

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plans for Nitric acid and Nitrate Ion each dated December 13, 2013 (Version 1.0).

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This is a Master Document which provides supporting information for Toxic Substance Reduction Plans for the following Chemical Substances: Nitric Acid CAS 7697-37-2 and Nitrate Ion* [*Per O.Reg. 455/09; "no single CAS number applies to this substance"]
NPRI and O. Reg. 127/01 Identification Numbers	NPRI ID: 4540 O.Reg. 127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	4223972 Canada Inc. SAPUTO DAIRY PRODUCTS CANADA G.P. 279 Guelph Street Georgetown, Ontario L7G 4B3, Canada
The number of full time employee equivalents at the facility	350
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	<ul style="list-style-type: none"> •NAICS 2 Code: 31 - Manufacturing •NAICS 4 Code: 3115 - Dairy Product Manufacturing •NAICS 6 Code: 311511 - Fluid Milk Manufacturing
Public contact	environmental@saputo.com
Technical contact and person who is responsible for coordinating plan preparation	Prunelle Paquette Project Leader, Environmental Affairs 2365 Chemin de la Cote-de-Liesse, Montreal, Quebec, H4N 2M7, Canada (514)328-3466 prunelle.paquette@saputo.com
The person who prepared the plan	Prunelle Paquette
Highest Ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for certification	Victor Pavlovski Plant Manager 279 Guelph Street Georgetown, Ontario L7G 4B3, Canada (905)873-1118 Victor.pavlovski@saputo.com
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	Zone 17T (NAD83) 589430 E 4833818 N

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Substances	CAS #
Nitric Acid	7697-37-2
Nitrate Ion	NA

Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility's intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

Saputo is one of the top ten dairy processors in the world, the largest in Canada, the third largest in Argentina and among the top three cheese producers in the United States.

We are committed to pursuing environmentally responsible business practices and we seek continuous improvement in our environmental performance. In doing so, we define, review and update our environmental objectives in order for our operations to be managed in compliance with applicable environmental laws and regulations, taking into consideration sound management.

More information pertaining to Saputo's commitments to EHS are available on Saputo's corporate website: www.saputo.com

Although Saputo is pursuing environmentally responsible business practices, no statement of intent to reduce the use and creation of toxic substances through the TRA process is included as part of this Plan. Saputo's current and past activities and initiatives at the Facility have resulted in the reduction of the use and creation of toxic substances and no further reduction options could be identified through the TRA process.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- Evaluate if there are any potential options for the reduction in use of toxic chemicals currently found at the Facility and establish a path forward that includes feasible reduction options;
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

Description of Why the Toxic Substance is Used or Created

Nitric Acid containing chemicals are commonly used in food processing equipment cleaning such as cleaned-in-place (CIP) and cleaned-out-of-place (COP) systems. At the Georgetown facility, the cleaning agent containing Nitric Acid is the Envirocid. These cleaning methods are an additional and mandatory mechanism of process control to enhance the ability to better clean and sanitize production equipment to a greater degree of food safety and quality assurance. Cleaning operations must be performed strictly according to a carefully worked out procedure in order to attain the required degree of cleanliness. This means that the sequence must be exactly the same every time.

Nitrate Ion is then released from the neutralization of the Nitric Acid contained in the main cleaning chemical, Envirocid, used in the CIP systems at the facility. The amount released is calculated from the amount of Envirocid neutralized with the assumption that all of it is disassociated. This is also proportionate to the amount of CIP's and to the production volumes.

Rationale for Not Implementing Toxic Substance Reduction options

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided within the Master Document, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories at this point.

Therefore the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified as;

The level of sanitation and cleanliness standards required and set by the Canadian Food and Inspection Agency (CFIA) is strongly influencing our chemical choices.

The appropriate spill and leak prevention have already been addressed and are well managed to avoid that the Envirocid, containing Nitric Acid, is not release into the environment. The employees are also trained yearly on various operating procedures to ensure the proper management and handling of the chemicals used at the facility.

The CIP systems already have the ability to reuse and recycle the water and its chemical content for the following washes which lowers the volume of Envirocid used annually.

The products coming out of the Georgetown Facility do not contain any toxic substances. The substances reported are coming from the cleaning and sanitation requirements of the equipment making the products.

Nitrate Ion creation is directly correlated to the amount of Nitric Acid used and therefore the same rationale applies for not implementing reduction options for Nitrate Ion creation.

Statement that the Plan Summary Accurately Reflects the Current Version of the Plan

As required by s.24(1)8 of O.Reg.455/09 this Plan Summary accurately reflects the current version of the Plan.

Planner License Number

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan are as follows:

Jonathan Michael Fabro
Golder Associates Ltd.
Toxic Substance Reduction Planner License Number TSRP0189

Copies of the Certification

Certification statements are provided in the following page

Toxic Substance Reduction Plans Certification by Highest Ranking Employee

As required by s.4(2) of the *Toxics Reduction Act* (TRA), Toxic Substance Reduction Plans must contain a certification, signed by the highest ranking employee at the Facility who has management responsibilities relating to the Facility.

The following Certification Statement is being made under s.19(2) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) and satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plans that are assembled within this single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

As of December 13, 2013, I, Victor Pavlovski, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

- *Nitric Acid Version 1.0 (December 13, 2013)*
- *Nitrate Ion Version 1.0 (December 13, 2013)*



*Victor Pavlovski
Plant Manager
279 Guelph Street, Georgetown, ON
Saputo Dairy Products Canada*

Dec 20/2013

Date

December 13, 2013

Project No. 13-1134-0143-L02

Prunelle Paquette
Saputo Dairy Products Canada G.P.
2365 Chemin de la Côte-de-Liesse
St-Laurent, Quebec
H4N 2M7

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CERTIFICATION STATEMENT FOR PHASE II
TOXIC SUBSTANCE REDUCTION PLANS FOR SAPUTO DAIRY PRODUCTS CANADA G.P. – 279 GUELPH
STREET, GEORGETOWN, ONTARIO**

Dear Ms. Paquette::

Golder Associates Ltd. (Golder) was retained by Saputo Dairy Products Canada G.P. to provide various services pertaining to Toxic Substance Reduction Plan preparation under the *Toxic Reduction Act* (TRA) for the facility located at 279 Guelph Street, Georgetown, Ontario, including Toxic Substance Reduction Planner (Planner) certification of Phase II Toxic Substance Reduction Plans (the Plans).

The following Planner Certification Statement which is made under s.19.1(4) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) satisfies the Planner Certification requirements for the Plans that are assembled as a single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

As of December 13, 2013, I, Jonathan Michael Fabro, certify that I am familiar with the processes at the Saputo Dairy Products Canada G.P. facility located at 279 Guelph Street in Georgetown, Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the Toxics Reduction Act, 2009 that are set out in the toxic substance reduction plans referred to below for the toxic substances and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

- *Nitric Acid Version 1.0 (December 13, 2013)*
- *Nitrate Ion Version 1.0 (December 13, 2013)*



J. Michael Fabro, B.A.Sc., M.E.B.
Toxic Substance Reduction Planner
License No. TSRP0189

December 20, 2013

Date

JMF/slc



TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plans for Nitric Acid, Nitrate Ion each dated December 13, 2013 (Version 1.0).

