

National Pollutant Release Inventory (NPRI)

ENGO Perspectives on Challenges & Opportunities

March 2007

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Part A: Background

The first reporting year for the NPRI was for 1993. In October 2004, Environment Canada announced to the NPRI Substances Work Group that it planned to conduct a ten-year review of the NPRI in cooperation with the Work Group. Environment Canada said that they “will develop a business case that will set the stage for the next 5-10 years” for the NPRI.¹

A Work Group Sub-Group on “Longer-Term Vision and Work Plan for the NPRI” had its first call in September 2005. The sub-group’s name was later changed to the “Long-Term Direction and Scope” Sub-Group. In late 2006, the name was again changed, this time to “Challenges and Opportunities” Sub-Group.

The work components of the review included a survey of reporters and users to obtain their views on successes and problems with NPRI, development of scenarios for changes to the NPRI, and a broad consultative workshop. In cooperation with the sub-group, Environment Canada developed and issued a terms of reference for a consultant for the survey. Originally this was to have been posted in late 2005 but it wasn’t posted until April 2006. Because of a series of contractual problems, the survey still has not been carried out. Originally, the broad workshop was to have been carried out in the spring of 2007 but because the survey had not yet been conducted, the workshop was postponed to the fall of 2007. The survey still has not been carried out and no plans have been made to hold the workshop in the fall of 2007.

Part B: Outstanding Issues

1. The NPRI Record: ENGOs believe that the NPRI has an excellent record – especially over its first eight years. The program expanded in a very fruitful manner based on its founding principles and was a model for stakeholder involvement.

However, over the past several years the situation has been dramatically different. The development of NPRI has stalled with an ever-expanding list of potential substances on the waiting list, but not brought to a decision. In one significant way, NPRI has taken a dramatic step backwards: the failure to put greenhouse gas reporting under the one-window approach of the NPRI. The consultation process has also deteriorated. In sharp contrast with the early years of NPRI, Environment Canada appears to have reduced its

¹ Slide Deck, *The National Pollutant Release Inventory 10 Year Review and Future Direction*, October 5-6, 2004, Montreal, Quebec.

commitment to NPRI and has, as a result, not provided the clear direction or sufficient resources to do the task.

2. Slow Progress: We have been alarmed at the slow progress on the review. It was an entire year after Environment Canada announced the review before a Work Group sub-group had a conference call on the topic. To make matters even worse, the issues survey has been repeatedly delayed and still not carried out. This has delayed all activities of this important review. We are dismayed at the needless delays associated with issuing and carrying out this contract.

3. Who is “client” for Review?: Throughout its 2004 presentation on the planned review, Environment Canada used the term “client.” When government bodies use the term “client,” they are putting their emphasis on the concerns of those who are being regulated – those who must report under NPRI. Environment Canada say that they are including public users as “clients” as well, but this use of the business word “client” means a movement away from public service and the protection of the environment, which should be the dominating criteria for Environment Canada’s actions

4. Focus of Review: The phrases commonly used by Environment Canada and the polluters to describe the purpose of this review are “streamlining” and “burden reduction.” We have constantly had to fight to keep the focus from being overwhelmingly or solely on “streamlining.” For example, the first e-mail from Environment Canada to set up a conference call stated as its subject “Conference Call: Sub-group on NPRI Streamlining.” In the body of the message it said: the purpose of the sub-group is “to take stock of the NPRI and explore how it can be streamlined.”² Over the past two years we have had to repeatedly push to try to reduce this bias.

5. Scope of Sub-Group Work: Originally, Environment Canada had intended to include issues with VOCs and CACs in the work of this sub-group. In February 2007, the Work Group said that these items should be removed from the work of this sub-group. We support that decision.

Part C: ENGO Position & Recommendations

- We support conducting a review of NPRI, which should have the intent of revitalizing the NPRI program and taking it a dramatic step forward towards achieving its goal of community right-to-know.
- The Minister should make an unequivocal statement that he is committed to an ever stronger and more comprehensive NPRI and that the program will not be weakened in any way as a result of the review.
- The endless series of delays in getting this review seriously underway must come to an immediate end.
- The revitalization of the NPRI should focus on expanding the information available to the public by making changes such as adding more substances and adjusting thresholds so that a greater proportion of polluters have to report.

² E-mail dated August 29, 2005.