infrastructure and by consumers to protect their critical assets. FPs constitute a very small percentage of the overall market share, less than 10 percent. The next priorities of risk management development for PFAS will likely be with respect to the short-chain PFAS (SC-PFAS) that were discussed in the DSAR. The SC-PFCAs can be present in some fluoro-surfactants used in the CASE sector.

CPCA followed up with the two Ministers at both ECCC and HC. CPCA felt it important to take a stand early in the process for the coatings industry and issued more than 14 recommendations. The main ones included the exclusion of fluoropolymers, the focus on intentionally added PFAS, and the impact of their approach on VOC-exempt compounds, and a revised definition of PFAS. CPCA continues to track the intensive regulatory development to restrict and manage PFAS, which is already happening across the US and in other countries. In the EU, REACH proposed to restrict PFAS manufacturing, use, and placement on the EU market. Although it is not a complete ban, the proposed thresholds will be varying from 25 ppb to 50 ppm (for fluoropolymers specifically). **Industry including the World Coating Council (WCC) commented on behalf of paint associations on this proposal by September 25, 2023.**

New Section 71 Survey on PFAS Postponed to Q2 of 2024

A broader national strategy for the 4,300 PFAS remains to be published. More regulatory development for the larger class of PFAS include continuing investment in research and monitoring; collecting and examining information via S.71 surveys on PFAS to further inform the class-based approach; and reviewing policy developments

in other jurisdictions globally. The Government plans to start its information gathering with the launch of a S.71 information gathering notice now targeting 220 primary PFAS, and PCBTF was originally included in a draft list of 107 substances disclosed with CPCA in 2022. **The threshold of the PFAS survey will be extremely low: 10 Kg annually. Officials are currently forming a subgroup to address how PFAS should be added to the NPRI (National Pollutant Release Inventory) list. Other companies in the chemical sector confirmed that federal Government enforcement officers already track PFAS when visiting companies.**

New Objective for Controlling PFAS in Canadian Drinking Water Published in April 2023.

CPCA submitted comments questioning the pressing need of the wide-scale precautionary measure and underlining several technical challenges and high-cost burden, as well as the lack of any upstream PFAS-removal actions in wastewaters, and the misalignment with other NA standards.

Final Publication Postponed to Summer 2024 on Prohibition for Certain Toxic Substances Regulations

These regulations would further restrict the manufacture, use, sale and import of three groups of oil and water repellents including perfluoro-octane sulfonate and its salts/precursors (PFOS), perfluorooctanoic acid, its salts and its precursors (PFOA), long-chain perfluoro-carboxylic acids including their salts and their precursors (LC-PFCA), hexabromocyclododecane (HBCD), polybrominated diphenyl ethers (PBDEs), and two additional flame retardants Dechlorane Plus (DP) and decabromodiphenyl ethane (DBDPE) and products containing them. There will be a limited number of exemptions remaining for all of them. The two flame retardants were confirmed some years ago as being used in some adhesives and sealants. CPCA submitted comments in July 2022 with the main concerns dealing with the lack of an exhaustive list of substances targeted by these regulations and the toxic conclusion for the DBDPE, which was based on inaccurate assumptions made by federal Government screening assessments. **Over the past few years CPCA regularly alerted members about the upcoming prohibition of the two FR substances of concern and the other groups of substances related to PFAS. The final publication for its regulation and coming into force date is expected between winter and summer 2024.**



Issue Tracking

Product Stewardship



An average of 24 million kilograms of paint is recovered annually in Canada and diverted from landfill and waterways with 100 percent of the recycling costs paid by paint manufacturers.

Regulatory Burden Remains High for Paint Recycling in Ontario

Within *Household and Hazardous Program* for paint recycling in Ontario, a largest volume of waste collected in seven product groups is paint and coatings, at approximately 9,000 tons annually. The other large volume is three groups of automotive materials.

Under the initially proposed model paint producers were assessed more than 85 percent of the total estimated cost of the HSP program in 2023, while the other six materials, including automotive materials, would have only paid 15 percent combined. Thankfully, the Authority agreed to spread the costs more fairly with Paint and Automotive materials paying 45 percent each of the entire HSP costs. **This will save the Ontario paint industry approximately \$1 million annually in regulatory fees.**

The other remaining concerns for paint waste recycling in Ontario includes a misguided accessibility formula for waste recovery at municipal depots, Return-to-Retail sites, and events. The formula allows the paint industry to reduce sites in larger areas where they are needed and add sites/events in areas where they are not. There are also growing concerns with onerous annual reporting by producers, especially when products are shipped to Canada, and they have to rely on the 'first importer' for data; excessive auditing requirements previously handled by PROs; no realistic and independent complaints mechanism; excessive monetary penalties of up to \$1 million; and a very costly IT system already at \$15 million and another \$20 million expenditure to do the work PROs and/or producers previously did.

PMRA Cancels Critical Biocides Used in Paint Preservation

In July 2020, the Pest Management Regulatory Agency (PMRA) proposed decisions for six paint biocides (folpet, dazomet, chlorothalonil, diodofon, ziram, sodium omadine). Sodium omadine was approved for use in paint and coatings but at **ineffective lower label**

rates. Chlorothalonil use would still be accepted in latex and solvent-borne paint but cancelled for use in exterior paint and wood panels. Dazomet accepted for use in paint with reduced limits but will be **cancelled in paper and paper coatings** and its annual production volume limited. Ziram and folpet's registrations for use in adhesives and paints respectively will be **cancelled**. For diodofon, although this biocide and others like ziram or dazomet do not appear to be used much by CPCA members, the paint industry wishes to retain current use for these biocides as it will have to find ways to prevent biocontamination in paint products and treated articles. CPCA provided extensive technical comments.

Registrants and paint manufacturer members were not contacted during the 2 1/2-year period following PMRA's proposed decisions and the final decisions for the paint cluster were published on December 8, 2022, with very minor changes and limited information communicated on the stop manufacturing and import dates and phase-out periods, which were mostly applicable within 24 months following the publication date. Dazomet itself is cancelled for uses in paper and paper coatings. The use of Diodofon was cancelled in three categories of products: exterior paint, wallboard joint compounds and leather tanning. The final PMRA decisions on lower label rates and cancellations will not come into effect while Category B submissions can be made. **CPCA member registrants are still discussing the Category B option for key paint biocides such as folpet, chlorothalonil and sodium omadine.**

The US EPA has not followed the PMRA in this regard on those biocides and not fully aligned with the PMRA in terms of restrictions, product stewardship requirements or implementation timelines. **This lack of alignment and transparency is not helpful for a highly integrated industry like paint and coatings in North America.**



PMRA Continues Targeted Review of the Pest Control Products Act

In 2022, PMRA published a discussion document to begin the process of ‘modernizing’ the *Pest Control Products Act* to improve business practices and enhance transparency. The targeted review seeks to further strengthen the protection of health and the environment while alleviating current pressure on PMRA’s resources. The Committee has been engaged with industry and NGOs on technical issues over the past two years. CPCA was well represented on the main committee as well as at some technical tables. CPCA had the opportunity to raise concerns on the use of so-called “citizen science,” which has no basis in formal pesticide

evaluations. Risk assessments must be based on peer-reviewed scientific publications. Meeting notes and related PMRA presentation documents were posted on CPCA’s CoatingsHUB. Health Canada published a report in Early November 2022 highlighting areas of consensus and divergence among the 40 virtual engagement opportunities and over 120 submissions. The main areas of divergence are with pesticide manufacturers and other user groups wanting modernization of the Act under the current regulatory framework, while NGO groups are pushing for sweeping legislative changes. **A Notice of Intent has been published that seeks to make company identity information public during new active ingredient applications, new registrations, re-evaluations, and special reviews for paint preservatives.** CPCA continues to advocate for a rigorous scientific approach as PMRA moves forward in its efforts to ‘modernize’ operations.

