



March 26, 2020

The Honourable Jean-Yves Duclos, P.C., M.P.
President of the Treasury Board
Treasury Board of Canada Secretariat
90 Elgin Street
Ottawa, Ontario K1A 0R5

Dear Minister Duclos,

Subject: Regulatory compliance challenges presented by COVID-19

I am writing on behalf of the companies listed on page 3 to highlight the challenges the essential supply sector is presented with due to the un-coordinated social mobility limitations imposed on business in different parts of Canada. Responsible Distribution Canada represents the chemical and ingredient supply chain that services 25 sectors of the Canadian economy which support Canadian formulators and brand owners across the entire country. RDC's priority is the health and safety of our employees, affiliates, contractors and the Canadian communities that rely on the ability to fulfill our important role in the supply chain.

About Responsible Distribution Canada

RDC represents the interests of the chemical and ingredient supply chain. The association is comprised of 42 member companies that operate approximately 200 sites across Canada employ over 3,800 Canadians. Collectively, members distribute and market over 80,000 chemical and ingredient products to more than 100,000 customers internationally. As champions of health & safety, both the Association and its member companies are committed to taking every practical precaution towards ensuring that products and services do not represent an unacceptable level of risk to its employees, suppliers, customers, the public, or the environment.

Responsible Distribution Canada supports the collaborative and measured approach taken by all levels of government to prioritize the health and safety of public health workers, first responders, essential supply chain partners and the Canadian population. Responsible Distribution Canada agrees that these unprecedented measures are required to combat the pandemic and our membership is fully committed to this new reality.

Responsible Distribution Canada have established (or continue to try to establish) communications links with various levels of government to identify their specific needs as they pertain to critical chemical and drug products needed to support the needs of each jurisdiction. Notwithstanding these efforts, to meet current regulatory requirements and evolving provincial pandemic measures our members find that their



abilities to continue operations are hampered and impeded by the regulatory process. Examples included expiring permits, annual reporting, training certifications and documents requiring black ink signatures, which would otherwise result in penalties and negative consequences to the hard-earned reputation of our members.

Our entire membership has pivoted their attention to focus entirely on efforts to mitigate the spread of COVID-19 to support essential services across Canada while protecting their employees and the public. RDC recommends that governments at all levels adopt flexibility on regulatory compliance where there is no adverse health effect or where safety is not impacted. Extending existing permits and training certifications by 180-days and eliminating administrative requirements that don't compromise health and safety for the duration of this crisis would allow our members to remain nimble and responsive to ever-changing essential supply requirements that Canadians are expecting from their leaders and industry.

Yours truly,

Cathy Campbell
President

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Responsible Distribution Canada
Distribution Responsable Canada

LIST OF RESPONSIBLE DISTRIBUTION CANADA MEMBER COMPANIES

A.S. Paterson Company Ltd.	Gattefossé Canada Inc.
Alpha Chemical Ltd.	IMCD Canada
American International Chemical, Inc.	Megaloid Laboratories Ltd.
Anchem Sales	Min-Chem Canada Inc.
Anco Chemicals Inc.	Northern Nitrogen Inc.
Andicor Specialty Chemicals	Northspec Chemicals Corp.
American International Chemical	Pachem Distribution Inc.
Azelis Canada Inc.	Panther Industries Inc.
Brenntag Canada Inc.	PDI Bulk
Cambrian Solutions, a Maroon Group Company	Polaris Commercial Warehousing Ltd.
Cestoil Chemical Inc.	PVS Benson
Charles Tennant & Co. Canada	Primemax Energy Inc.
CheMIQA	Quadra Chemicals Ltd.
Chemisphere Solutions	Sodrox Chemicals Ltd.
ChemSynergy Inc.	Storchem Inc.
ClearTech Industries Inc.	Sylvite Industrial Chemicals
Comet Chemical Co. Ltd.	Thames River Chemicals
Dempsey Corporation	UBA Inc.
Di-Corp	Univar Solutions
DSN Chemical Transportation	Win Chemical Ltd.
EMCO - Inortech ULC	
Essential Ingredients Inc.	March 26, 2020
Flochem Ltd.	