ONTARIO TOXICS REDUCTION ACT
NITTA GELATIN CANADA INC.
2019 REPORT ON TOXIC SUBSTANCE ACCOUNTING SUMMARY

INTRODUCTION

In 2009, the Toxics Reduction Act (Act) and its associated regulation (O.Reg. 455/09) were promulgated as part of the Ministry of the Environment, Conservation and Parks' (MECP's) toxics reduction strategy, applicable only to manufacturing facilities with North American Industry Classification System (NAICS) codes starting with "31", "32" or "33" and facilities with NAICS codes starting with "212". Regulated substances under the Act include all substances listed in Environment Canada's National Pollutant Release Inventory (NPRI) and O.Reg. 127/01. Forty-seven substances and substance groups were listed in Table A of O.Reg. 455/09 as Phase I priority substances. Phase II of the Act requires accounting for all other NPRI substances and TRPs submitted by December 31, 2013.

Nitta Gelatin Canada Inc. (Nitta Gelatin) uses two (2) MECP Prescribed Toxic Substances requiring TRA planning and accounting. The TRA plans for the two (2) Toxic Substances were prepared and submitted to the MECP in 2011.

This 2019 annual toxic substance accounting summary has been prepared in accordance with the requirements of the Ontario TRA and O.Reg. 455/09.

TOXIC REDUCTION POLICY STATEMENT OF INTENT

At this time the facility does not intend to reduce the use of hydrochloric acid or sulphuric acid as both of these acids are intrinsic to the process and no technically and/or economically feasible alternatives were identified.

2019 TRA Annual Accounting Summary
Nitta Gelatin Canada Inc.
Toronto, Ontario

BASIC FACILITY INFORMATION

Company Name: Nitta Gelatin Canada Inc.

Contact Information:

Highest Ranking Employee: Steve Boudreau
Director of Quality & Regulatory Affairs
(416) 532-5111
s.boudreau@nitta-gelatin.com

Technical Contact: Randy Robinson
Plant Systems Manager
(416) 532-5111
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Certified Planner: Colin Welburn, M.Eng., P.Eng.
License Number TSRP0049
TRA Planner
Welburn Consulting
613-852-6003
info@welburnconsulting.ca

Facility Address: 60 Paton Road
Toronto, ON
M6H 1R8

Business Number: 121 861 645

NPRI ID: 4477

Location (of main gate) Zone – 17
625331 m E
4835380 m N

In 2019, Nitta Gelatin Canada Inc. employed about 52 full time employees (equivalent).

The NAICS codes applicable to the facility are: 311990

31	– Manufacturing
3119	– Other Food Manufacturing
311990	– All Other Food Manufacturing

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REDUCTION OBJECTIVES

Nitta Gelatin commits itself to conduct its business activities in a way that protects the invaluable global environment and contributes to society in the pursuit of human-friendly and eco-friendly manufacturing activities.

- Establish environmental objectives and targets and review them for continuous improvement.
- Innovate eco-friendly products that require less energy and reduce waste.

All employees at Nitta Gelatin will be involved in the reduction of toxic substance use, creation and releases.

No current options were identified that are technically feasible or economically feasible.

TOXIC SUBSTANCE

The site uses two Prescribed Toxic Substances:

Prescribed Toxic Substance	CAS Number
Hydrochloric Acid	7647-01-0
Sulphuric Acid	7664-93-9

TRACKING AND QUANTIFICATIONS

The method used to calculate the TRA quantifications was a mass balance approach based on purchase records.

Table 1 is a summary of reported TRA quantities for the 2019 operational year.

In the 2019 operational year, there were no out of the ordinary incidents or significant process changes at the facility.

COMPARISION OF TRACKING AND QUANTIFICATION

No changes were made in the quantification and tracking methodology for determining used, created, or contained TRA compounds in the product from 2018 to 2019.

DESCRIPTION OF STEPS TAKEN TO ACHIEVE OBJECTIVE AND ASSESS FFECTIVNESS

There were no technologically feasible reduction strategy objectives identified for the Nitta Gelatin facility and as such there was no economic feasibility study completed for the TRA compounds. There are no objectives to track or reduction targets to evaluate.

Table 2 provides a summary of the facility TRA changes and updates which took place in 2019.

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Table 1: Comparison of Quantities Reported

CAS	Substance	Description of Processes that Use or Create Substance	Reporting under NPRI Part	NPRI Threshold	2019 Used	Used 2018 - Last Reported Value	%Change	2019 Created	Created 2018- Last Reported Value	%Change	2019 Contained in Product	Contained in Product 2018 - Last Reported Value	%Change	Reason for Changes
7647-01-0	Hydrochloric Acid	Hydrochloric Acid is used as a regenerant in resin beds.	1A	10 tonne	> 10 - 100 tonne	> 10 - 100 tonne	44%	0	0	N/A	>0-1 tonne	>0-1 tonne	44%	Changes in production levels
7664-93-9	Sulphuric Acid	Sulphuric Acid is used in material preparation and for neutralization of effluent.	1A	10 tonne	> 100 – 1000 tonne	> 100 – 1000 tonne	28%	0	0	N/A	> 1 – 10 tonne	> 1 – 10 tonne	28%	Changes in production levels

Note:
MPO - Manufactured, Processed or Otherwise used
N/A - not applicable

Ranges		
	>0- 1	unit (tonnes)
	>1 - 10	
	>10- 100	
	>100- 1000	

Table 2: Changes in Quantifications, Quantities, and Plan Updates

CAS	Substance	Quantification Method(s) Used	Change in Quantification Method Used	Rationale for Using Selected Method(s)	Incidents out of the Ordinary	Significant Process Change	Objectives, Descriptions, Targets	Actions	Amendments
7647-01-0	Hydrochloric Acid	Purchase Records, mass balance	No change	Best available data	None	None	No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation.	None	None
7664-93-9	Sulphuric Acid	Purchase Records, mass balance	No change	Best available data	None	None	No reduction options were identified to be both technically and economically feasible. Therefore, no options were chosen for implementation.	None	None

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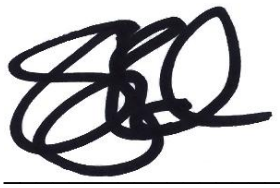
CERTIFICATION OF HIGHEST RANKING EMPLOYEE

As of May 30, 2020, I, Steven Boudreau, certify that I have read the toxic substance reduction plan for the toxic substances referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

Hydrochloric Acid
Sulphuric Acid



Steven Boudreau
Director of Regulatory & Quality Affairs
Nitta Gelatin Canada Inc.