A new continuous oversight policy from pre-registration, and prior to re-evaluation of pesticides, has been drafted and stakeholder consultation began at the end of October 2023 in various provinces as well as virtually. PMRA says it will present the detailed process they envision, provide more clarity on how it would be implemented and seek feedback on a new approach to improve the current process. **PRMA works toward the implementation of the PCPA modernization during the next fiscal year ending in March 2024.**

Access to Test Data

PMRA wants to facilitate access to confidential test data & propose new ministerial authority ordering cumulative impact assessments. Many have argued that PMRA should provide CTD access to college/university researchers in the field per a new accreditation mechanism, which would include a formal, sworn affidavit to ensure compliance with Canadian law protecting Confidential Business Information (CBI) while still providing a reasonable level of transparency. It should also ensure appropriate compensation for data generated by registrants. Accreditation



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would be developed for professionals, laboratories, and universities specializing in the field of pesticides/biocides assessment and management. Accreditation would have to be renewed annually and those accredited should be permitted ongoing access to the test data to better inform the evaluation process with independent data review. **The proposed new Ministerial authority mandating cumulative impact assessments should have included more sharing of details on the methodology and tools to be used in risk assessments of cumulative effects on the environment.** It should also be conducted in close collaboration with the US EPA methodology to prevent any further erosion of regulatory alignment. When studies on cumulative effects of pesticides/biocides are in the process of assessment all relevant active ingredients must be reviewed based on common modes of use and common toxicological endpoints.

PMRA Cancels the Registration of Diuron in Canada

After a 4-year review of Diuron, PMRA did not approve its new registration in Canada. PMRA’s decision was not explained to registrants, nor any supporting information or further details provided before for the review.

PMRA Phases Out Pentachlorophenol on October 4, 2023

Pentachlorophenol was registered as a heavy-duty wood preservative in Canada and its use will be phased-out by the end of 2023. Because pentachlorophenol is usually contaminated with hexachlorobenzene, which is a Track 1 substance under Canada’s Toxic Substances Management Policy (TSMP), and because pentachlorophenol is included as a POP under the Stockholm Convention, it is subject to Virtual Elimination. Its use will be prohibited in treated-wood products after the phase-out deadline and all existing inventories eliminated except for utility poles.





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Challenges Preserving CASE Products in Canada

A cluster of 6 biocide preservatives for paint, regulated by the Pest Management Regulatory Agency (PMRA), were recently cancelled or had use level restrictions rendering them useless for in-can paint and film preservation.

This was done despite the fact that almost 95 percent of architectural paint volume is now water-based, representing about half of all paint sold in Canada. These water-based coatings necessitate active ingredients to prevent biocontamination. These biocides are used for preserving paint and coatings in the can, in storage, during distribution, at retail and on the substrate to which they are applied. The data and risk assessment methodology for recent PMRA decisions is still unclear and without full consideration of the actual, available data especially as it relates to efficacy data. Yet, such data is used widely by the US EPA to assess these and other biocides. Yet there were no similar bans or use restrictions for these critical ingredients in the United States, and none expected in the foreseeable future.

The approach in Canada seems to contradict the regulatory alignment sought by both countries under the Canada-US Regulatory Cooperation Agreement. When asked about the discrepancy in Canada, industry is simply told that it is a “matter of policy” for Canada in terms of the toxicological reference values used for the evaluation starting point. One might then conclude that such decisions are not just a matter of science per se. This means the Canadian CASE industry will have trouble aligning

with its largest trading partner now accounting for approximately 50 percent of all paint products sold in Canada. As such, those products being shipped to Canada will have to be reformulated or discontinued. **How will that impact competition and pricing in Canada? Will this add to inflationary pressures if products are taken off the shelf in Canada? What about the longevity and functionality of products in the can? Will there be more biocontamination of coatings products, and other treated articles in Canada, and thus more negative health effects for Canadians? Tough questions!**

Adding insult to injury there are now very few alternative biocides that can be used for the preservation of coatings and CASE products more generally. There are some still widely used in other countries but not approved for use in Canada. This may also mean there will be reduced microbial control for the more sustainable and recyclable water-based paint, which has achieved impressive VOC emissions reduction over the past 20 years by 85 percent in architectural coatings, equating to 48 kilotonnes or the equivalent of 300,000 automobiles taken off the road. And ultimately it means less trade between Canada and the United States in the sector and possibly other treated articles relying on the same biocides.



Current approaches will need to change significantly, which PMRA has suggested they would as part of its ongoing 'modernization' effort seeking more transparency and openness. If that is the end goal, PMRA will need to seriously consider the following:

- Much clearer understanding of PMRA's approaches to evaluating the efficacy of antimicrobial preservatives for use in paint and coatings specifically
 - More insight on how antimicrobial pesticide registrants and end-users formulate, select, and evaluate preservatives for use in various paint and coatings applications
 - Ensure full consideration of primary factors such as the versatility and complexity of coating types, physio-chemical impacts, performance, and shelf-life expectations, changing susceptibility of coatings at various stages of use, and organism adaptation to biocides
 - A better understanding of how regulatory actions impact the availability of actives, how it may limit the success of adequately preserving the myriad of coating types and how this could ultimately have immense environmental impact wherein spoiled products require re-manufacturing, re-application, and disposal
 - New approaches to evaluating antimicrobial preservative efficacy data versus that of the US EPA in various coatings and CASE product types more generally for both in-can and dry-film preservation
 - Consideration of optimal formulation for stability of antimicrobial composition related to VOC-free and low-VOC products
- Evaluation of suitability and performance in various coating types for compatibility, efficacy and complexity while considering all aspects such as colour, viscosity, stability, longevity, and in-service performance
 - How to best address and coordinate labeling strategies for paint and downstream users, especially in case of cancellations and use restrictions

There is still much work to do especially in the context of multiple regulatory changes targeted directly at CASE products in Canada wherein a combination of impacts all occurring at the same time could be catastrophic for the industry. If companies cannot preserve coatings, both in the can and on the substrate, as demanded by customers, there will be pain.

There will be **less competition** because there will be **fewer products** on the shelf if they cannot be preserved, even if preserved, they **won't last on the substrate** for more than weeks or a few months. Once on the shelf the lack of competition will **drive up prices** as only new higher cost reformulations will work, maybe, which will lead to less competition. And worst of all, SMEs will be most heavily impacted as they will not be able to invest in the innovation and testing needed for improved reformulations. **It's a downward economic spiral in the making.**





Canada's coatings industry has reduced VOC air emissions in architectural paint by 85 percent over the last 25 years, equivalent to 48 kilotonnes.

