

Greenpeace welcomes the opportunity to comment on the Government of Canada's CFC program and its publication "Preserving the Ozone Layer: a step beyond".

Greenpeace as an international environmental organization has grave concerns for the Global Ecosystem. Chlorofluorocarbon (CFC) induced ozone depletion is one of the greatest threats facing the planet today. Greenpeace has launched an international campaign to eliminate CFCs from the environment.

CFCs already released into the atmosphere have committed the Earth to ozone depletion into the 22nd Century. The result will be considerable climatic change. Radical steps must be taken to eliminate all ozone depleters, and to ensure their substitution by other substances or technologies which are benign with respect to the planet's climate.

Ozone-depleting substances are not essential to society, and are too dangerous to produce. Life on Earth cannot survive without the ozone layer's protective shield against harmful solar radiation. Nor can civilization prosper without the foundation of a stable climate.

Depleting substances are manufactured in relatively few countries by an even smaller number of large chemical corporations, which earn only an extremely small part of their profits from CFC manufacture. Governments of countries where CFCs and halons are produced carry the responsibility for protecting life on Earth by banning production immediately.

Upon careful review of the program and the documents provided by Environment Canada as well as international sources, Greenpeace can only express its disappointment with the Government of Canada's action on CFCs. Sweeping pronouncements of solemn commitment are meaningless unless they are backed up by real and strong actions.

Greenpeace would like to see fundamental changes in the Canadian approach to the CFC control plan in several areas:

- 1) Timing
- 2) Controlled compounds
- 3) Disclosure of Information
- 4) Environmentally Safe Alternatives

It is Greenpeace's hope that the Government of Canada will lead the way to international progress on this issue by following these suggestions and avoiding the pitfall of letting the polluting industry frame the debate.