Canada’s 2026 Chemicals Management Plan notices: What manufacturers, importers and users must know

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Environment and Climate Change Canada has issued mandatory Section 71 notices under the *Canadian Environmental Protection Act, 1999* (CEPA) covering 200 chemical substances. These notices require Canadian businesses to report 2025 calendar year activity data across two deadlines in 2027, with penalties of up to $500,000 for non-compliance. Reporting obligations extend beyond bulk chemical producers to manufacturers, importers, distributors and retailers handling components, mixtures or finished goods containing targeted substances.

On Aug. 29, 2026, the federal government published two mandatory information-gathering notices under paragraph 71(1)(b) of the *Canadian Environmental Protection Act, 1999* (CEPA):

- Notice with respect to certain substances under the Chemicals Management Plan — 2026 Phase 1
- Notice with respect to certain substances under the Chemicals Management Plan — 2026 Phase 2 (the CMP Notices)

Key takeaways

- The CMP Notices are mandatory and cover 200 substances across two reporting phases;
- The relevant activity period is the 2025 calendar year;
- Phase 1 reports are due March 3, 2027;
- Phase 2 reports are due Sept. 8, 2027;
- The CMP Notices cast a wide net – reporting can be triggered by substances in imported goods and by manufacturing uses, not only by bulk chemical manufacture or import; and
- Supply-chain outreach and data collection should begin well before the applicable deadline.

Overview of the CMP notices

The CMP Notices support federal prioritization, risk assessment and risk management under the Chemicals Management Plan. They require information in a respondent's possession or to which it may reasonably be expected to have access, which may include making enquiries up the supply chain in certain cases.

- **Phase 1:** covers 184 substances. The reporting period opened Aug. 29, 2026, and closes March 3, 2027; and
- **Phase 2:** covers 16 substances. The reporting period opens March 4, 2027, and closes Sept. 8, 2027.

Together, the CMP Notices cover 200 substances and require affected businesses to report activities during the 2025 calendar year.

Businesses should begin screening their Canadian operations and supply chains now, as the notices apply well beyond traditional chemical manufacturers.

Who is required to report?

A person may be required to respond if, during the 2025 calendar year, they manufactured, imported or used a listed substance above the applicable threshold. Depending on the substance and activity, reporting may be triggered when the substance was present alone, in a mixture or product, in certain manufactured items or used in manufacturing a good, even if the substance is not present in the finished good.

The principal quantity thresholds vary, but in general, the CMP Notices use thresholds of more than 100 kg for Part 1 and Part 4 substances and more than 1,000 kg for Part 2 substances, under Schedule 1 of the CMP notices, which lists the targeted substances. Imports of covered mixtures, products or specified manufactured items are generally assessed at a concentration of at least 0.1 per cent by weight. Part 3 substances are subject to substance-specific applications and criteria. Because scope depends on the substance, activity, concentration, quantity and, in some cases, product category or application, businesses should assess each listed substance against the relevant part of the applicable notice rather than relying on a single enterprise-wide threshold.

The breadth of the CMP Notices means that potentially affected entities may include manufacturers, formulators, distributors, retailers and importers in sectors such as automotive and transportation, construction, electronics, industrial products, consumer goods, cosmetics, food-related products and packaging, and other operations that use chemical inputs. Certain activities and goods may be excluded or differentiated. Review these provisions carefully before concluding that no response is required.

Organizations that are not required to report under the CMP Notices, for example, because they do not meet the required thresholds, or otherwise have an interest in a listed substance, may voluntarily submit a Declaration of Stakeholder Interest and provide any additional information they consider relevant. Organizations with no involvement or interest in any of the listed substances may instead submit a Declaration of Non-Engagement.

What information must be reported?

The required information varies by substance and activity, but may include:

- Substance identity and applicable Chemical Abstracts Service Registry Number;
- Quantities manufactured, imported or used;
- Concentrations and functions of the substance;
- Goods, applications and end uses associated with the substance;
- Facility information, including releases where requested;
- Commercial status and other supply-chain information; and
- Information responsive to substance-specific questions in the applicable schedule.

What should businesses do now?

1. **Screen the substance lists**. Compare the 200 listed substances against purchasing, import, production, formulation and product-composition records for 2025;
2. **Map relevant activities**. Determine whether each substance was manufactured, imported or used, including through mixtures, products, manufactured items or manufacturing inputs;
3. **Engage suppliers early**. Request composition, concentration and quantity information from domestic and foreign suppliers, and document follow-up efforts where information is incomplete;
4. **Assess thresholds and exclusions**. Apply the criteria in the relevant part of Schedule 1 on a substance-by-substance basis;
5. **Identify information reasonably accessible**. Coordinate legal, environmental, procurement, operations, product stewardship and IT teams to locate responsive records;
6. **Prepare and validate the response**. Use the applicable Excel Reporting File and submit a separate response for each phase through Environment and Climate Change Canada's Single Window; and
7. **Address timing and confidentiality**. If necessary, request an extension before the applicable deadline and identify information for which a substantiated confidentiality request should be made.

Extensions, confidentiality and enforcement

The Minister may extend the reporting deadline on written request made before the applicable deadline. A respondent may also request that submitted information be treated as confidential under section 313 of CEPA, but the request must include supporting reasons. Businesses should consider confidentiality at the outset so that commercially sensitive formulations, supplier information and trade secrets are identified and supported consistently.

Failure to comply with a section 71 notice is an offence under CEPA and may lead to enforcement action and penalties of up to $500,000 for a first offence. Responses should therefore be complete, accurate and supported by a defensible record of the screening process, assumptions, supplier outreach and data validation. Where information is unavailable, the organizations should document the steps taken to determine whether it was in their possession or reasonably accessible.

How BLG can help

Navigating and responding to section 71 notices can be cumbersome and complicated. BLG's Environmental and Regulatory Group helps businesses determine whether the notices apply, conduct substance and supply-chain reviews, interpret threshold and data requirements, prepare responses or extension requests and protect confidential business information.

Chemical management obligations increasingly require businesses to obtain reliable information about substances and products across their supply chains. BLG helps clients entering or operating in the Canadian market proactively identify potential reporting obligations, establish supply-chain due diligence processes and develop contractual provisions requiring suppliers to provide and update the information needed for regulatory compliance.

Please contact any of the authors or key contacts listed below to discuss how the CMP notices may affect your organization.

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