Federal Agenda Wants Even Lower VOC Emissions from the CASE Industry

The Notice of Intent of the Federal Agenda (2022-2030) was published in the *Canada Gazette, Part I* in July 2022. Government is first seeking further VOC emissions reduction focused on portable fuel containers; then amending current *Architectural and Automotive Refinish Coatings VOC Regulations*. The federal Government is now considering a new risk management instrument after analyzing a recent consultant report for industrial and commercial adhesives and sealants per a formal consultation CPCA had with ECCC in May 2023. CPCA submitted additional comments pointing out several inaccurate data points, asked for further explanations for the numbers used as justification for stricter limits and reiterated technical challenges associated with the adoption of some California VOC limits. ECCC will later address the risk management of printing on plastic packaging. **Additional information is now being collected to evaluate potential emission reduction opportunities for the following sectors: cars, vans, light trucks assembly and auto parts coatings, as well as plastic, rubber, leather, and glass coatings.**

Lower Limits for Architectural VOC Regulations

The comment period for Canada's pre-consultation on a 'hybrid approach' largely based on CARB VOC limits plus several adopted from OTC II limits in the U.S. (i.e., categories with no CARB equivalent) ended in February 2023. The formal proposal to targeted 49 categories (which include 10 new ones) is expected to be published in the *Canada Gazette Part I* in Spring 2024. CPCA's most recent engagement with ECCC officials was in June 2023 as there are still serious technical concerns in meeting the proposed limits in certain key high-volume categories and has sought an extension to provide further comments from members to the end of October 2023. **The final new Architectural and Industrial Maintenance (AIM) Regulations will likely be finalized at the end of 2024 or in the first part of 2025.**

At the last Paint and Coatings Working Group (PCWG) meeting of 2022 and a subsequent webinar specifically for CPCA members in mid-January, ECCC officials maintained that the current compliance rate in 2018 survey data showed 30-50 percent complying with existing CARB limits. ECCC believes the strict CARB VOC limits already achieved by some companies means other companies could 'easily' adopt the same limits. However, that is not the case writ large and some Canadian-based SMEs in particular will have technical challenges meeting CARB limits. In 2022, CPCA made substantive comments raising technical issues related to the Nordic climate and the fact that CARB is still officially adopted in only one US state (California) and quite a number of jurisdictions in California do not even meet the CARB limits. CPCA consulted all AIM members and re-submitted extensive comments in early February 2023. **The availability of a one time-renewal of existing limits per a 24 month-permit option will not be sufficient or cost-effective for industry to support CARB conversion throughout Canada for many product categories.** Some of the more crucial obstacles included the removal of the key 1-L exemption in categories with solventborne formulations such as exterior wood stain, rust preventative coatings, dry fog, wood coatings, etc.

CPCA comments demonstrated the following:

- That Canadian manufacturers would clearly be at a competitive disadvantage compared to US manufacturers who had many years to research and manufacture products at lower CARB VOC limits for California's market and the cost of converting to lower limits and related technical challenges were clearly underestimated by a significant amount for Canadian companies moving from OTC I to CARB limits
- Before ECCC expeditiously moves to the *Canada Gazette Part 1*, CPCA formally challenged moving forward in the adoption of CARB VOC Limits in Canada via a letter to ECCC's ADM in April 2023



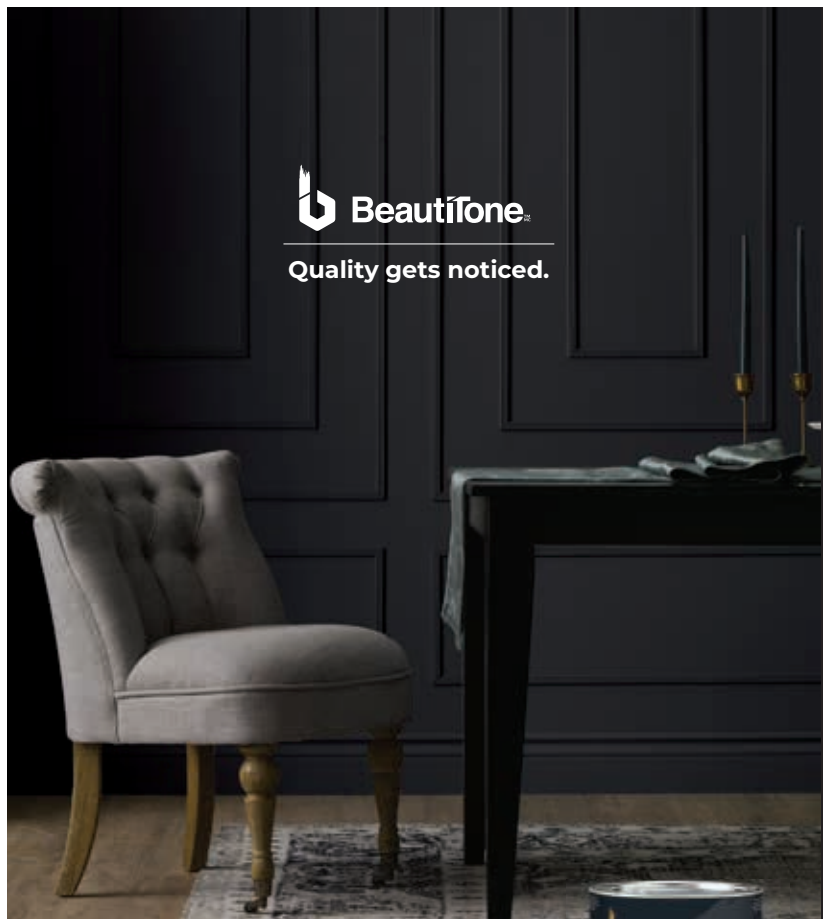
- CPCA and its members remain open to more direct discussions with ECCC senior officials and participated in a virtual meeting with ECCC on June 21, 2023, regarding modifications or flexible solutions that might be identified prior to the publication of the proposed limits in the *Canada Gazette*

CPCA made it clear that there were a long list of concerns with CARB VOC category limits including the 1-L and the Low Vapour pressure exemptions. Following the June 2023 meeting CPCA sent a questionnaire to AIM members seeking further technical clarification and justification of the formulation challenge before the end of October 2023 before officials begin drafting the proposed regulations. **More information on possible Government incentive programs to support transition to lower CARB limits following their adoption were also sought. ECCC officials need further industry justification of the technical issues related to several proposed category limits before moving forward on 'the proposed' new limits and necessary timelines.**

Lower VOC Limits for Industrial, Commercial Adhesives & Sealants

The Federal government launched a survey in July 2022 to gather information on the VOC content of 73 categories of industrial, Commercial Adhesives and Sealants (ICAS) products. The VOC limits mainly reflected those of the SCAQMD Rule 1168 in California, OTC States and US EPA rules currently in effect. The consultant's survey was distributed to 64 Canadian and 75 US/International producers, and less than 40 responded with data meanwhile 31 said they were not implicated. The consultant admitted the survey coverage was uncertain and a very low response rate. The consultant report was submitted to ECCC on May 9th and presented to CPCA members in the ICAS segment. The findings are as follows:

1. That 84 percent of all products and litres supplied to the Canadian market in 2021 were already 'at or below' the VOC limits specified in the survey without any Canadian government restrictions.
2. Only 24 of the 73 ICAS sub-categories had products supplied above the VOC content limit.
3. Major potential VOC emission reductions will be expected from the following categories of products: Contact Adhesives, Wood Flooring Adhesives, Other Sealants, Other Adhesives Primers, Other Substrates. Once again, the total market extrapolation of litres and related cost analysis were derived from California results and thus can be challenged.



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- Overall, the potential VOC emission reductions from imposing more severe ICAS VOC limits are expected to be in the order of 2.1 kilotonnes, much less than the total ICAS VOC emissions anticipated 15 years ago.

