

March 18, 2008

Executive Director  
Existing Substances Division  
Environment Canada  
Place Vincent Massey  
351 St. Joseph Blvd.  
Gatineau, Quebec K1A 0H3

Dear Sir:

The Organic Peroxide Producers Safety Division (OPPSD) of the Society of the Plastics Industry, Inc (SPI) is the principal industry organization representing organic peroxide producers in North America. We are submitting comments to you today regarding the draft Screening Assessment Reports of the three organic peroxides summarized in Canada Gazette, Part I dated January 19, 2008.

The attached document provides new analysis and data that demonstrates that none of the three organic peroxides are likely to be released into the environment and furthermore, that they are unlikely to be persistent or bioaccumulative.

Thus, it is not appropriate to designate the three organic peroxides as toxic as defined in the Canadian Environmental Protection Act. Furthermore, none of the three organic peroxides meet the criteria for persistence or bioaccumulation as set out in the Persistence and Bioaccumulation Regulations.

Given that the three organic peroxides do not meet the definition of toxic under the Canadian Environmental Protection Act, there is no justification for risk management and we are proposing that none be implemented.

Please note that the information accompanying this letter is not considered to be confidential business information. In fact, OPPSD intends to place the letter and comments on our public website, ([www.oppsd.org](http://www.oppsd.org)).

Feel free to contact us if there are any questions or if you require additional information.

Sincerely,

Lynne R. Harris  
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Vice President, Science and Technology  
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