

## CONTROLLED COMPOUNDS

The list of controlled substances must be expanded to include HCFCs, methyl chloroform and carbon tetrachloride.

HCFCs are described as "soft CFCs" because they contain less chlorine than CFCs and are already being used in some applications, they should not be considered as candidates for intermediate technologies.

Although most HCFCs have much less ozone depletion potential than CFC 11, nonetheless, HCFCs will convey chlorine to the already overburdened atmosphere.

HCFCs are not acceptable alternatives. Even the Canadian government's own report "Preserving the Ozone Layer" indicates there are safer alternatives to HCFCs for most applications. It should also be recognized that all the applications for which HCFCs are recommended are non-essential uses and could be discontinued.

The Government of Canada should provide a clear signal to industry not to transfer to production of these chemicals. Premature investment in production facilities might dictate the acceptance of these so-called "bridging chemicals" on a more permanent basis.

Furthermore, there are reports HCFCs may be considerably more ozone depleting at certain altitudes. The possibility alone should justify their elimination as alternatives. Therefore, HCFCs should be included in Canada's CFC program and in the Protocol internationally.

The Environmental Policy Institute and the Institute for Energy and Environmental Research, in the United States, examined various scenarios for eliminating carbon tetrachloride and methyl chloroform in addition to controlled CFCs and Halons.

The study suggests that if emissions of these CFCs declined to zero by 1995, if carbon tetrachloride growth rate was in the middle of 0-3% range cited by the World Meteorological Organization, and methyl chloroform grew by less than the WMO's 8% projection, atmospheric chlorine levels would increase from 13 million tons in 1987 to over 19 million tons by the year 2000.

Alternatively, if carbon tetrachloride and methyl chloroform were phased out by the year 2000, chlorine levels would fall from 13 million tons to 1.7 million tons by the year 2000.

It is essential for the Government of Canada to ban carbon tetrachloride and methyl chloroform and to ensure these compounds are included in the international agreements on the ozone layer.