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This is a Master Document which provides supporting information for Toxic Substance Reduction Plans for the following Substances: Nitric Acid CAS 7697-37-2 and Nitrate Ion* [*Per O.Reg. 455/09; "no single CAS number applies to this substance"]
NPRI and O. Reg. 127/01 Identification Numbers	NPRI ID: 10913 O.Reg. 127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	SAPUTO DAIRY PRODUCTS CANADA G.P. 861, Clyde Avenue Ottawa, Ontario K1Z 5A4, Canada
The number of full time employee equivalents at the facility	137
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	•NAICS 2 Code: 31 - Manufacturing •NAICS 4 Code: 3115 - Dairy Product Manufacturing •NAICS 6 Code: 311511 - Fluid Milk Manufacturing
Public contact	Environmental@saputo.com
Technical contact and person who is responsible for coordinating plan preparation	Prunelle Paquette Project Leader, Environmental Affairs 2365 Chemin de la Cote-de-Liesse, Montreal, Quebec, H4N 2M7, Canada (514)328-3466 prunelle.paquette@saputo.com
The person who prepared the plan	Prunelle Paquette
Highest Ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for certification	Annie Archambault Plant Manager 861, Clyde Avenue Ottawa, Ontario K1Z 5A4, Canada (613)728-1751 annie.archambault@saputo.com
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	Zone 17T (NAD83) 337183.35 E 218617.85 N

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Substances	CAS #
Nitric Acid	7697-37-2
Nitrate Ion	N/A
Sulphuric Acid	7664-93-9

Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility's intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

Saputo Inc. is one of the top ten dairy processors in the world, the largest in Canada, the third largest in Argentina and among the top three cheese producers in the United States.

We are committed to pursuing environmentally responsible business practices and we seek continuous improvement in our environmental performance. In doing so, we define, review and update our environmental objectives in order for our operations to be managed in compliance with applicable environmental laws and regulations, taking into consideration sound management.

More information pertaining to Saputo's commitments to EHS are available on Saputo's corporate website: www.saputo.com

Although Saputo is pursuing environmentally responsible business practices, no statement of intent to reduce the use and creation of toxic substances through the TRA process is included as part of this Plan. Saputo's current and past activities and initiatives at the Facility have resulted in the reduction of the use and creation of toxic substances and no further reduction options could be identified through the TRA process.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- Evaluate if there are any potential options for the reduction in use of toxic chemicals currently found at the Facility and establish a path forward that includes feasible reduction options;
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

Description of Why the Toxic Substance is Used or Created

Nitric Acid containing chemicals are commonly used in food processing equipment cleaning such as cleaned-in-place (CIP). These cleaning methods are an additional and mandatory mechanism of process control to enhance the ability to better clean and sanitize production equipment to a greater degree of food safety and quality assurance. Cleaning operations must be performed strictly according to a carefully worked out procedure in order to attain the required degree of cleanliness. This means that the sequence must be exactly the same every time.

Nitrate Ion is then released from the neutralization of the Nitric Acid contained in the main cleaning chemical, Envirocid, used in the CIP systems at the facility. The amount released is calculated from the amount of Envirocid neutralized with the assumption that all of it is disassociated. This is also proportionate to the amount of CIP's and to the production volumes.

Rationale for Not Implementing Toxic Substance Reduction Options

As required by s.18(4) of O.Reg.455/09 (as amended by s.9(3) of O.Reg.214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories.

Therefore the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified as;

The level of sanitation and cleanliness standards required and set by the Canadian Food and Inspection Agency (CFIA) is strongly influencing our chemical choices.

The appropriate spill and leak prevention have already been addressed and are well managed to avoid that the Envirocid, containing Nitric Acid, is not release into the environment. The employees are also trained yearly on various operating procedures to ensure the proper management and handling of the chemicals used at the facility. The facility's majority of chemical handling is completed automatically, reducing the risk of accidents.

The CIP systems already have the ability to reuse and recycle the water and its chemical content for the following washes which lowers the volume of Envirocid used annually.

The products coming out of the Ottawa Facility do not contain any toxic substances. The substances reported are coming from the cleaning and sanitation requirements of the equipment making the products.

Nitrate Ion creation is directly correlated to the amount of Nitric Acid used and therefore the same rationale applies for not implementing reduction options for Nitrate Ion creation.

Statement that the Plan Summary Accurately Reflects the Current Version of the Plan

As required by s.24(1)8 of O.Reg.455/09 this Plan Summary accurately reflects the current version of the Plan.

Planner License Number

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan is as follows:

Jonathan Michael Fabro

Golder Associates Ltd.

Toxic Substance Reduction Planner License Number TSRP0189

Copies of the Certification

Certification statements are provided in the following page.

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plan for Sulfuric Acid dated December 13, 2013 (Version 1.0).

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This is a Master Document which provides supporting information for Toxic Substance Reduction Plan for the following Substance: Sulfuric Acid CAS 7664-93-9
NPRI and O. Reg. 127/01 Identification Numbers	NPRI ID: 10913 O.Reg. 127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	4223942 Canada Inc. SAPUTO DAIRY PRODUCTS CANADA G.P. 861, Clyde Avenue Ottawa, Ontario K1Z 5A4, Canada
The number of full time employee equivalents at the facility	137
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	•NAICS 2 Code: 31 - Manufacturing •NAICS 4 Code: 3115 - Dairy Product Manufacturing •NAICS 6 Code: 311511 - Fluid Milk Manufacturing
Public contact	Environmental@saputo.com
Technical contact and person who is responsible for coordinating plan preparation	Prunelle Paquette Project Leader, Environmental Affairs 2365 Chemin de la Cote-de-Liesse, Montreal, Quebec, H4N 2M7, Canada (514)328-3466 prunelle.paquette@saputo.com
The person who prepared the plan	Prunelle Paquette
Highest Ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for certification	Annie Archambault Plant Manager 861, Clyde Avenue Ottawa, Ontario K1Z 5A4, Canada (613)728-1751 annie.archambault@saputo.com
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	Zone 17T (NAD83) 337183.35 E 218617.85 N

List of All Substances for which Toxic Substance Reduction Plan Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plan for the following prescribed Toxic Substance:

Substances	CAS #
Nitric Acid	7697-37-2
Nitrate Ion	NA-17
Sulphuric Acid	7664-93-9

Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility's intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

Saputo Inc. is one of the top ten dairy processors in the world, the largest in Canada, the third largest in Argentina and among the top three cheese producers in the United States.

We are committed to pursuing environmentally responsible business practices and we seek continuous improvement in our environmental performance. In doing so, we define, review and update our environmental objectives in order for our operations to be managed in compliance with applicable environmental laws and regulations, taking into consideration sound management.

More information pertaining to Saputo's commitments to EHS are available on Saputo's corporate website: www.saputo.com

Although Saputo is pursuing environmentally responsible business practices, no statement of intent to reduce the use and creation of toxic substances through the TRA process is included as part of this Plan. Saputo's current and past activities and initiatives at the Facility have resulted in the reduction of the use and creation of toxic substances and no further reduction options could be identified through the TRA process.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- Evaluate if there are any potential options for the reduction in use of toxic chemicals currently found at the Facility and establish a path forward that includes feasible reduction options;
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

Description of Why the Toxic Substance is Used or Created

The Sulfuric Acid is used to neutralize the waste water coming from all the CIP systems across the facility. With its high efficiency, in part due to its 85% concentration, and cost effectiveness, the Sulfuric Acid is preferred compared to another type of acid to neutralise the pH of the incoming waste water.

The water coming from all the CIP systems is collected in the waste water nominated tank where some Sulfuric Acid is injected to balance the pH level prior to releasing it in towards the city's wastewater treatment plant.

Dosing is done using a pH probe for the reading sending a message to a pump if Sulfuric Acid is needed to re adjust the pH level; the pH is monitored daily to ensure the effluent leaving the facility is conformant with the municipal requirements. The sulfuric acid is completely dissociated during the neutralization and none is released within the waste water.

Rationale for Not Implementing Toxic Substance Reduction Options

As required by s.18(4) of O.Reg.455/09 (as amended by s.9(3) of O.Reg.214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories.

Therefore the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified as;

The cost and efficiency of using Sulfuric Acid compared to another acid for the neutralisation of the waste water is no justifiable.

The appropriate spill and leak prevention have already been addressed and are well managed to avoid that the Sulfuric Acid, is not release into the environment. The employees are also trained yearly on various operating procedures to ensure the proper management and handling of the chemicals used at the facility. The facility's majority of chemical handling is completed automatically, reducing the risk of accidents.

As the Sulfuric Acid is completely disassociated, it clearly cannot be reused or recycled.

