

**EMULSION POLYMER COUNCIL SUGGESTED CHANGES – JANUARY 28, 2004**

Suggested deletions are shown using ~~Strikethrough~~ text.

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**Instruction Insert**

**for Completing the Forms associated with the *Canada Gazette* Notice Requiring the Preparation and Implementation of Pollution Prevention Plans in respect of Nonylphenol and its Ethoxylates contained in Products**

This insert provides additional information on how to complete the forms associated with the *Canada Gazette* Notice requiring the preparation and implementation of pollution prevention plans in respect of **Nonylphenol and its Ethoxylates** contained in Products, Notice Reference Code P2NPE. Information presented in this insert complements the information provided in the *Instructions for Completing the Schedules to Canada Gazette Notices Requiring the Preparation and Implementation of Pollution Prevention Plans*, hereafter referred to as the Instructions.

This insert is intended to provide guidance only. It does not in any way supersede or modify the *Canadian Environmental Protection Act, 1999* (CEPA 1999) or any notice issued by the Minister of Environment under section 56 of the CEPA 1999 requiring the preparation and implementation of a pollution prevention (P2) plan. In the event of an inconsistency between this document and CEPA 1999 or the P2 Notice issued by the Minister and published in the *Canada Gazette*, CEPA 1999 and the P2 Notice prevail.

**Definitions:**

**NP and/or NPEs** - refers to Nonylphenol (NP) and/or all Nonylphenol Ethoxylates (NPE). This includes raw NP and/or NPEs (as a commodity chemical).

Table 1 lists CAS registry numbers for the NP and/or NPEs most commonly used in Canadian industry. This list is for **guidance purposes only, is non-exhaustive** and does not preclude NP and/or NPEs with CAS numbers not appearing on this list.

**Table 1: CAS Numbers for Most Commonly Used NP and/or NPEs in Canadian Industry<sup>1</sup>**

<b>Substance Name</b>	<b>CAS Number</b>
<b><i>Nonylphenol:</i></b>	
Nonylphenol	104-40-5
<i>n</i> -Nonylphenol (mixed isomers)	25154-52-3
Nonylphenol, industrial	84852-15-3
<b><i>Nonylphenol Ethoxylates:</i></b>	
2-( <i>p</i> -Nonylphenoxy) ethanol	104-35-8
2-(2-( <i>p</i> -Nonylphenoxy)ethoxy) ethanol	20427-84-3
<i>p</i> -Nonylphenol polyethylene glycol ether	26027-38-3
Nonylphenol hepta(oxyethylene)ethanol	27177-05-5
Nonylphenol nona(oxyethylene)ethanol	27177-08-8
Ethoxynonyl-benzene	28679-13-2
Nonylphenoxy ethanol	27986-36-3
Oxirane, methyl-, polymer with oxirane, mono(nonylphenyl) ether	37251-69-7
2-(2-(2-(2-( <i>p</i> -Nonylphenoxy)ethoxy) ethoxy)ethoxy) ethanol	7311-27-5
Nonylphenol polyethylene glycol ether	9016-45-9
Ethanol, 2-[2-(nonylphenoxy)ethoxy]-	27176-93-8
Nonylphenol ethoxylate	37340-60-6
Poly(oxy-1,2-ethanediyl), alpha-(2-nonylphenyl)-omega-hydroxy-	51938-25-1

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Substance Name	CAS Number
Nonylphenol ethoxylate	68412-53-3
Poly(oxy-1,2-ethanediyl), alpha(isononylphenyl) omega-hydroxy	37205-87-1
Poly(oxy-1,2-ethanediyl), alpha(nonylphenyl) omega-hydroxy, branched	68412-54-4
Poly(oxy-1,2-ethanediyl), alpha(4-nonylphenyl) omega-hydroxy, branched	127087-87-1

<sup>1</sup> Guidance of CAS registry numbers to be used in the calculation of the NP and/or NPEs reduction objective (Subsection 3(1) of the Notice).

**Derivatives or salts of NP and/or NPEs** – Substances derived from NP and/or NPEs which may have the potential, through their degradation, to produce NP and/or NPEs.

