

## COMMUNICATING HAZARDS UNDER CANADA'S E2?

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### WHAT IS E2?

- Environmental Emergency Regulations, 2016
- Imposes extraordinary obligations on facilities with substances representing unacceptable hazard to EHS

### WHAT ARE THE HAZARDS?

- Carcinogenicity;
- Corrosiveness;
- Inhalation hazards;
- Explosiveness;
- Possibility of pool fires;
- Aquatic toxicity

### WHAT'S NEW?

1. Annual exercise of plan parts (with rolling 5-year completion)
2. Consolidating into 1 hazard
3. Plan with “adequate measures” for any emergency
4. Periodic reporting (double obligation with CMP?)
5. 49 new substances; and...

### PRE-EMERGENCY PUBLIC NOTIFICATIONS

6. Public notification of the:
  - a) possibility of an environmental emergency; and
  - b) the potential consequences of environmental emergency

### MANDATED CONSIDERATIONS

- Properties of substance and expected maximum storage during year;
- Commercial manufacturing, processing and other site activities;
- Affect on surrounding properties in worst-case scenario:
  - *hospitals, schools, residences;*
  - *parks, forest and sensitive lands*
  - *water sources, water bodies*

### WHAT TO SAY?

- SDS content?
- GHS pictograms?
- Dangerous Goods Warnings?
  - too little and not adequate
  - too much and an admission of unsafe operation