The products coming out of the Ottawa Facility do not contain any toxic substances. The substance reported is coming from neutralisation of the waste water coming from the all the facilities' CIPs systems which is in the end disassociated.

Statement that the Plan Summary Accurately Reflects the Current Version of the Plan

As required by s.24(1)8 of O.Reg.455/09 this Plan Summary accurately reflects the current version of the Plan.

Planner License Number

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan are as follows:

Jonathan Michael Fabro

Golder Associates Ltd.

Toxic Substance Reduction Planner License Number TSRP0189

Copies of the Certification

Certification statements are provided in the following page.

Toxic Substance Reduction Plans Certification by Highest Ranking Employee

As required by s.4(2) of the *Toxics Reduction Act* (TRA), Toxic Substance Reduction Plans must contain a certification, signed by the highest ranking employee at the Facility who has management responsibilities relating to the Facility.

The following Certification Statement is being made under s.19(2) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) and satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plans that are assembled within this single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

As of December 13, 2013, I, Annie Archambault, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

- *Nitric Acid Version 1.0 (December 13, 2013)*
- *Nitrate Ion Version 1.0 (December 13, 2013)*
- *Sulphuric Acid Version 1.0 (December 13, 2013)*



Annie Archambault
Plant Manager
861 Clyde Avenue, Ottawa, ON
Saputo Dairy Products Canada

20 decembre 2013

Date

December 13, 2013

Project No. 13-1134-0143-L01

Prunelle Paquette
Saputo Dairy Products Canada G.P.
2365 Chemin de la Côte-de-Liesse
St-Laurent, Quebec
H4N 2M7

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CERTIFICATION STATEMENT FOR PHASE II
TOXIC SUBSTANCE REDUCTION PLANS FOR SAPUTO DAIRY PRODUCTS CANADA G.P. – 861 CLYDE
AVENUE, OTTAWA, ONTARIO**

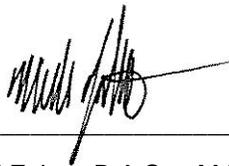
Dear Ms. Paquette::

Golder Associates Ltd. (Golder) was retained by Saputo Dairy Products Canada G.P. to provide various services pertaining to Toxic Substance Reduction Plan preparation under the *Toxic Reduction Act* (TRA) for the facility located at 861 Clyde Avenue in Ottawa, Ontario, including Toxic Substance Reduction Planner (Planner) certification of Phase II Toxic Substance Reduction Plans (the Plans).

The following Planner Certification Statement which is made under s.19.1(4) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) satisfies the Planner Certification requirements for the Plans that are assembled as a single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

As of December 13, 2013, I, Jonathan Michael Fabro, certify that I am familiar with the processes at the Saputo Dairy Products Canada G.P. facility located at 861 Clyde Avenue in Ottawa, Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the Toxics Reduction Act, 2009 that are set out in the toxic substance reduction plans referred to below for the toxic substances and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

- *Nitric Acid Version 1.0 (December 13, 2013)*
- *Nitrate Ion Version 1.0 (December 13, 2013)*
- *Sulphuric Acid Version 1.0 (December 13, 2013)*



J. Michael Fabro, B.A.Sc., M.E.B.
Toxic Substance Reduction Planner
License No. TSRP0189

December 20, 2013

Date

JMF/slc



TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plan for Sulfuric Acid dated December 13, 2013 (Version 1.0).

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This is a Master Document which provides supporting information for Toxic Substance Reduction Plans for the following Substance: Sulfuric Acid CAS 7664-93-9
NPRI and O. Reg. 127/01 Identification Numbers	NPRI ID: 5579 O.Reg. 127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Saputo Foods Limited SAPUTO DAIRY PRODUCTS CANADA G.P. 284 Hope Street RR#2 Tavistock, Ontario N0B 2R0, Canada
The number of full time employee equivalents at the facility	309
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	<ul style="list-style-type: none"> •NAICS 2 Code: 31 - Manufacturing •NAICS 4 Code: 3115 - Dairy Product Manufacturing •NAICS 6 Code: 311515 - Butter, Cheese, and Dry and Condensed Dairy Product Manufacturing
Public contact	Environmental@saputo.com
Technical contact and person who is responsible for coordinating plan preparation	Prunelle Paquette Project Leader, Environmental Affairs 2365 Chemin de la Cote-de-Liesse, Montreal, Quebec, H4N 2M7, Canada (514)328-3466 prunelle.paquette@saputo.com
The person who prepared the plan	Prunelle Paquette
Highest Ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for certification	Grant Hutcheson Plant Manager 284 Hope Street RR#2 Tavistock, Ontario N0B 2R0, Canada (519) 655-2337 Grant.hutcheson@saputo.com
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	Zone 17T (NAD83) 512479.006 E 4796273.903 N

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Substances	CAS #
Nitric Acid	7697-37-2
Nitrate Ion	NA-17
Sulphuric Acid	7664-93-9
PM10	NA-M09

Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility's intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

Saputo Inc. is one of the top ten dairy processors in the world, the largest in Canada, the third largest in Argentina and among the top three cheese producers in the United States.

We are committed to pursuing environmentally responsible business practices and we seek continuous improvement in our environmental performance. In doing so, we define, review and update our environmental objectives in order for our operations to be managed in compliance with applicable environmental laws and regulations, taking into consideration sound management.

More information pertaining to Saputo's commitments to EHS are available on Saputo's corporate website: www.saputo.com

Although Saputo is pursuing environmentally responsible business practices, no statement of intent to reduce the use and creation of toxic substances through the TRA process is included as part of this Plan. Saputo's current and past activities and initiatives at the Facility have resulted in the reduction of the use and creation of toxic substances and no further reduction options could be identified through the TRA process.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- Evaluate if there are any potential options for the reduction in use of toxic chemicals currently found at the Facility and establish a path forward that includes feasible reduction options;
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

Description of Why the Toxic Substance is Used or Created

The Sulfuric Acid is used to neutralize the waste water coming from all the CIP systems across the facility. With its high efficiency, in part due to its 85% concentration, and cost effectiveness, the Sulfuric Acid is preferred compared to another type of acid to neutralise the pH of the incoming waste water.

The water coming from all the CIP systems is collected in the waste water nominated tank were some Sulfuric Acid is injected to balance the pH level prior to releasing it in towards the city's wastewater treatment plant.

Dosing is done using a pH probe for the reading sending a message to a pump if Sulfuric Acid is needed to re adjust the pH level; the pH is monitored daily to ensure the effluent leaving the facility is conformant with the municipal requirements. The sulfuric acid is completely dissociated during the neutralization and none is released within the waste water.

Rationale for not implementing toxic substance reduction options

As required by s.18(4) of O.Reg.455/09 (as amended by s.9(3) of O.Reg.214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories.

Therefore the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified as;

The cost and efficiency of using Sulfuric Acid compared to another acid for the neutralisation of the waste water is no justifiable.

The appropriate spill and leak prevention have already been addressed and are well managed to avoid that the Sulfuric Acid, is not release into the environment. The employees are also trained yearly on various operating procedures to ensure the proper management and handling of the chemicals used at the facility. The facility's majority of chemical handling is completed automatically, reducing the risk of accidents.

As the Sulfuric Acid is completely disassociated, it clearly cannot be reused or recycled.

The products coming out of the Tavistock Facility do not contain any toxic substances. The substance reported is coming from neutralisation of the waste water coming from the all the facilities' CIPs systems which is in the end disassociated.

Statement that the Plan Summary Accurately Reflects the Current Version of the Plan

As required by s.24(1)8 of O.Reg.455/09 this Plan Summary accurately reflects the current version of the Plan.

Planner License Number

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan are as follows:

Jonathan Michael Fabro

Golder Associates Ltd.

Toxic Substance Reduction Planner License Number TSRP0189

Copies of the Certification

Certification statements are provided in the following page

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plans for Nitric Acid and Nitrate Ion each dated December 13, 2013 (Version 1.0).