Table 2 lists CAS registry numbers for derivatives or salts of NP and/or NPEs most commonly used in Canadian industry. This list is for **guidance purposes only, is non-exhaustive** and does not preclude NP and/or NPEs salts and derivatives with CAS numbers not appearing on this list.

**Table 2: CAS Numbers for Most Commonly Used NP and/or NPEs Salts and Derivatives in Canadian Industry<sup>1,2</sup>**

Substance Name	CAS Number
<b><i>Derivatives or Salts of Nonylphenol:</i></b>	
Phenol, dinonyl	1323-65-5
Phenol, nonyl-, barium salt	28987-17-9
Phenol, nonyl derivatives	68081-86-7
Barium, carbonate nonylphenol complexes	68515-89-9
Phenol, nonyl-, phosphite <sup>a</sup>	26523-78-4
Phenol, nonyl derives., sulphides	68515-93-5
<b><i>Derivatives or Salts of Nonylphenol Ethoxylates:</i></b>	
Poly(oxy-1,2-ethanediyl), alpha-(nonylphenyl)-omega-hydroxy-, phosphate	51811-79-1
Ammonium salt of sulphated nonylphenol ethoxylate	9051-57-4

<sup>1</sup> Due to the potential, through their degradation, to produce NP and/or NPEs, these products are not recommended as alternatives to NP and/or NPEs (Paragraph 3(6)(b) of the Notice).

<sup>2</sup> These substances should not be included in the NP and/or NPE reduction calculation.

<sup>a</sup> Additive in plastics and polymer manufacturing – typically contains free NP as an impurity at 1 to 3%.

**Raw NP and/or NPEs** - refers to nonylphenol and/or its ethoxylates as a commodity chemical, and not contained in any formulation or final product.

**NP and/or NPEs in Formulations** - refers to any mixture of substances that includes NP and/or NPEs.

**NP and/or NPEs in Final Products** - refers to any product, either in bulk or packaged, that contains NP and/or NPEs as an ingredient.

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**OP and/or OPEs** - refers to Octylphenol and/or all Octylphenol Ethoxylates. This includes raw OP and/or OPEs (as a commodity chemical) and OP and/or OPEs contained in formulations and as part of final products.

Table 3 lists CAS registry numbers for the OP and/or OPEs most commonly used in Canadian industry. This list is for **guidance purposes only, is non-exhaustive** and does not preclude OP and/or OPEs with CAS numbers not appearing on this list.

**Table 3: CAS Numbers for Most Commonly Used OP and/or OPEs in Canadian Industry<sup>1, 2</sup>**

Substance Name	CAS Number
<b><i>Octylphenols:</i></b>	
Phenol, 4-octyl	1806-26-4
Phenol, octyl	27193-28-8
<b><i>Octylphenol ethoxylates:</i></b>	
Poly(oxy-1,2-ethanediyl), alpha-(octylphenyl)-omega-hydroxy-, branched	68987-90-6
Polyethylene glycol octylphenol ether	9002-93-1
Ethoxylated octylphenol	9036-19-5

<sup>1</sup> Due to their similar toxicological properties to NP and/or NPEs, these substances are not recommended as suitable alternatives to NP and/or NPEs (Paragraph 3(6)(b) of the Notice)

<sup>2</sup> These substances should not be included in the NP and/or NPE reduction calculation.

**Soap and Cleaning Products** - refers to all products (powder, liquid, tablet or other form) containing NP and/or NPEs as an ingredient that are used for industrial and institutional, household, or other cleaning. For example, this includes but is not limited to laundry detergents, dish detergents, dishwasher detergents, hard surface cleaners, disinfectants, polishes, general purpose cleaners, toilet bowl cleaners, deodorizers, air fresheners, rug and carpet cleaners, metal cleaners, vehicle cleaners, etc.