The final report by the consultant will help ECCC determine potential VOC emissions reduction opportunities and economic impacts of further reductions. According to the *ECCC Federal VOC Agenda 2022-2030*, a new risk management VOC instrument will be developed for industrial and commercial adhesives and sealants products sold in Canada with planned implementation in the 2024-2028 timeframe. The regulatory requirements would be based on the OTC Model Rule 2006 – Adhesives and Sealants and ECCC may also take into consideration some elements of California’s South Coast Air Quality Management District’s Rule 1168 – Adhesive and Sealant Applications (PDF) either for 2017 or for 2022.

CPCA gathered technical feedback from its recently formed ICAS sub-committee and will submit technical comments to ensure the team of regulators adopts a measured approach in the coming months.

Lower VOC Limits for Automotive Refinish Regulations

ECCC completed a regulatory review of the *Automotive Refinish (AR) VOC Regulations* in early 2023, as per the *2018 Treasury Board Secretariat Cabinet Directive on Regulation*. The federal Government had previously confirmed its intent to adopt OTC MERR 2011. Issues were identified through the internal review such as discrepancies of the regulatory requirements between the AR Regulations and the jurisdictions of Canada’s trading partners and Category 14 enforceability issues related to the regulatory amendments. This revision of the *Auto Refinish VOC Regulations* will admittedly lead to minimal VOC emission reductions and thus CPCA questioned the need to formally adopt OTC MERR 2011 in Canada. On August 4, 2023, ECCC engaged ChemInfo to study VOCs in AR paint products through a survey. Officials will use the study results to inform the development of amendments to the VOC concentration limits for AR VOC regulations with a particular focus on 5 product categories. ChemInfo will specifically collect information on Primer Sealers, Adhesion Promoters, Truck Bed Liner Coatings, Single-stage Coatings, and Surface Cleaners. **The survey was**



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finalized and sent to all AR members in October 2023. The objective was to ensure that the regulations continue to be appropriate, effective and achieve intended policy objectives. The next step will be a stakeholder consultation in the Spring or Fall 2024. The new regulations will be proposed in 2025.

Final VOC Concentration Limits for Certain Products Regulations

The *VOC Concentration Limits Certain Products Regulations* were published on January 1, 2022, and the VOC limits "Coming into Effect" date is set for January 1, 2024 (except disinfectants: January 1, 2025). These VOC regulations set VOC limits that will impact adhesives, adhesive removers, sealants and caulks, thinners, multipurpose solvents mostly sold at retail in Canada for uses in the household. No sell-through deadline was set for these products still in commerce after January 2024. Some VOC permit options had to be applied before October 1, 2023. **The deadline to submit a technical and economic non-feasibility permit expired in August.**



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Final Regulations Published Amending the HPR GHS 7th Revision

CPCA applauded Canada and the United States for moving forward on GHS Revision 7 alignment. It is always better when there is regulatory alignment in the largest trading block in the world. Canada published its final regulations in December 2022. The final date to comply for all suppliers and employers is **December 15, 2025**. Meanwhile, OSHA still has to publish its own ruling, which was originally expected to be published some time in Spring 2023 by Health Canada and is now seriously delayed. If this publication delay persists well into 2024, it will have the potential to create some misalignment with Canada. **As such it is likely that there be differences or variances in the two countries, which will require further attention and may require suppliers to prepare two sets of labels or safety data sheets or both, to market the same product in both Canada and the U.S.** While OSHA has been reluctant to disclose any definitive timeline it is a major development and the final ruling should take effect at least one year later following this publication, if not more. But this may still mean a final ruling will be published in late 2024 and coming into force just before December 2025 at the earliest.

Health Canada's final GHS Revision 7 amendments to the *Hazardous Products Regulations* (HPR) relate to the adoption of a new hazard category for non-flammable aerosols and new subcategories for Flammable Gases, and the modification of Schedule I to update related elements in the SDS. A new physical hazard class, *Chemicals Under Pressure*, was also approved from Revision 8. The new regulations will impose costs on suppliers who sell or import hazardous products intended for workplace use, handling or storage that were estimated at \$53.8 million.

It dealt with the following:

- Discussions on alignment between Health Canada and OSHA;
- Classification of hazardous products/chemicals;
- Required SDS toxicological information for hazardous product/hazardous chemicals;
- Prescribed concentration ranges to protect CBI/Trade secrets;
- Small package labelling provisions for containers;
- Labelling requirements for shipped containers;
- and combustible dusts hazard label.

Health Canada Consults on Removal of 'Consumer Products Exemption' (CPE) from the *Hazardous Products Act*

In March 2022, Health Canada finally published a report from their online survey and multi-stakeholder workshop on the issue of 'removing' the existing consumer product exclusion in the *Hazardous Products Act*. This CPE removal had the potential to be extremely costly for industry if the exclusion forced all consumer chemical products to be re-labelled according to the WHMIS standard when products are used in the workplace. It would also create consumer and retailer confusion with the new SDS/labels without proper stakeholder discussions and proposals for the adoption and implementation of GHS for consumer products. **CPCA met with senior Health Canada officials in November 2021 to raise concerns related to their Position Paper and to reiterate comments discussed with Health Canada earlier.** CPCA participated in both forums to advocate for the retention of the exclusion for manufacturers, thus retaining the status quo. Or, as a secondary option, adopt a modified proposal to largely align with OSHA in the United States. CPCA was assured by Health Canada officials that if an amendment was to be made to the HPA, there will be a thorough cost-benefit analysis done. CPCA received the proposal in December 2022. The government officials pre-consulted on their intent to completely remove the current CPE from the *Hazardous Products Act* (HPA) and regulations, but without requiring any GHS labels. **Officials then proposed that suppliers of consumer products be exempted from complying with the WHMIS**



label requirements but would have to produce SDS upon employers' or consumers' request at the point of sale. A more formal proposal will follow in late 2023 or in the first part of 2024. A cost impact analysis will also be developed.

Health Canada's New Stakeholder Engagement Plan for Workplace Hazardous Products

In the fall of 2022, Health Canada consulted stakeholders (labour and industry) on its plan to change the structure and former function of the CIC under WHMIS, which will cease to exist as it always leads to lack of consensus. Instead, it will be replaced by flexible adhoc bilateral and multilateral discussions between the WHPP and

a varied composition of stakeholders. **While this seemed like a reasonable approach that could work, there were some concerns that CPCA formally expressed. For example: How will the HC database be built for the outreach? Will Health Canada be transparent with respect to communicating the information exchanged during the multilateral/ bilateral consultations with all stakeholders? Will everyone have access to all meeting minutes, reports, newsletters, and non-CBI documents shared with Health Canada during the consultation process? CPCA's main issue with the WHPP adopting such a model with industry, labour, employers, and other groups, was that there was no definitive regulatory**

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framework, workplan or list of topics, projects, or regulatory proposals with clear yearly, 2-year, 5-year timelines that stakeholders would be provided ahead of time. The second large WHPP multistakeholder workshop is expected in Spring 2024. Industry is invited to propose topics.