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This is a Master Document which provides supporting information for Toxic Substance Reduction Plans for the following Substances: Nitric Acid CAS 7697-37-2, and Nitrate Ion* [*Per O.Reg. 455/09; "no single CAS number applies to this substance"]
NPRI and O. Reg. 127/01 Identification Numbers	NPRI ID: 5579 O.Reg. 127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Saputo Foods Limited SAPUTO DAIRY PRODUCTS CANADA G.P. 284 Hope Street RR#2 Tavistock, Ontario N0B 2R0, Canada
The number of full time employee equivalents at the facility	309
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	<ul style="list-style-type: none"> •NAICS 2 Code: 31 - Manufacturing •NAICS 4 Code: 3115 - Dairy Product Manufacturing •NAICS 6 Code: 311515 - Butter, Cheese, and Dry and Condensed Dairy Product Manufacturing
Public contact	Environmental@saputo.com
Technical contact and person who is responsible for coordinating plan preparation	Prunelle Paquette Project Leader, Environmental Affairs 2365 Chemin de la Cote-de-Liesse, Montreal, Quebec, H4N 2M7, Canada (514)328-3466 prunelle.paquette@saputo.com
The person who prepared the plan	Prunelle Paquette
Highest Ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for certification	Grant Hutcheson Plant Manager 284 Hope Street RR#2 Tavistock, Ontario N0B 2R0, Canada (519) 655-2337 Grant.hutcheson@saputo.com
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	Zone 17T (NAD83) 512479.006 E 4796273.903 N

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Substances	CAS #
Nitric Acid	7697-37-2
Nitrate Ion	NA-17
Sulphuric Acid	7664-93-9
PM10	NA-M09

Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility's intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

Saputo Inc. is one of the top ten dairy processors in the world, the largest in Canada, the third largest in Argentina and among the top three cheese producers in the United States.

We are committed to pursuing environmentally responsible business practices and we seek continuous improvement in our environmental performance. In doing so, we define, review and update our environmental objectives in order for our operations to be managed in compliance with applicable environmental laws and regulations, taking into consideration sound management.

More information pertaining to Saputo's commitments to EHS are available on Saputo's corporate website: www.saputo.com

Although Saputo is pursuing environmentally responsible business practices, no statement of intent to reduce the use and creation of toxic substances through the TRA process is included as part of this Plan. Saputo's current and past activities and initiatives at the Facility have resulted in the reduction of the use and creation of toxic substances and no further reduction options could be identified through the TRA process.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- Evaluate if there are any potential options for the reduction in use of toxic chemicals currently found at the Facility and establish a path forward that includes feasible reduction options;
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

Description of Why the Toxic Substance is Used or Created

Nitric Acid containing chemicals are commonly used in food processing equipment cleaning such as cleaned-in-place (CIP). These cleaning methods are an additional and mandatory mechanism of process control to enhance the ability to better clean and sanitize production equipment to a greater degree of food safety and quality assurance. Cleaning operations must be performed strictly according to a carefully worked out procedure in order to attain the required degree of cleanliness. This means that the sequence must be exactly the same every time. Nitrate Ion is then released from the neutralization of the Nitric Acid contained in the main cleaning chemical, used in the CIP systems at the facility. The amount released is calculated from the amount of Nitric Acid neutralized with the assumption that all of it is disassociated. This is also proportionate to the amount of CIP's and to the production volumes.

Rationale for not implementing toxic substance reduction options

As required by s.18(4) of O.Reg.455/09 (as amended by s.9(3) of O.Reg.214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories.

Therefore the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified as;

The level of sanitation and cleanliness standards required and set by the Canadian Food and Inspection Agency (CFIA) is strongly influencing our chemical choices.

The appropriate spill and leak prevention have already been addressed and are well managed to avoid that the Envirocid, containing Nitric Acid, is not release into the environment. The employees are also trained yearly on various operating procedures to ensure the proper management and handling of the chemicals used at the facility. The facility's majority of chemical handling is completed automatically, reducing the risk of accidents.

The CIP systems already have the ability to reuse and recycle the water and its chemical content for the following washes which lowers the volume of Envirocid used annually.

The products coming out of the Ottawa Facility do not contain any toxic substances. The substances reported are coming from the cleaning and sanitation requirements of the equipment making the products.

Nitrate Ion creation is directly correlated to the amount of Nitric Acid used and therefore the same rationale applies for not implementing reduction options for Nitrate Ion creation.

Statement that the Plan Summary Accurately Reflects the Current Version of the Plan

As required by s.24(1)8 of O.Reg.455/09 this Plan Summary accurately reflects the current version of the Plan.

Planner License Number

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan are as follows:

Jonathan Michael Fabro
Golder Associates Ltd.
Toxic Substance Reduction Planner License Number TSRP0189

Copies of the Certification

Certification statements are provided in the following page.

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plan for PM10 dated December 13, 2013 (Version 1.0).

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This is a Master Document which provides supporting information for Toxic Substance Reduction Plans for the following Substances: PM10 CAS NA-M09
NPRI and O. Reg. 127/01 Identification Numbers	NPRI ID: 5579 O.Reg. 127/01 ID:N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Saputo Foods Limited SAPUTO DAIRY PRODUCTS CANADA G.P. 284 Hope Street RR#2 Tavistock, Ontario N0B 2R0, Canada
The number of full time employee equivalents at the facility	309
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	<ul style="list-style-type: none"> •NAICS 2 Code: 31 - Manufacturing •NAICS 4 Code: 3115 - Dairy Product Manufacturing •NAICS 6 Code: 311515 - Butter, Cheese, and Dry and Condensed Dairy Product Manufacturing
Public contact	Environmental@saputo.com
Technical contact and person who is responsible for coordinating plan preparation	Prunelle Paquette Project Leader, Environmental Affairs 2365 Chemin de la Cote-de-Liesse, Montreal, Quebec, H4N 2M7, Canada (514)328-3466 prunelle.paquette@saputo.com
The person who prepared the plan	Prunelle Paquette
Highest Ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for certification	Grant Hutcheson Plant Manager 284 Hope Street RR#2 Tavistock, Ontario N0B 2R0, Canada (519) 655-2337 Grant.hutcheson@saputo.com
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	Zone 17T (NAD83) 512479.006 E 4796273.903 N

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Substances	CAS #
Nitric Acid	7697-37-2
Nitrate Ion	NA-17
Sulphuric Acid	7664-93-9
PM10	NA-M09

Statement of Intent

Saputo Inc. is one of the top ten dairy processors in the world, the largest in Canada, the third largest in Argentina and among the top three cheese producers in the United States.

We are committed to pursuing environmentally responsible business practices and we seek continuous improvement in our environmental performance. In doing so, we define, review and update our environmental objectives in order for our operations to be managed in compliance with applicable environmental laws and regulations, taking into consideration sound management.

To achieve this commitment, we:

- Dedicate human resources to ensure continued monitoring of our operations and, in collaboration with governmental authorities, to seek opportunities to prevent and minimize the environmental impact of our activities going forward;
- Promote environmental awareness, leadership and accountability among employees in regard to environmental protection
- Train employees in their environmental responsibilities;
- Conduct environmental audits to confirm that the operations are managed in compliance with this policy's objectives and principle of sound management;
- Adopt and apply programs and procedures which minimize the consequences of emergency events;
- Report to the Board of Directors on the environmental status of our operations.

More information pertaining to Saputo's commitments to EHS are available on Saputo's corporate website: www.saputo.com

Saputo's intent to reduce its "creation" of the Toxic Substance has not been included as a part of this Plan. The Toxic Substance cannot be "used" in the Facility process and therefore no statement with respect to intent to reduce use of the Toxic Substance is required.

The MOE has stated that the TRA is not intended to focus on "end of pipe" emissions as they don't necessarily have any bearing on the amount of a substance that is "used" or "created," however in this case, "end of pipe" emissions of suspended particulate matter is the determining factor of the Facility's TRA reporting status with respect to the Toxic Substance.

Despite the Facility's reporting status with respect to the Toxic Substance, the Facility feels that it has previously optimized its control of the "creation" and subsequent release of the Toxic Substance to the greatest extent that can reasonably be expected.