**Textile Wet Processing Aids** - refers to all processing aids products containing NP and/or NPEs as an ingredient that are used in textile wet processing. ~~Environment Canada considers wet processes to be those textile manufacturing or producing processes that result in the discharge of use~~ significant quantities of water. The pollution prevention planning requirements target the processing aids for the ~~following~~ textile processes, considered to be wet processes: scouring, neutralizing, desizing, mercerizing, carbonizing, fulling, bleaching, dyeing, printing, finishing and any other wet process. Please see definitions described in Table 4 below except when those processes involve the use of water-based products (e.g., products based on emulsion polymers) that are not intended to be used in conjunction with large quantities of water and/or associated with the discharge of a waste water stream. of each wet process as defined in the supporting document to the Priority Substances List Assessment carried out on textile mill effluent<sup>†</sup>.

**Table 4: Summary of Textile Wet Processes Definitions**

~~<sup>†</sup>Supporting document for Textile Mill Effluents, Government of Canada, Environment Canada, Environment Protection Branch Atlantic Region, 2000~~

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<b>Wet Process</b>	<b>Description</b>
Scouring	An alkaline treatment for removal of natural fats, waxes, proteins, dirt, oil and other impurities.
Neutralizing	The process of raising or lowering the pH of textiles to near neutral after acid or alkali treatments.
Desizing	The removal of stiffening materials (sizes) from applied yarns or fabrics.
Mercerizing	A process that chemically increases the tensile strength, luster, dye affinity, and abrasion resistance of a fabric.
Carbonizing	A process of adding an acid solution and heat, to remove plant matter from wool.
Fulling	The washing of a wool textile in a thick soap solution, to compact and soften the wool.
Bleaching	A chemical treatment to improve the whiteness of a textile.
Dyeing	The addition of dyes or pigments in an aqueous solution to change the colour of the textile. <u>This is not intended to include pigment based pad dyeing as the emulsion polymer binder creates a structure that does not release NP/NPEs* and these processes are not associated with the discharge of significant quantities of water.</u>
Printing	A localized dyeing process in which a dye or pigment is applied to the fabric in a design. <u>This is not intended to include pigment based screen printing and other pigment based printing materials using emulsion binders as these tend to create a structure that does not release NP/NPEs* and is not associated with the discharge of significant quantities of water.</u>
Finishing (wet)	The addition of a variety of finishing agents in a solution to improve the appearance, texture, and performance of the fabric. <u>This is not intended to include emulsion polymer based textile coating products. Hand builders and fabric stabilizers containing emulsion polymers and compounds with emulsion polymers are not considered textile wet processing aids* as these are not used in processes involving the discharge of significant quantities of water.</u>

\*Scientific studies reviewed by Environment Canada have shown that emulsion polymers and products containing emulsion polymers do not release NP/NPEs in any statistically significant environmental amounts even when these fabrics/fibers are further processed with water cycles, aqueous systems, or other extractive steps.

**Pulp and Paper Processing Aids** - refers to all the processing aids containing NP and/or NPEs as an ingredient used by the pulp and paper industry. For example, this includes but is not limited to de-resinating agent, wetting agent, feltwash, pitch dispersant, polymer used in coatings, equipment conditioner, flocculants, degreaser, biocide, drainage aids, etc.

**Preparation Year** - The Preparation Year is from January 1 to December 31, 2003 for all person(s) subject to the Final Notice on the date of publication. For all person(s) that became subject to the Final Notice after the date of publication, the Preparation Year is the calendar year (January 1 to December 31) that the criteria in section 1 of the Notice are met.

**Base Year** - The Base Year is from January 1 to December 31, 1998 for all person(s) subject to the Final Notice on the date of publication. For all person(s) that became subject to the Final Notice after the date of publication, the Base Year and the Preparation Year are the same. The

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information submitted for the Preparation Year will be considered the information as the Base Year.

**Who is subject to the Final Notice?**

You are subject to the Final Notice if you do one or both of the **activities** below, **and** have purchased or otherwise acquired a total of 2000 kg or more of NP and/or NPEs during one calendar year between January 1, 2003 and December 31, 2012.