Removal of the 'True Copy Label Requirement' in the *Hazardous Product Act*

The amendment of *Hazardous Product Act* to eliminate the true copy label requirement was not included in *Bill S-6 on Regulatory Modernization* published in 2022. Thus, Health Canada's dossier, which was mainly built on CPCA's previous comments and was submitted to the Treasury Board, was once more ignored. Despite many calls from industry, including CPCA, it was not included in Bill S-6. Bill S-6 proposed 46 changes to 29 Acts, yet it is difficult to understand why there was no movement on the removal of the 'true copy label requirement' from the *Hazardous Product Act*, as it does not bring any health benefit, just significant administrative costs. **It is difficult for manufacturers of chemical products to understand the rationale behind this unique Canadian HPA requirement. It appears that labour groups, who have been lobbying to retain it without any relevant data to support such a request, have succeeded.**

CPCA will pursue this issue further with Health Canada as to what exactly prevented the amendment from being made. There is ongoing work at Health Canada to require a 30-year retention period for the SDS. CPCA hopes it is possible it may be included in the next *Annual Regulatory Modernization Bill* (ARMB) to speed up the amendment process. As Health Canada has proposed amending the HPA to remove the consumer products exemption, this would provide them with the opportunity to formally amend the Act to include other administrative amendments, such as removing the true copy label requirement and lengthening the retention period. It could still recognize stakeholder interest in reviewing true copy requirements. **Health Canada just informed industry that it will be gathering additional data and be consulting with other federal, provincial, and territorial partners in late Fall 2023.**



Federal Government Seeking New Labelling Requirements for Consumer Chemical Products

In July 2023, Health Canada published a Notice of Intent (NOI) proposing new requirements for consumer chemical products under the *Canada Consumer Product Safety Act* (CCPSA). The deadline for industry to respond was extended to October 20, 2023. CPCA collected extensive comments from industry members to address very serious concerns with such an approach. Government noted that many substances found in consumer chemical products have been linked to *Human Health Hazards of Concern* (HHHOCs) such as carcinogens, mutagens, and reproductive toxicants and invited all stakeholders to comment on the proposal to introduce new requirements for HHHOCs in consumer chemical products under the CCPSA. The NOI clearly stated why the federal Government is moving in this direction and it is because Environmental NGOs demanded it: **"In response to growing public interest by certain stakeholders including the Canadian public and non-governmental organizations (NGOs), the Government of Canada has made several commitments to strengthen the disclosure of chemicals on labels for consumer products."** The proposed new requirements would include classification criteria for HHHOCs, more information disclosure to take action based on information from stakeholders and requirements for additional protections. The expected statements include: Danger or Warning; hazard statements e.g., May cause cancer; precautionary statements such as instructions for safe use and first aid; and ingredient disclosure requirements.

A cost-benefit analysis of the proposal may be required for an amendment to the CCCR, 2001 or for a new regulation. Existing requirements of the CCCR, 2001 will also remain in place. Consideration may also be given to an alternative approach could fully replace the CCCR, 2001 with a 'risk-based' GHS framework for classification and information disclosure. **The proposal to classify HHHOC in consumer products will apply to all paint, adhesives, sealants, and elastomers used in consumer products within the scope of the current CEPA**, which include substances or mixtures supplied in containers, and classified in a HHHOC category or sub-category according to the GHS classification criteria. **Adopting the new GHS framework for consumer products will be a massive undertaking and if this proceeds it will be totally misaligned with the US, where such measures are not even yet on the radar.**

Enhance Compliance Mitigate Risk

The CASE industry's comprehensive source for regulatory compliance in Canada

CPCA is making improvements to help members manage regulatory issues on the Canada CoatingsHUB and expected to Go-Live at the end of **Q1, 2024**.

Improvements will include:



Track a Substance

Real-time tracking of CASE chemicals through the regulatory review process.



Secure and Reliable Data

Clear data to support product formulations, compliance, and government mandates.



Leverage Resources

Timely and valuable data to help companies retain their market access.



EHS Compliance

Worker safety first! Get emerging best practices in the evolving EHS environment.



ESG Compliance

Stay on the cutting edge of environmental and social governance.

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Book a Demo

Behind the Curtain of Focused Advocacy

“ The non-stop avalanche of new regulatory requirements makes it hard to sort and prioritize compliance activities, and the CPCA HUB offers a convenient centralized place from which to track, understand, sort, organize, and plan. It is a great tool for fulfilling our regulatory obligations. — Michel Hachey, MG Chemicals

To ensure a **'whole of industry'** approach works requires coordination with a focused and sustained advocacy plan. Current and emerging regulatory issues impacting the CASE industry are addressed by CPCA via a comprehensive digital database directly addressing the challenges and actions being taken for more positive regulatory outcomes. Details on those actions are available on the Canada CoatingsHUB. Companies must have immediate access to this important source of information on proposed regulatory changes so they can 'act' before regulations are cast in stone. It is best that the whole of industry act in unison with a common front. **There is strength in numbers.**

More importantly companies must engage and support ongoing data gathering to strengthen CPCA's formal industry recommendations to Government as the first line of advocacy. Being part of industry stakeholder groups will convey both the importance of getting regulations right at each point in the process, while keeping an eye to more sustainably sourced materials and the innovation needed for improved formulations

over the long term. Time is often the difference between success and failure for both Government initiatives and industry success, or rather success as it relates to economic growth and productivity for the benefit of Canadians.

The CoatingsHUB is a key part of CPCA's advocacy effort. Member companies, now with more than 600 users, can now access 2,500 industry resources on 16 key issue categories representing 2,947 chemicals used in thousands of products. These are all closely tracked as to the status of existing requirements and the evolving regulatory changes. The Hub provides:

- A personalized regulatory dashboard
- Industry resources covering 16 critical issue categories
- Real-time search and tracking of CASE chemicals in commerce by CAS-RN[®]
- Compliance alerts ensuring deadlines are never missed on existing and pending regulations and government-mandated calls for industry data
- Up-to-date regulatory information such as formal position papers, aggregated industry submissions, member bulletins, formal consultation letters, etc.



Canada's regulatory development process is getting more complex. The CASE industry trusts the CoatingsHUB to support their compliance efforts. **A recent CPCA survey revealed that 77%, at least 8 out of 10 HUB users, are fully satisfied with their digital database experience.**

The CASE industry is already very focused on sourcing more sustainably sourced substances for manufactured products and reducing its

carbon footprint. It is also in full compliance with all existing regulations for 'best in class' product stewardship. Companies must keep a close eye on evolving regulations in support of their customers continued economic success as well as helping them reduce their environmental footprint.

In the end, strong data equals better outcomes for the CASE industry and its customers in Canada.



Serious Concerns with Draft PFAS Report

CPCA provided the CASE industry's initial comments on the federal Government's *Draft State of PFAS Report* with hopes the final decisions on the 'draft' will lead to a consistent and practical definition for Risk Assessment and Risk Management of these substances in Canada.

CPCA has long supported a strong risk-based approach to chemicals management under the federal Government's Chemical Management Plan (CMP). Integral to the CMP is the legitimate process for prioritization of 'chemicals of concern' thereby ensuring all available data points are collected from all 'credible' scientific sources. Substantive data will ensure a sound and comprehensive Risk Assessment is completed before moving forward with Risk Management actions such as regulations, bans and other use restrictions. In fact, of the 4,300 chemicals assessed under the CMP to date, more than 1,552 are used literally in thousands of CASE products. **We trust the same evidence-based rigour will be applied in the case of PFAS risk assessment going forward.** The proposed regulatory changes, some of which are noted in this edition of INSIGHT, are just a few of the new requirements that will impact all companies doing business in Canada, whether manufacturers, suppliers, distributors, equipment suppliers and those businesses relying on the industry. The work ahead will be time consuming, challenging and will require significant engagement by all stakeholders with common interests. The more support behind those initiative, the better the outcomes will be.