Also, it should be noted that the facility already has an existing valid certificate of approval for air, delivered by the Ministry of the Environment of Ontario.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- Provide the reader with information on measures currently in place at the Facility which control the “creation” and subsequent release of the Toxic Substance;
- Provide support for the Facility’s position with respect to the Statement of Intent of this Plan; and
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

Description of Why the Toxic Substance is Used or Created

The particulate matters, PM10, are generated during the whey production. Whey is the liquid residue of the cheese production. Whey must be processed as soon as possible after collection, as its temperature and composition promote the growth of bacteria. Whey will first make its way into the RO concentration and then to the evaporator-MVR to then end in the dryer.

Particulate emissions from the whey dryer are controlled by a wet scrubber which will collect the particulate matter prior to releasing it into the air. The second activity that has also been classified as a “creation” of the Toxic Substance is the generation of particulate matter from the Cooling towers. They are used to dissipate waste heat to the atmosphere. Because of the direct contact between the cooling water and air, water droplets can be carried out of the cooling tower in the air stream which is known as liquid drift. In the end, the solids contained in the droplets are quantified as particulate matter. Due to the nature of the Toxic Substance, the substance can never be “used” in the Facility process.

For the purpose of the required TRA Quantification, Accounting and Reporting exercise for the Toxic Substance, the calculated “release” values have been assumed to be equal to the amount “created” for each emission source, despite the fact that some of these releases are controlled releases. S.12(6) of O. Reg. 455/09 provides considerations for determining the “Best Available Methods” for tracking and quantifying the Toxic Substance. MOE guidance pertaining to this section of O. Reg. 455/09 states that the importance of selecting Best Available Methods is to provide the best decision making information when determining which toxics reduction options, if any, are worthwhile to implement.

It should be noted that, given the Facility’s decision to not include in this Plan a statement of its intent to reduce the “creation” of the Toxic Substance (as supported by the information provided in the Statement of Intent section of the Plan), no decisions will be made with respect to toxics reduction based on the calculated “creation” values for the Toxic Substance.

Taking this into consideration, the Facility used judgement based on relevance and effort required to obtain information and feels that it has gone to reasonable efforts in identifying and applying the Best Available Methods for quantifications in this case.

Rationale for not implementing toxic substance reduction options

As required by s.18(4) of O.Reg.455/09 (as amended by s.9(3) of O.Reg.214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories.

Therefore the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified at this point.

Statement that the Plan Summary Accurately Reflects the Current Version of the Plan

As required by s.24(1)8 of O.Reg.455/09 this Plan Summary accurately reflects the current version of the Plan.

Planner License Number

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan are as follows:

Jonathan Michael Fabro

Golder Associates Ltd.

Toxic Substance Reduction Planner License Number TSRP0189

Copies of the Certification

Certification statements are provided in the following page.

Toxic Substance Reduction Plans Certification by Highest Ranking Employee

As required by s.4(2) of the *Toxics Reduction Act* (TRA), Toxic Substance Reduction Plans must contain a certification, signed by the highest ranking employee at the Facility who has management responsibilities relating to the Facility.

The following Certification Statement is being made under s.19(2) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) and satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plans that are assembled within this single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

As of December 13, 2013, I, Grant Hutcheson, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

- *Nitric Acid Version 1.0 (December 13, 2013)*
- *Nitrate Ion Version 1.0 (December 13, 2013)*
- *Sulphuric Acid Version 1.0 (December 13, 2013)*
- *Particulate Matter, PM10 Version 1.0 (December 13, 2013)*



Grant Hutcheson
Plant Manager
284 Hope Street RR#2, Tavistock, ON
Saputo Dairy Products Canada G.P.

Dec 23, 2013

Date

December 13, 2013

Project No. 13-1134-0143-L03

Prunelle Paquette
Saputo Dairy Products Canada G.P. 2365 Chemin de la Côte-de-Liesse
St-Laurent, Quebec
H4N 2M7

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CERTIFICATION STATEMENT FOR PHASE II
TOXIC SUBSTANCE REDUCTION PLANS FOR SAPUTO DAIRY PRODUCTS CANADA G.P. – 284 HOPE
STREET RR#2 IN TAVISTOCK, ONTARIO**

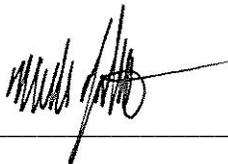
Dear Ms. Paquette::

Golder Associates Ltd. (Golder) was retained by Saputo Dairy Products Canada G.P. to provide various services pertaining to Toxic Substance Reduction Plan preparation under the *Toxic Reduction Act* (TRA) for the facility located at 284 Hope Street RR#2 in Tavistock, Ontario, including Toxic Substance Reduction Planner (Planner) certification of Phase II Toxic Substance Reduction Plans (the Plans).

The following Planner Certification Statement which is made under s.19.1(4) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) satisfies the Planner Certification requirements for the Plans that are assembled as a single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

As of December 13, 2013, I, Jonathan Michael Fabro, certify that I am familiar with the processes at the Saputo Dairy Products Canada G.P. facility located at 284 Hope Street RR#2 in Tavistock, Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the Toxics Reduction Act, 2009 that are set out in the toxic substance reduction plans referred to below for the toxic substances and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

- *Nitric Acid Version 1.0 (December 13, 2013)*
- *Nitrate Ion Version 1.0 (December 13, 2013)*
- *Sulphuric Acid Version 1.0 (December 13, 2013)*
- *Particulate Matter (PM₁₀) Version 1.0 (December 13, 2013)*



J. Michael Fabro, B.A.Sc., M.E.B.
Toxic Substance Reduction Planner
License No. TSRP0189

December 20, 2013

Date

JMF/slc



TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plan for Nitric Acid dated December 13, 2014 (Version 1.0).

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This is a Master Document which provides supporting information for Toxic Substance Reduction Plans for the following Substances: Nitric Acid CAS 7697-37-2, and Nitrate Ion* [*Per O.Reg. 455/09; "no single CAS number applies to this substance"]
NPRI and O. Reg. 127/01 Identification Numbers	NPRI ID: 11853 O.Reg. 127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Saputo Foods Limited SAPUTO DAIRY PRODUCTS CANADA G.P. 7, RIVERSIDE DR., P.O. BOX 627 TRENTON, ON, K8V 5R7
The number of full time employee equivalents at the facility	126
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	<ul style="list-style-type: none"> •NAICS 2 Code: 31 - Manufacturing •NAICS 4 Code: 3115 - Dairy Product Manufacturing •NAICS 6 Code: 311515 - Butter, Cheese, and Dry and Condensed Dairy Product Manufacturing
Public contact	Environmental@saputo.com
Technical contact and person who is responsible for coordinating plan preparation	Prunelle Paquette Project Leader, Environmental Affairs 2365 Chemin de la Cote-de-Liesse, Montreal, Quebec, H4N 2M7, Canada (514)328-3466 prunelle.paquette@saputo.com
The person who prepared the plan	Prunelle Paquette
Highest Ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for certification	Trevor Braun Plant Manager 7, RIVERSIDE DR., P.O. BOX 627 TRENTON, ON, K8V 5R7 (613) 392-6792 Trevor.Braun@saputo.com
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	Zone 18T (NAD83) 293090.53E 4889875.95N

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Substances	CAS #
Nitric Acid	7697-37-2
Nitrate Ion	NA-17
PM10	NA-M09

Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility's intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

Saputo Inc. is one of the top ten dairy processors in the world, the largest in Canada, the third largest in Argentina and among the top three cheese producers in the United States.

We are committed to pursuing environmentally responsible business practices and we seek continuous improvement in our environmental performance. In doing so, we define, review and update our environmental objectives in order for our operations to be managed in compliance with applicable environmental laws and regulations, taking into consideration sound management.

