

occasions when a province or a municipality will invoke regulations regarding these substances under their own legislation. In such cases consultation with the federal authorities hopefully would occur. Efforts would be made to coordinate the regulatory agendas. To this effect:

- (11) We recommend that national standards and guidelines be developed for classifying CFCs and related substances to ensure that regulations concerning their handling and transportation are uniform across the country.**

To ensure life-cycle management of CFCs, HCFCs and HFCs that are not used as solvents:

- (12) We recommend that "cradle-to-grave" management be applied to new CFCs, HCFCs and HFCs used for refrigeration purposes, ensuring that the producing and importing industries are responsible for tracking these chemicals to their final end use. Regulations with respect to the recovery, recycling and destruction of these substances should govern the remainder of their life cycle.**

B. RECOVERY OF HALONS

We are concerned about the continued production and consumption of halons and have recommended their accelerated phaseout. Environment Canada has proposed regulations to remove halons from hand-held fire extinguishers. Formal objections to these proposed regulations, however, have been filed by several parties, including trade associations in the United States. The Committee has acknowledged these legal objections in Recommendation (3), but would like to see them resolved as soon as possible in order that these regulations can proceed.

The largest quantity of halons and source of emissions, however, is not found in hand-held fire extinguishers but large flooding systems, similar to the familiar overhead water sprinkler systems. Most emissions from these flooding systems occur during installation when the system is tested, or during periodic tests to ensure that the system is functional. There are alternative testing methods available that use less harmful gases and we believe that those methods should be mandatory.

We also believe that halons should not be used in flooding systems except in cases where such use is deemed essential. Some high technology industries with halon flooding systems are planning to remove them. We hope that others will follow such leads, independent of any regulations or amendments to the fire code. Careful management of the existing quantity of halons using recovery and recycling technology should readily supply all the halons required for the few uses deemed essential. Once appropriate substitutes become available, however, halons should be removed from use even if the stock of halons (often referred to as a bank) is not depleted.

- (13) We recommend that the National Fire Code and the National Building Code be amended immediately and as necessary to prohibit the testing of flooding systems with halons and to prohibit the construction of**