Activities :

- (i) owning or operating a facility that manufactures soap and cleaning products, or processing aids used in textile wet processing, or pulp and paper processing aids, excluding those products or processing aids for export to another country; or
- (ii) importing soap and cleaning products, or processing aids used in textile wet processing, or pulp and paper processing aids into Canada, excluding those products or processing aids for export to another country;

Threshold :

If you have purchased or otherwise acquired a total of 2000 kg or more of NP and/or NPEs during one calendar year between January 1, 2003 and December 31, 2012 for the above activities, you are subject to the Final Notice. Note that this amount includes raw NP and/or NPEs, NP and/or NPEs in formulations, and NP and/or NPEs in final products.

**NOTE:** Although the reporting requirements related to NP and/or NPEs used in the manufacturing of products, and those for NP and/or NPEs imported in products have been separated, it is important to remember that when calculating whether you meet the threshold of 2000 kg of NP and/or NPEs purchased, this includes **both** the NP and/or NPEs that you have imported (including raw NP and/or NPEs, NP and/or NPEs in formulations, and NP and/or NPEs in final products), and any NP and/or NPEs that you have purchased domestically.

**In addition to “Section B: Substance Information” of the Instructions:**

**3.0 - Substance and Activity**

The substances for which you are reporting are NP and/or NPEs (see definition at the beginning of this Instruction Insert). There are two activities for which this notice is applicable - NP and/or NPEs used in the manufacturing of products, and NP and/or NPEs imported in products. If you only perform one of these activities, check the appropriate box and continue on with the rest of the sections. If you perform **both** activities, you must complete sections 3.0 through 7.0 of the Declarations and Interim Progress Reports separately for each activity.

**Part 4 Baseline Information Note c) Reporting Period**

There are two possible scenarios by which you can be subject to the Final Notice.

**Scenario 1 - You are subject on the date of publication of the Final Notice:**

This means that as of the date of publication of the Final Notice, you meet the criteria set out in the Notice and you must prepare and implement a P2 Plan. That is, in the calendar year 2003 you have purchased or otherwise acquired 2,000 kg or more of NP and NPEs for the activities specified in the Notice.

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**Preparation Year :** Your Preparation Year is January 1 to December 31, 2003. Information for this year should be inserted wherever you are asked for information from the Preparation Year. If you have been granted a time extension by the Minister, you may be required to report for a different Preparation Year. If this is the case, indicate the new year.

**Base Year :** Your Base Year is 1998, or the first calendar year (January 1 to December 31) since 1998 where you purchased or otherwise acquired 2000 kg or more of NP and/or NPEs for the following activities:

1. Manufacturing soap and cleaning products, processing aids used in textile wet processing, or pulp and paper processing aids
2. Importing soap and cleaning products, processing aids used in textile wet processing, or pulp and paper processing aids.

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If you are subject to the Final Notice on the date of publication, the following table lists the forms to be filed (mandatory and optional), the applicable reporting year(s) for each form, and the deadline for filing each of the forms.

<b>Form</b>	<b>Reporting Year</b>	<b>Deadline for filing form</b>
Declaration of Preparation (Schedule 1); mandatory	Base Year = 1998 Preparation Year = 2003	July 31, 2005
Interim Progress Report #1 (Schedule 4); mandatory	January 1 - December 31, 2006	January 31, 2007
Interim Progress Report #2 (Schedule 4); mandatory	January 1 - December 31, 2007	January 31, 2008
Interim Progress Report #3 (Schedule 4); mandatory	January 1 - December 31, 2009	January 31, 2010
Declaration of Implementation (Schedule 5); mandatory	January 1 - December 31, 2010	January 31, 2011
Request for Waiver of Factors to Consider (Schedule 2); optional	n/a	prior to the end of the time period specified in the Notice for preparing a P2 plan
Time Extensions (Schedule 3); optional	n/a	<ul style="list-style-type: none"> <li>• for preparing or implementing a P2 plan, prior to the end of the time period specified in the Notice</li> <li>• for Interim Progress Reports, prior to the deadline specified in the Notice for filing the form</li> </ul>

**Scenario 2 : You become subject after the date of publication of the Final Notice:**

This means that after the date of publication of the Final Notice, you fulfill the criteria set out in the Notice and you must prepare and implement a P2 Plan. That is, in 2003 you did not purchase or otherwise acquire 2000 kg or more of NP and NPEs for the activities specified in the Notice; however in one or more subsequent calendar years (2004 to 2012 calendar years) you have exceeded this 2000 kg threshold.

