

July 23, 2009

The Honourable Leona Aglukkaq, P.C., M.P.
Minister of Health
House of Commons
Ottawa, Ontario K1A 0A6

Email: Minister_Ministre@hc-sc.gc.ca

Re: Health Canada Review of the National Office of WHMIS (NOW)

Dear Minister:

The Canadian Petroleum Products Institute (CPPI) recently became aware of the Health Canada review of the National Office of WHMIS (NOW). The review includes a suggestion of substantial budget reductions in the next fiscal year. The CPPI is very concerned the outcome such a review will have on the work of NOW in light of the imminent implementation of the United Nations Globally Harmonized System (GHS).

The CPPI is the national association of major Canadian companies involved in the refining, distribution and marketing of petroleum products for transportation, home energy and industrial uses. Collectively, CPPI member companies operate 16 refineries (representing over 80 per cent of Canadian refining capacity) and supply over 7,000 branded retail outlets with transportation fuels across Canada. Our members are: BP Canada Energy Company, Chevron Canada Limited, Husky Energy Inc., Imperial Oil Limited (Products and Chemicals Division), North Atlantic Refining Limited, Petro-Canada, Shell Canada Products, Suncor Energy Products Inc., Ultramar Ltd, NOVA Chemicals (Canada) and Bitumar Inc.

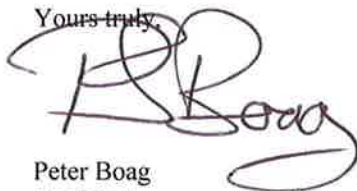
The CPPI is aware that the Canadian Chemical Producers' Association (CCPA) and the Canadian Labour Congress (CLC) have jointly communicated to you by letter about their concerns about the impact of this review and the proposed budget cuts. CPPI supports the concerns submitted by the CCPA and CLC. A copy of their correspondence is enclosed for your reference.

This is a crucial time for GHS. International efforts are underway to implement regulations for GHS to support the new right-to-know provisions and our closest neighbour and major trading partner, the United States, is about to introduce a notice of proposed rulemaking on GHS.

The CPPI does not believe it is appropriate for Health Canada to introduce a review and potentially a significant structural change in the NOW at this time. The efforts of the NOW office in preparing Canada for these new regulations will be potentially undermined; the upheaval associated with the review and budget cuts will create delay and uncertainty amongst stakeholders regarding the directions, intentions and positions of the government for regulatory development activities; and most importantly the ability of Canada to effectively align regulations with our key trading partners will be severely impacted.

Should you wish to discuss this matter further, we would be glad to meet with you.

Yours truly,



Peter Boag
President