

Problems in phasing out halons, whose use may be deemed essential because of safety or security applications, have led to disagreement about technically attainable targets. There is also reluctance to further limit the use of halons because of perceived economic costs, should benign and inexpensive substitutes not be found. There does seem to be agreement, however, that improved management of the present stock of halons in fire extinguishing systems and the prohibition of non-essential uses could reduce the demand for halons by 95%.

That said, there maybe an even more compelling reason for eliminating their use.

*Unlike CFCs, which release chlorine into the stratosphere, halons release bromine, a much more effective ozone depleter. It is now estimated that the two most common halons, Halon 1211 and Halon 1301, have ozone depletion potentials 15 and 30 times higher than the most damaging CFCs. (Friends of the Earth, Friends of the Earth's Proposals for Amending the Montreal Protocol on Substances that Deplete the Ozone Layer, Submission to the Standing Committee on Environment, 26 January 1990, p. 5)*

Therefore:

- (2) **We recommend that regulations be invoked under CEPA requiring a 95% reduction in halon production and consumption by 1993, and a complete elimination by the year 2000, except for those "essential uses" where no reasonably performing substitute is available.**

Beyond regulating the production and consumption of CFCs, it is necessary to control certain end uses. Banning CFCs in 1980 as a propellant in three types of aerosols (hair sprays, anti-perspirants and deodorants) reduced this use of CFCs in Canada by 85% at the time. Their application in new aerosol products, however, grew so much that by 1986 it accounted for 12% of total Canadian use. As public concern increased, aerosol manufacturers voluntarily removed CFCs from their products. This has been so effective that now aerosols account for only 1% of CFC use in Canada. Manufacturers of foam packaging are similarly removing CFCs from their products.

Regulations have been proposed under CEPA to control both non-essential uses of CFCs and of halons in small, hand-held fire extinguishers. We are concerned that these regulations have not yet been adopted.

- (3) **We recommend that the proposed regulations governing non-essential uses of CFCs and of halons in hand-held fire extinguishers (Ozone-depleting Substances Regulations No. 2 and No. 3) be implemented as soon as possible and that any portions of the regulations to which there has been no legal objection be adopted immediately.**