Exclusion of Fluoropolymers

Some PFAS compounds, more especially fluoropolymers, are essential functional ingredients for CASE products used to ensure strong, stable, inert, and long-lasting product performance required to protect vital infrastructure like bridges and hundreds of critical components in airplanes, essential medical equipment and anti-bacterial surfaces in hospitals and schools. Fluoropolymers are polymeric molecules that are too large to crossover in biological membranes and therefore do not present significant concerns for toxicity or bioaccumulation. **Fluoropolymers do not present human health impacts associated with other legacy PFAS chemicals like PFOA or PFOS or other long-chain PFAS, nor can they transform into those substances and nor can they ever become mobile.** Fluorinated chemistries in CASE products are often necessary to meet high performance standards that enhance an objects durability, reducing the need for other raw non-renewable materials. The resulting benefit is lower energy consumption while extending the lifecycle of both renewable and non-renewable resources. For those reasons regulatory authorities in Europe and other jurisdictions have classified fluoropolymers as "**polymers of low concern**". CPCA strongly supports the exclusion



of fluoropolymers from the currently proposed scope of PFAS assessment and that it not be added to Schedule 1 of CEPA (2023). The goal must be to keep the regulatory focus strictly on PFAS sub-classes based on their actual potential to cause negative effects on the environment and human health.

Issues with the PFAS Definition

CPCA would support a consistent and science-based definition of PFAS, which can be adopted by all levels of Government and organizations responsible for their safe use. Compounds with only one fluorinated carbon should be excluded from the PFAS definition for the reasons noted herein and as detailed in CPCA's formal submission. **CPCA argues that it is critical for the federal Government to establish a workable definition of PFAS similar to the UK definition with a narrow focus on substances that actually degrade, not 'possibly' degrade.** As such, it would only need to target a limited number of PFAS substances or priority sub-classes determined to negatively impact health or the environment. This should be 'the' established process before any PFAS is listed on Schedule 1, Part 1, or Part 2 of CEPA (2023).

Intentional Use of PFAS and Possible Alternatives

The federal government's initial focus should only be on 'intentional' uses of 'degradable' PFAS. This is especially important if Government wishes to move forward on a credible and more efficient 'grouping approach' for the Risk Assessment and Risk Management of PFAS. Moreover, it must not only rely on the development of risk management instruments for various sub-classes of PFAS without fully evaluating the existence of

cost-effective and less harmful alternatives. PFAS are contained in a number of critical raw materials, which will be in great demand for a more sustainable future.

Alternative assessment must also be done in a rigorous way as many potential alternatives are still under development and not available to all industry sectors.

Further, some may be subject to unfounded marketing claims that are unproven in new product formulations and finished goods. Significant time and costs associated with identifying substitutes, and in some instances non-fluorinated substitutes, may in fact have a greater negative environmental impact over the lifecycle of a product, not less (regrettable substitution). This is critical for all industry sectors to note and for Government to appreciate.

CMP's Scientific Risk-Based Approach Must be Applied to PFAS

With regard to the **Draft State of Science Report**, it is unclear how the Government could justify the hasty publication of this report by simply invoking the use of the precautionary principle without preconsulting impacted stakeholders. This is not the chemical assessment approach for which Canada has been widely lauded over the past 20 years. Some have said it puts the cart before the horse, and they are correct.

Should it be 'scientifically' proven that all 4,700 PFAS pose 'unacceptable risks' and potentially dangerous, the question then is: can they be realistically risk assessed expeditiously at various stages of assessment?

Many of the past Risk Management actions under the CMP were not always to the benefit of industry, but industry understood and respected the scientific rigour



applied in gathering such robust scientific data **before** rendering final decisions. In the case of the **Draft State of PFAS Report** the opposite is true. For some reason a close-to-final 'emergency' decision was taken by the federal Government without any 'substantive scientific data' to support it. Why was such an unusual decision taken when in fact not all PFAS are toxic and/or bioaccumulative? In CPCA's formal submission on this subject, it quoted the highly respected Dr. Janet Anderson, who recently noted: **"It's clear that for a chemical class as diverse as PFAS, a scientifically rigorous approach to risk assessment is needed. We need to acknowledge that "risk assessment" is not a 'one-size fits all' tool and the context matters, and that effective communication of uncertainties and data limitations is required."**

Conclusion

The Draft PFAS proposal underestimates the time and expense to identify substitutes, to modify all aspects of formulated products and then bring them to market, while *assuming* a substitute is available. Formulated products do not have "drop-in" substitutes. All aspects of a formula have been developed and tested for optimum performance, often while minimizing environmental impacts. It all takes time and requires a rigorous, scientific risk-based approach.

Much of the industry's new product development is now focused on increasing innovation and seeking more sustainably sourced inputs in support of strong commitments to move toward net-zero and other ESG targets. All these efforts require time and increasing costs, but the commitment remains strong in the industry. Regulatory uncertainty as suggested by this current approach on PFAS, if it proceeds more broadly, will negatively impact trade flows, especially with Canada's largest trading partner, the United States, from which almost half of CASE products are manufactured in or shipped to Canada.



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CPCA Online Coatings**TECH** Course

Delivering Excellence in Education to the Coatings Community

For as long as it has been in existence, the coatings industry has required a high level of education. Science, Technology, Engineering and Mathematics (STEM) learning is essential to achieve success in the CASE industry. CPCA believes that coatings innovation is integral to our future. CASE sector companies spend hundreds of millions of dollars in R&D on new innovative products and processes annually. CPCA encourages members to maximize their learning potential through the Coatings**TECH** Online Diploma Course. CPCA's Diploma in Coatings Technology is available to students in Canada and around the world as a three-semester course. Participants can work at their own pace with easy-to-use e-learning training tools to gain the knowledge needed for career advancement in the coatings industry. The three semesters can be completed in as little as eighteen months, or less, if desired. Participants can choose to take one or all three semesters and receive a Diploma in Coatings Technology once all three are completed. The three semesters of the course are:

- Semester 1: Raw Materials
- Semester 2: Architectural Coatings
- Semester 3: Industrial Coatings

Participants can choose to take one or all three semesters and receive a Diploma in Coatings Technology once all three are completed.

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The Power of Industry-Government Collaboration

CPCA Working Groups & Committee Members Creating Change

CPCA's work relies on proactive engagement and support from industry. Many technical committee members provide real-world data, which ensures legislative and regulatory changes are fair. The more member data there is, the better the outcomes for the CASE industry in Canada.

Paint and Coatings Working Group

While all CPCA technical committees are essential to successfully advocate on behalf of the industry, the Paint and Coatings Working Group (PCWG) is unique. It includes CPCA members working on various legislative and regulatory files of importance to the CASE industry along with federal officials from various Government departments including Environment, Health, Industry and Trade. Frank and open dialogue is necessary if you operate in the highly regulated chemical sector on issues in four critical areas: Chemical Management, Air Quality & Environment, Health & Safety and Product Stewardship.

- Taking stock and reviewing the status of chemical regulations vis-à-vis industry
- Working through technical challenges for better regulatory outcomes for industry and government
- Strong attendance with collaboration of 60+ industry-government representatives over a full day twice a year
- Clearly stated action items established for follow-up by both industry and government

Industry Coordinating Group (ICG) for CEPA

The ICG is important for all chemical sectors in sharing information and views on current and developing legislation for fully informed and transparent views on government decision-making.

- Focused on chemicals in commerce risk-assessed under the federal Chemicals Management Plan
- Comprised of more than 20 industry associations.
- Ensuring collaboration and transparency in chemical regulation
- Focused on requirements related to both existing and developing regulations

The ultimate goal is to ensure Government officials have the most relevant data to make fully informed final decisions impacting chemicals in products in Canada based on the 'weight of evidence.'