More information pertaining to Saputo's commitments to EHS are available on Saputo's corporate website: www.saputo.com

Although Saputo is pursuing environmentally responsible business practices, no statement of intent to reduce the use and creation of toxic substances through the TRA process is included as part of this Plan. Saputo's current and past activities and initiatives at the Facility have resulted in the reduction of the use and creation of toxic substances and no further reduction options could be identified through the TRA process.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- Provide the reader with information on measures currently in place at the Facility which control the "creation" and subsequent release of the Toxic Substance;
- Provide support for the Facility's position with respect to the Statement of Intent of this Plan; and
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

Description of Why the Toxic Substance is Used or Created

Nitric Acid containing chemicals are commonly used in food processing equipment cleaning such as cleaned-in-place (CIP). These cleaning methods are an additional and mandatory mechanism of process control to enhance the ability to better clean and sanitize production equipment to a greater degree of food safety and quality assurance. Cleaning operations must be performed strictly according to a carefully worked out procedure in order to attain the required degree of cleanliness. This means that the sequence must be exactly the same every time. Nitrate Ion is then released from the neutralization of the Nitric Acid contained in the main cleaning chemical, used in the CIP systems at the facility. The amount released is calculated from the amount of Nitric Acid neutralized with the assumption that all of it is disassociated. This is also proportionate to the amount of CIP's and to the production volumes.

Rationale for not implementing toxic substance reduction options

As required by s.18(4) of O.Reg.455/09 (as amended by s.9(3) of O.Reg.214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories.

Therefore the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified as;

The level of sanitation and cleanliness standards required and set by the Canadian Food and Inspection Agency (CFIA) is strongly influencing our chemical choices.

The appropriate spill and leak prevention have already been addressed and are well managed to avoid that the Nitric Acid is not release into the environment. The employees are also trained yearly on various operating procedures to ensure the proper management and handling of the chemicals used at the facility. The facility's majority of chemical handling is completed automatically, reducing the risk of accidents.

The CIP systems already have the ability to reuse and recycle the water and its chemical content for the following washes which lowers the volume of Nitric Acid used annually.

The products coming out of the Trenton Facility do not contain any toxic substances. The substances reported are coming from the cleaning and sanitation requirements of the equipment making the products.

Nitrate Ion creation is directly correlated to the amount of Nitric Acid used and therefore the same rationale applies for not implementing reduction options for Nitrate Ion creation.



Statement that the Plan Summary Accurately Reflects the Current Version of the Plan

As required by s.24(1)8 of O.Reg.455/09 this Plan Summary accurately reflects the current version of the Plan.

Planner License Number

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan are as follows:

Jonathan Michael Fabro
Golder Associates Ltd.
Toxic Substance Reduction Planner License Number TSRP0189

Copies of the Certification

Certification statements are provided in the following page

TOXIC SUBSTANCE REDUCTION PLAN SUMMARY

This Toxic Substance Reduction Plan Summary has been prepared in accordance with Section 8(2) of the Toxics Reduction Act and satisfies the minimum Plan Summary content requirements stipulated in Section 24 of Ontario Regulation 455/09. This plan summary accurately reflects the content of the plan for Sulfuric Acid dated December 13, 2013 (Version 1.0).

Basic Facility Information

Mandatory Basic Facility Information Item	Details
Substance Name and Chemical Abstracts Service (CAS) Registry Number, if any	This is a Master Document which provides supporting information for Toxic Substance Reduction Plans for the following Substances: Nitric Acid CAS 7697-37-2, and Nitrate Ion* [*Per O.Reg. 455/09; "no single CAS number applies to this substance"]
NPRI and O. Reg. 127/01 Identification Numbers	NPRI ID: 11853 O.Reg. 127/01 ID: N/A
The legal and trade names of the owner and the operator of the facility, the street address of the facility and the mailing address of the facility, if different	Saputo Foods Limited SAPUTO DAIRY PRODUCTS CANADA G.P. 7, RIVERSIDE DR., P.O. BOX 627 TRENTON, ON, K8V 5R7
The number of full time employee equivalents at the facility	126
The two- and four-digit North American Industry Classification System (NAICS) codes and the six-digit NAICS Canada code	<ul style="list-style-type: none"> •NAICS 2 Code: 31 - Manufacturing •NAICS 4 Code: 3115 - Dairy Product Manufacturing •NAICS 6 Code: 311515 - Butter, Cheese, and Dry and Condensed Dairy Product Manufacturing
Public contact	Environmental@saputo.com
Technical contact and person who is responsible for coordinating plan preparation	Prunelle Paquette Project Leader, Environmental Affairs 2365 Chemin de la Cote-de-Liesse, Montreal, Quebec, H4N 2M7, Canada (514)328-3466 prunelle.paquette@saputo.com
The person who prepared the plan	Prunelle Paquette
Highest Ranking employee at the facility who has management responsibilities relating to the facility and who is responsible for certification	Trevor Braun Plant Manager 7, RIVERSIDE DR., P.O. BOX 627 TRENTON, ON, K8V 5R7 (613) 392-6792 Trevor.Braun@saputo.com
The spatial coordinates of the facility expressed in Universal Transverse Mercator (UTM) within a North American Datum 83 (NAD83) datum	Zone 18T (NAD83) 293090.53E 4889875.95N

List of All Substances for which Toxic Substance Reduction Plans Have Been Prepared at the Facility

The Facility has prepared Toxic Substance Reduction Plans for the following prescribed Toxic Substances:

Substances	CAS #
Nitric Acid	7697-37-2
Nitrate Ion	NA-17
PM10	NA-M09

Statement of Intent

As required by s.4(1) of the TRA, a Plan must include either a statement of the Facility's intent to reduce the use and/or creation of the Toxic Substance at the Facility, or the reasons for not including this statement.

Saputo Inc. is one of the top ten dairy processors in the world, the largest in Canada, the third largest in Argentina and among the top three cheese producers in the United States.

We are committed to pursuing environmentally responsible business practices and we seek continuous improvement in our environmental performance. In doing so, we define, review and update our environmental objectives in order for our operations to be managed in compliance with applicable environmental laws and regulations, taking into consideration sound management.

More information pertaining to Saputo's commitments to EHS are available on Saputo's corporate website: www.saputo.com

Although Saputo is pursuing environmentally responsible business practices, no statement of intent to reduce the use and creation of toxic substances through the TRA process is included as part of this Plan. Saputo's current and past activities and initiatives at the Facility have resulted in the reduction of the use and creation of toxic substances and no further reduction options could be identified through the TRA process.

Saputo's intent to reduce its "creation" of the Toxic Substance has not been included as a part of this Plan. The Toxic Substance cannot be "used" in the Facility process and therefore no statement with respect to intent to reduce use of the Toxic Substance is required.

The MOE has stated that the TRA is not intended to focus on "end of pipe" emissions as they don't necessarily have any bearing on the amount of a substance that is "used" or "created," however in this case, "end of pipe" emissions of suspended particulate matter is the determining factor of the Facility's TRA reporting status with respect to the Toxic Substance.

Despite the Facility's reporting status with respect to the Toxic Substance, the Facility feels that it has previously optimized its control of the "creation" and subsequent release of the Toxic Substance to the greatest extent that can reasonably be expected.

Also, it should be noted that the facility already has an existing valid certificate of approval for air, delivered by the Ministry of the Environment of Ontario.

Objectives of the Toxic Substance Reduction Plan

The Objectives of the Plan are as follows:

- Provide the reader with information on measures currently in place at the Facility which control the “creation” and subsequent release of the Toxic Substance;
- Provide support for the Facility’s position with respect to the Statement of Intent of this Plan; and
- Document how the Facility has fulfilled the applicable requirements under the TRA and O. Reg. 455/09 with respect to the Toxic Substance.

Description of Why the Toxic Substance is Used or Created

The grated and powdered cheeses produced at the Trenton facility are produced by removing the moisture. The PM10 are generated mainly during the cheese drying production. Particulate emissions from the dryer are controlled by a wet scrubber which collects the particulate matter prior to releasing it into the air.

Due to the nature of the Toxic Substance, the substance can never be “used” in the Facility process.