**Preparation Year :** Your Preparation Year is January 1 to December 31 of the year that you meet the criteria outlined in section 1 of the Final Notice. For example, if you become subject to the Notice because of NP and/or NPEs purchased in 2005, your Preparation Year is 2005. Information for this year should be inserted wherever you are asked for information for the Preparation Year. If you have been granted a time extension by the Minister, you may be required to report for a different Preparation Year. If this is the case, indicate the new year.

**Base Year :** Your Base Year is the same as your Preparation Year. Therefore, the year to which your reduction efforts will be compared is the same as the Preparation Year and all references to the Base Year throughout the Declaration are referring to the year you have entered as your Preparation Year. You need not enter Base Year information in the Declaration as it is the same as the Preparation Year.

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If you became subject to the Final Notice after the date of publication, the following table lists the forms to be filed (mandatory and optional), the applicable reporting year(s) for each form, and the deadline for filing each of the forms.

<b>Form</b>	<b>Reporting Year</b>	<b>Deadline for filing form</b>
Declaration of Preparation (Schedule 1); mandatory	Base Year = Preparation Year, therefore no reporting of base year data is required Preparation Year = calendar year you met the criteria in section 1 of the Notice	7 months after becoming subject to the Notice*
Interim Progress Report #1 (Schedule 4); mandatory	1 <sup>st</sup> year after your Preparation Year	13 months after becoming subject to the Notice
Interim Progress Report #2 (Schedule 4) mandatory	2 <sup>nd</sup> year after your Preparation Year	25 months after becoming subject to the Notice
Declaration of Implementation (Schedule 5); mandatory	3 <sup>rd</sup> year after your Preparation Year	37 months after becoming subject to the Notice
Request for Waiver of Factors to Consider (Schedule 2); optional	n/a	prior to the end of the time period specified in the Notice for preparing a P2 plan
Time Extensions (Schedule 3); optional	n/a	<ul style="list-style-type: none"> <li>• for preparing or implementing a P2 plan, prior to the end of the time period specified in the Notice</li> <li>• for Interim Progress Reports, prior to the deadline specified in the Notice for filing the form</li> </ul>

\* A person becomes subject to the Notice on January 1<sup>st</sup> of the year following the year that the criteria in section 1 are met.

Reporting requirements are further clarified using the following example: if you exceeded the 2000 kg threshold specified in paragraph 1(1)(b) of the Notice during the 2005 calendar year, you would become subject to the Notice on January 1, 2006 and the following reporting requirements would apply:

<b>Form</b>	<b>Reporting Year</b>	<b>Deadline for filing form</b>
Declaration of Preparation (Schedule 1)	Preparation Year = 2005	7 months after becoming subject to the Notice = July 31, 2006
Interim Progress Report #1 (Schedule 4)	January 1 - December 31, 2006	13 months after becoming subject to the Notice = January 31, 2007
Interim Progress Report #2 (Schedule 4)	January 1 - December 31, 2007	25 months after becoming subject to the Notice = January 31, 2008
Declaration of Implementation (Schedule 5)	January 1 - December 31, 2008	37 months after becoming subject to the Notice = January 31, 2009



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**4.2 - On-Site Uses**

This information is provided to assist in completing Part 4.2 in the Declaration of Preparation, the Interim Progress Reports and the Declaration of Implementation.

This part should be completed only for NP and/or NPEs used in the manufacturing of products. Indicate whether you manufactured products containing NP and/or NPEs during the Preparation Year (see above for definition) and/or during the Base Year (see above for definition). If yes for either year, enter, in kilograms, the amounts of NP and/or NPEs that you used in manufacturing of products for each year and specify how you estimated the values. In the last column of the table, indicate the “on-site activity” by explaining how NP and/or NPEs were used by your facility in the reporting year(s) (for example, an on-site activity could be “formulating soap and cleaning products”).

Note that if you have imported raw NP and/or NPEs or NP and/or NPEs in formulations, and are using this to manufacture other final products, this amount of NP and/or NPEs should be included in this part.