CPCA Technical Committees

Industry representatives of CPCA member companies are a critical part of CPCA's advocacy, conveying the importance of ongoing policy and regulatory development at all levels of government in Canada to ensure informed decisions on product composition.

Coatings and Adhesive Working Group

The CAWG is a joint working group of CPCA expert members and American Coatings Association (ACA) advisors along with several federal representatives and expert assessors from the Pest Management Regulatory Agency. This group supports the approval and continued use of critical biocides in the CASE industry and seeks to align decisions with the US EPA.



World Coatings Council

This group is comprised of paint and coatings associations representing coatings companies in more than 20 countries. It meets regularly to share information and work with global organizations such as the United Nations (UN), the Organization for Economic Cooperation and Development (OECD) and the International Maritime Organization (IMO). CPCA is a founding member of the World Coatings Council (WCC). Over the last several years, common issues facing the paint and coatings industry on a global

level have increased significantly. While it is always a constant challenge for each individual country to manage the myriad of domestic regulations, it has become increasingly difficult to interpret the potential impact of foreign issues from one country to the next. In 1992, in an attempt to improve communication and to coordinate industry policy on matters of international concern, the World Coatings Council was formed. The WCC meets throughout the year to discuss global issues of pressing concern to industry.

CPCA Operations

NEW Program Initiatives

Enhancing Member Services

CPCA continues its work on enhancing existing services for members as part of its work on continuous improvement.

Updating CPCA's Coatings Tech Course

New e-learning approaches for the CoatingsTECH course, which already has strong and relevant information on key aspects of the coatings industry. Created 10 years ago the course now requires updates to provide improved access and support for the student e-learning interface. It will benefit both new entrants and existing staff in the CASE sector. It will also include a new French version while ensuring ongoing updates and maintenance over the longer term that will generate increased revenues for the Association and support CPCA's continued commitment to education and training for the industry.

Enhancing CPCA's Digital Database

Adding value the Canada CoatingsHUB digital database for improved regulatory advocacy and compliance generally to improve all aspects of CPCA communications efforts. It supports the strategic priority focusing on leveraging the incredible value of the information the Association has developed and curated on its digital database for regulatory compliance. It includes a fully redesigned interface and improved functionality for members to stay on top of what matters most in managing their compliance requirements.

Integration of AI Support for Stronger Advocacy and the Digital Database

CPCA's goal is to continue to provide best in class technical data to inform CPCA's and its members ongoing advocacy to strengthen formal industry submissions and other communications related to ongoing legislative and regulatory changes. This will ensure all relevant technical data is accessed across multiple digital databases to add value for members.

Improved Marketing Website

Launching a more streamlined website, functionally separate from the CoatingsHUB but operating in unison. It will have fully redesigned interface, including technology upgrades, improved maintenance, and support over the long-term. It will have a special focus on repositioning the CASE industry's work highlighting the new narrative of a more focused and sustainable industry.

Rebranding CPCA

The Board considered new approaches in terms of a rebranding of the Association to align with the new narrative and other members of the World Coatings Council. The new name will be the Canada Coatings Association similar to the approach of the American Coatings Association and the British Coatings Federation. Since 1913 CPCA has had four names: Canadian Paint, Oil and Varnish Association (1913-1940), Canadian Paint, Varnish and Lacquer Association (1941-1966), Canadian Paint Manufacturers Association (1966-1980) and Canadian Paint and Coatings Association (1980-2013).

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CPCA's Canadian Coatings Conference

The Canadian Coatings Conference is the one time of year for the CASE industry to come together and take stock of the state of the CASE industry in Canada with a look at current regulations, new technology and innovation, and the successes and challenges related to all.

Hosted in a different city across Canada each year it offers attendees a unique blend of insights. There's nothing like being there! If you were not able to attend in 2023, we welcome you to join us next year in beautiful Montreal, so stay tuned for Conference details.

CPCA's Annual Conference & AGM in Niagara-on-the-Lake at the historic Queen's Landing Hotel. Darrin Noble, CPCA Chair and President & COO of Cloverdale Paint opened the conference highlighting the value the paint and coatings industry brings to Canadians with a strong contribution to Canada's GDP and extended a warm welcome to speakers, attendees, including the graduate students in attendance. He added that "while the coatings industry has been in the midst of "Changing Times, New Challenges" it has been the commitment and dedication of both the management

and staff of coatings companies that industry has weathered the storm." Last year he noted that the work of the association during the pandemic was viewed as pivotal in getting paint and coatings designated as an essential service by the Federal Government Department, Public Safety Canada, which was later

embraced by all Provinces for the benefit of the industry to continue manufacturing and retail operations with curbside pickup and the like. That is what associations do and can only do when members come together and support it as CPCA members clearly do. He added that, "**By definition, everything the Association does benefits the entire industry, not just the membership and the hope is that more in the industry or adjacent industries become members going forward.**" Darrin reminded attendees that change means challenge and industry embraced change in dealing with the scarcity of raw materials used in products; building resiliency in supply chains; a new focus on R&D and innovation to meet growing customer demands; addressing increasing regulatory compliance requirements; and securing more sustainably sourced products and supporting sustainability generally. The Chair called on industry to look forward as we collaborate, innovate, and create change for a strong and sustainable industry.

Business Sessions

Conference business sessions addressed some of the matters noted by the Chair. The session by **Edye Fox Abrams, Vice-president at the ChemQuest Group** looked at the post-pandemic world of coatings including supply chain conditions, R&D efforts, mergers and acquisitions, strategic planning, and the business environment overall.



Darrin Noble
Chair of the Board
President & COO,
Cloverdale Paint

“ It is always nice to reconnect with members to discuss the key issues before the industry in Canada, share thoughts with graduate students, hear from seasoned industry experts, and break bread at the lovely Chateau des Charmes at the annual Chair Award Dinner.

Gary LeRoux
CPCA President & CEO

Dr. Michael Cunningham, PhD, P.Eng., Professor of Chemical Engineering at Queen’s University dove into how we get to more sustainable products using biobased materials like algae and lignin, and what real alternatives mean for sustainability when using ‘switchable systems’ in the coatings world. Industry writ large is increasingly moving in that direction on the road to net zero and the achievement of ESG goals.

Doug Bohn, Principal at Orr & Boss, presented the numbers based on the recent Economic Impact Study completed for CPCA noting the growth in the coatings industry over the past five years with an economic impact in excess of \$20 billion annually.

Still on sustainability, **Mark Kurschner, President of Product Care Recycling** spoke about the world of paint waste recycling in Canada with unique insight in running paint recycling programs in 8 of Canada’s 10 Provinces. He noted continuing challenges in some provinces in the move from Extended Producer Responsibility (EPR) to Individual Producer Responsibility (IPR). Regardless of the regulatory hurdles, paint manufacturers in Canada have supported paint recycling for more than 25 years and still making strides with more than 20 million kilograms recycled every year in Canada, all paid for by paint manufacturers.



Dr. Michael Cunningham
Professor of Chemical Engineering
Queen’s University



Doug Bohn
Principal
Orr & Boss



Edge Fox Abrams
Vice-President
ChemQuest Group



Mark Kurschner
President
Product Care Recycling





The Keynote address was given by **Tracy Young, Senior Global R&D Director from Dow Chemical**, who shared her unique perspective on the sustainability journey in the coatings industry. She provided unique insight under the heading of, 'Coatings Sustainability: The Future is Now' noting the coatings industry has clearly been among global leaders in innovation, building new research facilities, developing new technologies, and with market-driven solutions for customers. That is the case whether it is for architectural or industrial applications. She noted that the future is moving quickly to a new, low-carbon approach to business, which will significantly change the way we do business.