For the purpose of the required TRA Quantification, Accounting and Reporting exercise for the Toxic Substance, the calculated “release” values have been assumed to be equal to the amount “created” for each emission source, despite the fact that some of these releases are controlled releases. S.12(6) of O. Reg. 455/09 provides considerations for determining the “Best Available Methods” for tracking and quantifying the Toxic Substance

For the purpose of the required TRA Quantification, Accounting and Reporting exercise for the Toxic Substance, the calculated “release” values have been assumed to be equal to the amount “created” for each emission source, despite the fact that some of these releases are controlled releases. S.12(6) of O. Reg. 455/09 provides considerations for determining the “Best Available Methods” for tracking and quantifying the Toxic Substance. MOE guidance pertaining to this section of O. Reg. 455/09 states that the importance of selecting Best Available Methods is to provide the best decision making information when determining which toxics reduction options, if any, are worthwhile to implement.

It should be noted that, given the Facility’s decision to not include in this Plan a statement of its intent to reduce the “creation” of the Toxic Substance (as supported by the information provided in the Statement of Intent section of the Plan), no decisions will be made with respect to toxics reduction based on the calculated “creation” values for the Toxic Substance.

Taking this into consideration, the Facility used judgement based on relevance and effort required to obtain information and feels that it has gone to reasonable efforts in identifying and applying the Best Available Methods for quantifications in this case.

Rationale for not implementing toxic substance reduction options

As required by s.18(4) of O.Reg.455/09 (as amended by s.9(3) of O.Reg.214/11), a Plan must contain an explanation of why no toxic substance reduction options will be implemented.

Facility personnel have considered each of the seven categories for toxic substance reduction options, and, in light of the information provided in the Statement of Intent section of this Plan, the Facility feels that no toxic substance reduction options can be identified in any of the seven toxic substance reduction categories.

Therefore the rationale for not implementing toxic substance reduction options is that no toxic substance reduction options could be identified at this point.



Statement that the Plan Summary Accurately Reflects the Current Version of the Plan

As required by s.24(1)8 of O.Reg.455/09 this Plan Summary accurately reflects the current version of the Plan.

Planner License Number

As required by s.18(2) of O. Reg. 455/09 (as amended by s. 9(2) of O. Reg. 214/11), the Licensed Toxic Substance Reduction Planner responsible for providing Planner Recommendations on and certification of this Plan are as follows:

Jonathan Michael Fabro
Golder Associates Ltd.
Toxic Substance Reduction Planner License Number TSRP0189

Copies of the Certification

Certification statements are provided in the following page

December 13, 2014

Project No. 1406512-L01

Prunelle Paquette
Saputo Dairy Products Canada G.P.

**LICENSED TOXIC SUBSTANCE REDUCTION PLANNER CERTIFICATION STATEMENT FOR
PHASE II TOXIC SUBSTANCE REDUCTION PLANS FOR
SAPUTO DAIRY PRODUCTS CANADA G.P. – 7 RIVERSIDE DRIVE IN TRENTON, ONTARIO**

Dear Ms. Paquette:

Golder Associates Ltd. (“Golder”) was retained by Saputo Dairy Products Canada G.P. to provide various services pertaining to Toxic Substance Reduction Plan preparation under the *Toxic Reduction Act* (TRA) for the facility located at 7 Riverside Drive in Trenton, Ontario; including Toxic Substance Reduction Planner (Planner) certification of Phase II Toxic Substance Reduction Plans (“the Plans”).

The following Planner Certification Statement which is made under s.19.1(4) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg. 214/11) satisfies the Planner Certification requirements for the Plans that are assembled as a single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

As of December 13, 2014, I, Jonathan Michael Fabro, certify that I am familiar with the processes at the Saputo Dairy Products Canada G.P. facility located at 7 Riverside Drive in Trenton, Ontario that use or create the toxic substance referred to below, that I agree with the estimates referred to in subparagraphs 7 iii, iv and v of subsection 4 (1) of the Toxics Reduction Act, 2009 that are set out in the toxic substance reduction plans referred to below for the toxic substances and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

- *Nitric Acid Version 1.0 (December 13, 2014)*
- *Nitrate Ion Version 1.0 (December 13, 2014)*
- *Particulate Matter (PM₁₀) Version 1.0 (December 13, 2014)*



December 13, 2014

J. Michael Fabro, M.E.B., P.Eng.
Toxic Substance Reduction Planner
License No. TSRP0189

Date

JMF/KGL/cr



DATE December 13, 2014**PROJECT No.** 1406512-M01**TO** Prunelle Paquette
Saputo Dairy Products Canada G.P.**FROM** J. Michael Fabro**EMAIL** mfabro@golder.com**TOXIC SUBSTANCE REDUCTION PLANNER RECOMMENDATIONS ON THE
DRAFT DOCUMENT TITLED
“MASTER DOCUMENT SUPPORTING VARIOUS TOXIC SUBSTANCE REDUCTION PLANS”**

Golder Associates Ltd. (“Golder”) was retained by Saputo Dairy Products Canada G.P. (“Saputo”) to provide various services pertaining to Phase I and II Toxic Substance Reduction Plan preparation under the Toxics Reduction Act (TRA), including Toxic Substance Reduction Planner recommendations (Planner Recommendations) for the facility located at 7 Riverside Drive in Trenton, Ontario.

Saputo’s Trenton, Ontario facility (“the Facility”) is required to prepare Plans for various prescribed toxic substances (“the Toxic Substances”) which travel together through the Facility process, and therefore the Facility has elected to take advantage of administrative efficiencies afforded by the Toxics Reduction Act and Ontario Regulation (O.Reg.) 455/09 by preparing a single Master Document which satisfies various Plan requirements for all of these Toxic Substances.

Background

As required by s.18.2 of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11), a facility is required to provide a draft copy of the Plan to a licensed Toxic Substance Reduction Planner (“the Planner”) for the purpose of obtaining recommendations with respect to the Plan. This technical memorandum fulfills the requirements of s.18.2 of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11)

Following Ontario Ministry of the Environment and Climate Change (MOECC) guidance, respective plans for each Toxic Substance have been prepared as “Skeleton Plans” which simply reference content found in a Master Document which contains the information required to satisfy the Plan Preparation requirement of the TRA and O.Reg. 455/09. Therefore, this Technical Memorandum fulfills the requirements of s.18.2 of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11) for all of the following Plans:

- Toxic Substance Reduction Plan Nitric Acid Version 1.0;
- Toxic Substance Reduction Plan Nitrate Ion Version 1.0;



Planner Recommendation Requirements Under the TRA and O.Reg. 455/09

Section 18.2(3) of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11) provides the areas of a given Plan in which Planner Recommendations are required to be documented (the Areas of Recommendation). As required by s.18.2(4) of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11), a Planner must also provide a rationale for each Planner Recommendation. Implementing Planner Recommendations (if any) is voluntary.

As stated in s.18.2(2) of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11), Planner Recommendations shall be provided for the purpose of improving all aspects of the Plan, including:

- the potential for reducing the use and creation of the toxic substance at the facility; and
- the business rationale for implementing the Plan.

S.18.2(5) of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11) states that a Planner must provide a written explanation if the Planner is of the opinion that no recommendations are necessary with respect to any of the Areas of Recommendation.

Planner Recommendations

Planner recommendations under each of the mandatory recommendation categories are provided below, with accompanying rationale provided in *italics*.

Expertise Relied on in Preparing the Plan

Facility personnel from various departments and areas of responsibility, including purchasing, production, scheduling, environmental health and safety, and the management team were consulted at various stages to contribute to the compilation of the Plan. In order to potentially improve the plan in its future iterations, it may be worthwhile to extend requests for information pertaining to potential reduction options (including material or feedstock substitution and equipment or process modification) to the Canadian Food and Inspection Agency (CFIA). It is understood that the CFIA has strict requirements around cleaning and disinfection of equipment, so their input early in the toxics reduction planning process may prove helpful in the development of new options for reduction. Engaging the CFIA well in advance of the forthcoming regulatory deadlines for TSRP updates would likely be required for any successful collaboration.