**4.5 - Additional Baseline Information**

**4.5.1 - NP and/or NPEs Imported in Products**

This information is provided to assist in completing Part 4.5.1 in Declaration of Preparation, the Interim Progress Reports and the Declaration of Implementation.

This part should be completed only for NP and/or NPEs imported in products. Indicate whether you imported products containing NP and/or NPEs during the Preparation Year (see above for definition) and/or during the Base Year (see above for definition). If yes for either year, in kilograms, enter the amounts of NP and/or NPEs that you imported for each year and specify how you estimated the values.

**4.5.2 - All Manufactured or Imported Products Containing NP and/or NPEs**

This information is provided to assist in completing Part 4.5.2 in the Declaration of Preparation, the Interim Progress Reports and the Declaration of Implementation.

This part should be completed for both importing and manufacturing of products containing NP and/or NPEs. Indicate whether you imported or manufactured products containing NP and/or NPEs in the Preparation Year (for the Declaration of Preparation), or in the Reporting Year (for the Interim Progress Reports and the Declaration of Implementation). Then, in the first column of the table, list each product (containing NP and/or NPEs) that you imported or manufactured.

Indicate in the second column whether each product was manufactured or imported.

Indicate in the third column the concentration of NP and/or NPEs in each product.

**5.1 - Anticipated Actions / Actions Taken to Date / Actions Taken**

This information is provided to assist in completing Part 5.1 in the Declaration of Preparation, the Interim Progress Reports and the Declaration of Implementation.

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Note that you must complete part 5.1 for each action that you anticipate doing or have taken. Also note that the actions entered in this section pertain only to the activity that you chose in Section 3.0. For example, if you are currently reporting information for NP and/or NPEs used in the manufacturing of products, the actions listed in this section will be specifically for the manufacturing of products containing NP and/or NPEs.

In the Declaration of Preparation, you are asked for the “change to annual use” anticipated to be achieved from each action. For example, if one anticipated action is that you intend to reformulate some of your products to use an alternative, the “anticipated change” is the total expected reduction of NP and/or NPEs in kilograms, due to that reformulation. In the Interim Progress Reports and the Declaration of Implementation, this value will be the total actual reduction of NP and/or NPEs in kilograms that occurred due to this particular action (i.e. the reformulation).

**Section 5.1.5 - Baseline Element(s) Affected**

In this section, you are asked to relate the anticipated change (reported in part 5.1.4) to a baseline element. If you are currently reporting information NP and/or NPEs used in the manufacturing of products (because you chose that option in Part 3.0), then the baseline element is “on-site uses”, but you are asked to use the “appropriate alphabetical label” for the baseline element and for “on-site uses”, that label is “A”. Therefore, enter “A” in this field. If you are currently reporting information for NP and/or NPEs imported in products, then the baseline element is total imports. As there is no alphabetical label for this element, leave the field blank. *For further explanation of the alphabetical labels, see part 5.1.5 in the Instructions.*

**Section 5.2 - Total Anticipated Results / Total Results Achieved To Date / Total Results Achieved**

This information is provided to assist in completing Part 5.2 in the Declaration of Preparation, the Interim Progress Reports and the Declaration of Implementation.

Complete this section only for manufacturing of products containing NP and/or NPEs. Report the total results anticipated or achieved from all actions that pertain specifically to the manufacturing of products containing NP and/or NPEs. In the first column of the table, “Type of Use” is already filled in as “On-Site Uses”. This term refers to using NP and/or NPEs in the manufacturing of products at your facility. Other types of uses have been removed because they are not applicable to products containing NP and/or NPEs.

**Section 5.3 - Detailed Information on Results Anticipated / Achieved To Date / Achieved**

This information is provided to assist in completing Part 5.3 in the Declaration of Preparation, the Interim Progress Reports and the Declaration of Implementation.

Complete this section only for NP and/or NPEs imported in products. Summarize, in kilograms, the total changes to the amount of NP and/or NPEs that you import as compared to the amount you imported during the Preparation Year and the Base Year. These total anticipated results or results achieved should summarize all actions pertaining to NPE and/or NPEs imported in products.