Riaz Zaman, Government Affairs Counsel at the American Coatings Association, offered views of the ongoing regulatory challenges South of the border. He noted that Canada and the United States operate in a highly integrated economy and what happens in one country affects the other. He talked about the challenges and what one country can learn from the other and the need for more regulatory alignment, not less, whether it is chemical assessment, VOC limits, biocide re-evaluation, etc.

CPCA President, Gary LeRoux, provided a regulatory check-up. He noted that the 'fire hose of regulations' in Canada seemed to have been turned on high over the past two years with no end in sight for the chemical sectors. He talked about what has been done to date and what must be done to address emerging legislative and regulatory issues in the future for chemicals management under CEPA; where Canada is headed with new, lower VOC limits that may be harder to meet this time; the cancelation of critical biocides used for paint preservation and its impact on alignment with the United States.

Dan Wu (Ph.D) and J. Alberto Pino Andrade, (Ms.C) from **Dow Coating Materials** provided a unique look at a new digital approach to paint formulation developed over a five-year period by Dow for ingredients used in thousands of CASE products. 'Paint Vision' will help coatings formulators simplify their formulation processes and accelerate new innovation using thousands of data points drawn from decades of R&D expertise.



Tracy Young
Senior Global R&D Director
DOW Chemical



Riaz Zaman
Government Affairs Counsel
ACA



Gary LeRoux
President & CEO
CPCA



J. Alberto Pino Andrade
DOW Coatings Materials



Dan Wu
DOW Coatings Materials

“ By definition, everything the Association does benefits the entire industry, not just the membership and the hope is that more in the industry or adjacent industries become members going forward.

Darrin Noble
CPCA, Chair of the Board of Directors

Presentations from the Students: Research Posters

In 2023 CPCA welcomed several students in the Ph.D and Master of Science graduate programs from Queen's and Western Universities. They presented a series of research posters for the benefit of those attending the conference and many wished them well and hoped to see them working in member companies in the not-too-distant future. The research presenters and poster subjects were from Queen's University, Faculty of Science, Department of Chemical Engineering, Waterborne Coatings Research - Sponsored by BASF, and Western University, Faculty of Science, Department of Chemistry, The Carbon to Metal Coatings Institute (C2MCI).



**Connor Sanders, Ph.D. Student
Queen's University**

Amphiphilic Block-Random Copolymers as Stabilizers in Emulsion Polymerization



**Dana Nanan, M.Sc. Student
Queen's University**

Alternative N-heterocyclic Carbenes for Surface Coatings



**Mark Aloisio, Ph.D. Student
Queen's University**

Preparation of Carbon-Nitrogen-based Precursors as Molecular Primers



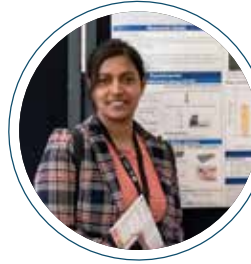
**Jessica Bosso, M.Sc. Student
Western University**

Organic-Based Thin Films for Metallic Surface Protection



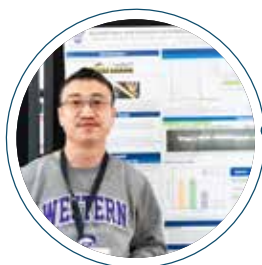
**Jeffery Collins, M.Sc. Student
Western University**

Synthesis of Organic Metal Bound Coatings



**Waruni Senanayake, Ph.D. Student
Western University**

Interactions of N-Heterocyclic Carbene with Stainless Steel Studied by Time-of-Flight Secondary Ion Mass Spectrometry



**Marshall Yang, Ph.D. Postdoctoral Associate
Western University**

Quantification and Interaction of N-Heterocyclic Carbene and Epoxy Topcoat on 304 Stainless Steel and Mild Steel

Every year CPCA features students from Universities across Canada at the Canadian Coatings Conference. For those interested please contact CPCA at info@canpaint.com







CPCA Industry Awards Recognizing Excellence & Honouring Innovation

The Chair Awards Dinner was held at Château des Charmes in Niagara-on-the-Lake. The ambiance was elegant and elevated, and conference attendees enjoyed wine tours, conversation, and a dinner that offered wine pairings, and music by Toronto's very own Lady Be Good. As the evening went on, CPCA's Board Chair and President and COO of Cloverdale Paint, Darrin Noble, presented awards to deserving industry representatives and encouraged all to enjoy what is one of the highlights of the annual conference.

And the Winners Are...

In 2023, CPCA presented its highest honour, the **Roy Kennedy Award to Fred Heitfeld** (*Sherwin-Williams*) for outstanding contribution to CPCA and for epitomizing Roy Kennedy's dedication to the Association, its members, and the industry. Fred has been a contributor to CPCA's advocacy on multiple files including paint preservation, VOCs, and GHS, among others. He is a regular participant in the Paint and Coatings Working Group meetings and has also provided valuable input on GHS worker safety, primarily to support alignment between the US and Canada, which remains a crucial issue for our industry.

The Industry Achievement Award was presented to **Rachel Laberge** (*Brenntag*); **Diane Nash** (*Axalta*); **Judy Stevens** (*Vibrantz*); **Jim Kantola** (*PPG*); **Joyce Borkhoff** (*Intertek*); **Tom Snider** (*Cloverdale*); and **Brent Jamieson** (*Axalta*). This award is presented to individuals who demonstrate exceptional achievement in advancing the interests of the industry and/or the Association.

The Industry Distinction Award was presented to **Cathy Currie** (*Home Hardware*); **David Faherty** (*Arxada*); **JF Tanguay** (*IMCD*); **Gary Regulski** (*Axalta*); and **Jeff Snyder** (*AkzoNobel*). These individuals are

recognized for their long-term contributions to the Association at the national and/or local level and have since retired or will soon do so.

CPCA also recognized several of our member companies and related associations who celebrated milestone anniversaries in 2022 or 2023. The following were awarded with a commemorative plaque for their longevity in the industry:

- British Coatings Federation – 110 years
- BYK – 150 years
- PPG – 140 years
- Cloverdale Paint – 90 years
- Mapei – 85 years
- Behr – 75 years
- Duha Group – 75 years
- Orr & Boss – 75 years
- MF Paint – 55 years

The Chair extended a warm thanks all the sponsors who helped make the event possible:





Roy Kennedy Award

Fred Heitfeld
Sherwin-Williams



Industry Achievement Award

Diane Nash
Axalta



Industry Achievement Award

Rachel Laberge
Brenntag



Industry Achievement Award

Judy Stevens
Vibrantz



Industry Achievement Award

Brent Jamieson
Axalta



Industry Achievement Award

Jim Kantola
PPG



Industry Distinction Award

Cathy Currie
Home Hardware



Industry Achievement Award

Joyce Borkhoff
Intertek



Industry Distinction Award

David Faherty
Arxada



Industry Achievement Award

Tom Snider
Cloverdale Paint



Industry Distinction Award

Jeff Snyder
AkzoNobel





CPCA Members Membres de L'ACIPR



Thanks to CPCA members for supporting the important work of the association to sustain a strong Coatings Industry in Canada.

Remerciements à tous les membres de l'ACIPR pour leur soutien au travail important de l'ACIPR en vue d'assurer que l'industrie demeure vivante au Canada.



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