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Dear Ms. Cardenas-Fischer

On behalf of the Forest Products Association of Canada, I would like to thank you for this opportunity to provide comments on the Draft Guidelines on Best Available Techniques for Pulping Processes developed by the Expert Group on Best Available Techniques and Best Available Environmental Practices established under the United Nations Environmental Program (UNEP).

The Forest Products Association of Canada (FPAC) is the voice of the Canada's wood, pulp and paper industry on national and international public policy issues. As you probably know, the Canadian forest industry is a major socio-economic engine for Canada. The forest products industry employs over 1 million Canadians and is an integral part of over 1200 communities in 9 provinces. In 2002, Canadian forest industry sales were valued at CDN \$52.9 billion and over 80% of these sales were exports.

As part of our commitment to sustainability and improved environmental performance, our sector has been able to effectively eliminate POP's from our bleaching processes. The industry in Canada has been very proactive in managing the chlorinated dioxin and furan issues. The Pulp and Paper Research Institute of Canada (Paprican) is a world leader in research to understand the science of pulping processes. During the late 80's and early 90's when chlorinated dioxins and furans were first detected in pulp mill effluent, they rapidly proposed technological solutions to solve this problem. The industry adopted these new technologies and in many cases ahead of the regulations that soon followed. The federal "Pulp and Paper Mill Effluent Chlorinated Dioxins and Furans Regulations" as well as the "Pulp and Paper Mill Defoamer and Wood Chips Regulations" implemented under the Canadian Environmental Protection Act (CEPA) have been effective tools for achieving environmental protection in Canada.

In response to the request for comments on the Draft Guidelines on Best Available Techniques for Pulping Processes, FPAC has asked Paprican to provide some brief comments and I am pleased to attach these comments to this letter.

A review of the Draft Guidelines and a review of the comments provided by Paprican has led FPAC to the conclusion that the document would be easier for the reader if it were structured in a way that focuses more effectively on the heart of the matter. The elimination of elemental chlorine is the key to controlling POP's in pulp bleaching. The reader could become diverted from this key point due to the extensive peripheral text on pulping technologies and other technological options for reducing the formation and release of chlorine-containing organic substances in general rather than the persistent organic pollutants specified in Annex C and which, I understand, are the real concern of the Stockholm Convention.

In summary FPAC recommends that the Draft Guidelines on Best Available Techniques for Pulping Processes BAT document not be released in its current form. Refocussing the document as per the recommendations from Paprican will significantly increase the usefulness of the guideline.

Yours sincerely

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