Collaboration with CFIA may enable the consideration of other potential options that may lead to toxics use or creation reductions in line with CFIA expectations that may have otherwise been assumed to be infeasible due to regulatory requirements.

Identification and Description of Stages and Processes

No recommendations to improve this area of the plan can be provided.

The identification and description of stages and processes accurately reflect the operations.

Descriptions of How, When, Where, and Why a Substance is Used and/or Created

No recommendations to improve this area of the plan can be provided.

The descriptions provided for how, when, where, and why the substances are used and/or created at the Facility are interpreted to accurately reflect the operations.

Process Flow Diagrams

No recommendations to improve this area of the plan can be provided.

The process flow diagrams accurately represent the stages, processes and flow of toxic materials used and/or created at the Facility.

Data and Methods Used in Toxic Substance Accounting

No recommendations to improve this area of the plan can be provided.

The current accounting methods and data used accurately reflect the toxics use and creation at the Facility.

Analysis of Input/Output Balances

No recommendations to improve this area of the plan can be provided.

The inputs (and creation) and outputs (and destruction) are equally balanced and therefore no analysis of an imbalance was required.

Reduction Estimates Prepared for Each Identified Reduction Option

No recommendations to improve this area of the plan can be provided.

No reduction options have been provided as part of the Plan(s).

Technical and Economic Feasibility Analysis

No recommendations to improve this area of the plan can be provided.

No reduction options have been provided as part of the Plan(s).

Direct and Indirect Costs Associated with the Toxic Substance

The information provided for costs associated with the toxic substances meets all requirements; however, there may be other indirect costs attributable to toxics in the form of consultant fees or in-kind efforts related to toxics quantification and regulatory compliance (creating toxic substance reduction plans and submitting sewer discharge reports to the municipality, for example).

The main costs associated with the toxic substances come from the purchases of materials containing toxic substances; however, there may be other indirect costs that could potentially be attributed to nitric acid and nitrate ion which may be worthy of consideration in the future, when this plan is revisited.

Implementation Steps and Timelines and Likelihood of Them Being Achieved

No recommendations to improve this area of the plan can be provided.

No reduction options have been provided as part of the Plan(s).

Additional Technically and Economically Feasible Reduction Options Not Included

No recommendations to improve this area of the plan can be provided.

Due to the rigidity of CFIA specifications on the cleaning and disinfection requirements for equipment used in the food manufacturing industry, no additional reduction options can be provided at this time.

Closure

This Technical Memorandum provides the documentation required to satisfy s.18.2 of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11) with respect to the individual draft Plans listed within this document. It is recommended that a copy of this Technical Memorandum be appended to the final Master Document.

Yours very truly,

GOLDER ASSOCIATES LTD.



J. Michael Fabro, M.E.B., P.Eng.
Toxic Substance Reduction Planner
License No. TSRP0189



Keith G. Lesarge, M.Sc., P.Geo.
Principal

JMF/KGL/cr

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DATE December 13, 2014**PROJECT No.** 1406512-M02**TO** Prunelle Paquette
Saputo Dairy Products Canada G.P.**FROM** J. Michael Fabro**EMAIL** mfabro@golder.com**TOXIC SUBSTANCE REDUCTION PLANNER RECOMMENDATIONS ON THE
DRAFT DOCUMENT TITLED
“TOXIC SUBSTANCE REDUCTION PLAN FOR PARTICULATE MATTER, PM10 VERSION 1.0”**

Golder Associates Ltd. (“Golder”) was retained by Saputo Dairy Products Canada G.P. (“Saputo”) to provide various services pertaining to Phase I and II Toxic Substance Reduction Plan preparation under the Toxics Reduction Act (TRA), including Toxic Substance Reduction Planner recommendations (“Planner Recommendations”) for the facility located at 7 Riverside Drive in Trenton, Ontario.

Background

As required by s.18.2 of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11), a facility is required to provide a draft copy of the Plan to a licensed Toxic Substance Reduction Planner (“the Planner”) for the purpose of obtaining recommendations with respect to the Plan. This technical memorandum fulfills the requirements of s.18.2 of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11). This Technical Memorandum fulfills the requirements of s.18.2 of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11) for the following draft Plan:

- Toxic Substance Reduction Plan PM10 - Version 1.0.

Planner Recommendation Requirements Under the TRA and O.Reg. 455/09

Section 18.2(3) of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11) provides the areas of a given Plan in which Planner Recommendations are required to be documented (“the Areas of Recommendation”). As required by s.18.2(4) of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11), a Planner must also provide a rationale for each Planner Recommendation. Implementing Planner Recommendations (if any) is voluntary.

As stated in s.18.2(2) of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11), Planner Recommendations shall be provided for the purpose of improving all aspects of the Plan, including:

- the potential for reducing the use and creation of the toxic substance at the facility; and
- the business rationale for implementing the Plan.

S.18.2(5) of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11) a Planner must provide a written explanation if the Planner is of the opinion that no recommendations are necessary with respect to any of the Areas of Recommendation.



Written Explanation for No Necessary Recommendations

The Planner is of the opinion that no recommendations are necessary with respect to any of the Areas of Recommendation for the Plan.

The following written explanation is being provided by the Planner to Saputo under s.18.2(5) of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11) and satisfies the Facility's requirements for Planner Recommendations under s.18.2 of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11):

The Planner is of the opinion that no recommendations are necessary with respect to any of the matters listed in paragraph 1 to 6 of s.18.2(3) of O. Reg. 455/09 (as amended by s.10 of O. Reg. 214/11) for the Plan for the Toxic Substance. The rationale for this opinion is that the Planner is in agreement with the Plan's conclusion that the Facility has previously optimized its control of the activities which the TRA has defined as "creation" of the Toxic Substances to the greatest extent that can reasonably be expected, and therefore no toxic substance reduction options can be identified for prescribed Toxic Substances at the Facility. The Planner is of the opinion that there is little value in providing Planner Recommendations on a Plan that the Planner feels is compliant with the TRA and O. Reg. 455/09 for a substance whose creation cannot be possibly be reduced further under the TRA framework.

Closure

This Technical Memorandum provides the documentation required to satisfy s.18.2 of O.Reg. 455/09 (as amended by s.10 of O.Reg. 214/11) with respect to the draft Plan listed within this document. It is recommended that a copy of this Technical Memorandum be appended to the final Plan.

Yours very truly,

GOLDER ASSOCIATES LTD.



J. Michael Fabro, M.E.B., P.Eng.
Toxic Substance Reduction Planner
License No. TSRP0189



Keith G. Lesarge, M.Sc., P.Geo.
Principal

JMF/KGL/cr

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Toxic Substance Reduction Plans Certification by Highest Ranking Employee

As required by s.4(2) of the *Toxics Reduction Act* (TRA), Toxic Substance Reduction Plans must contain a certification, signed by the highest ranking employee at the Facility who has management responsibilities relating to the Facility.

The following Certification Statement is being made under s.19(2) of Ontario Regulation (O.Reg.) 455/09 (as amended by s.11 of O.Reg.214/11) and satisfies the requirements of s.4(2) of the TRA for the Toxic Substance Plans that are assembled within this single document as of the date of this Certification Statement. Furthermore, the following Certification Statement is limited to the respective versions of the Plans which are dated as indicated in the Certification Statement:

As of December 13, 2014, I, Trevor Braun, certify that I have read the toxic substance reduction plans for the toxic substances referred to below and am familiar with their contents, and to my knowledge the plans are factually accurate and comply with the Toxics Reduction Act, 2009 and Ontario Regulation 455/09 (General) made under that Act.

- *Nitric Acid Version 1.0 (December 13, 2014)*
- *Nitrate Ion Version 1.0 (December 13, 2014)*
- *Particulate Matter, PM10 Version 1.0 (December 13, 2014)*



Dec 23, 2014

Trevor Braun
Plant Manager
7, Riverside Dr., P.O. Box 627
Trenton, On, K8V 5R7
Saputo Dairy Products Canada G.P.

Date