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The Toronto Industry Network

April 8, 2008

Dr. Monica Campbell
Manager, Environmental Protection Office
Toronto Public Health
Environmental Reporting and Disclosure Program Consultation
c/o 277 Victoria Street, 7th Floor
Toronto, ON M5B 1W2
publichealth@toronto.ca

Dear Dr. Campbell:

Re: Response to the Toronto Public Health Environmental Reporting and Disclosure Proposal

Toronto Industry Network (TIN) welcomes the opportunity to comment on the Toronto Public Health (TPH) Environmental Reporting and Disclosure Proposal Consultation Document.

After a thorough review of the consultation document and careful consideration, TIN cannot support the TPH proposal in its current form. TIN urges the TPH to integrate your proposal with existing Government regulations to ensure the resulting data is not duplicative of other programs. TIN proposes an alternative approach that focuses on the reduction of emissions and is harmonized with Federal and Provincial legislation for reporting purposes.

The attached TIN document is an example of the working environment that TIN membership supports. We have provided recommendations and alternatives that we hope will be seen as positive feedback on the TPH proposal. The overall objective of the TIN document is to consider all approaches and to investigate a broader more proactive strategy, which takes into consideration the burden of reporting, capacity of addressing community concerns, etc. TIN believes it is imperative that major stakeholders work together to provide a welcoming and supportive environment for business to succeed in Toronto, given the highly competitive nature of business today.

The Toronto Industry Network thanks TPH for this opportunity to comment and provide constructive feedback. We look forward to continuing dialogue on this matter. If you have any questions of a technical nature, please feel free to contact J.B. Boughs at (416) 667-6700 ext.2952.

With respect,

Andrew Judge
Chair of Toronto Industry Network

J.B. Boughs, CRSP
Toronto Industry Network

Cc: Mayor David Miller, Toronto City Councilors, Dr. David McKeown

Strategic Response to the Municipal (Toronto)
Environmental Reporting and Disclosure Consultation
Document
(Community Right to Know)

Developed by:
The Toronto Industry Network

With Assistance from:
Canadian Manufacturers and Exporters (CME)
Canadian Federation of Independent Business (CFIB)

April 8, 2008

EXECUTIVE SUMMARY

Toronto Industry Network (TIN) supports the need for companies to reduce their environmental footprint and continue to improve the dialogue within the communities in which they operate.

TIN is concerned that the Toronto Public Health's (TPH) proposal does not show benefits that will accrue to Torontonians. Similarly, a major drawback of the proposal is its failure to show financial and other impacts on affected stakeholders.

The TPH proposal overlaps with similar programs sponsored by the federal and provincial governments already in place or being developed. TIN recommends that TPH work with the Federal and Provincial governments to integrate their proposal with existing and planned programs. TIN prefers the federal government approach of encouraging industrial sectors to change practices so that change occurs from the top down in an orderly, timely manner.

Several of the 25 chemical substances identified by TPH for reporting by businesses are no longer manufactured and/or used commercially in Toronto, e.g. Vinyl chloride and 1,3-Butadiene. Based on a comparison of provincial and federal statistics generated from NPRI, businesses in the City of Toronto represent only one-third of the total releases of certain compounds in the GTA. If all NPRI emissions in Toronto were eliminated the exposure to the remaining two-thirds of emissions in the GTA would still exist. For example, for volatile organic compounds (VOCs), 2006 NPRI data lists only 7.3 kilotonnes in Toronto and 21.3 kilotonnes in the GTA (see Appendix A for details).

One third or less of the GTA's emissions of smog precursors are attributed to Toronto NPRI reports. It should be noted that sources outside of Toronto are significant contributors to Toronto smog precursors. This demonstrates the proposal by TPH will not meet the City's needs.

TIN has a real and justifiable concern with public security issues that arise when sensitive data are made public. Other concerns include the possible and inappropriate release of competitive and/or patent protected information to third parties.

TIN recommends that TPH abandon the traditional by-law approach and work with other City divisions to develop an incentive package that will encourage businesses to reduce their environmental footprint. This would show enlightenment and innovation making business a willing partner, rather than an unwilling participant. The public interest will be served and the business community can invest positively rather than spend its scarce resources on collecting and reporting more data.

TIN has included recommendations and alternatives that will support TPH and the City of Toronto to meet their goals and objectives.

RECOMMENDATIONS

TIN recommends that:

- **TPH evaluate the degree of overlap between the substances TPH has selected for reporting** versus current or proposed provincial and federal regulations. This review would facilitate the development of an emission reduction timetable (as opposed to relying on public disclosure alone), as well as establishing goals that are in line with provincial and federal regulations.
- **TPH review existing provincial and federal regulations to identify potential synergies for reporting and management efforts.** The costs and benefits of a harmonized approach need to be compared to the TPH proposal. This effort should be undertaken with all potential stakeholders to determine the feasibility of TIN's alternate approach.

- **TPH harmonize the City's goals with respect to the establishment of reduction targets and risk management procedures of the provincial and federal regulations.** Most of the substances included in the City's inventory of 25 substances are the subject of existing or emerging provincial and/or federal regulations. By utilizing the risk management information that will follow, greater effort can be placed on the reduction of emissions which is the ultimate goal of the proposal.
- **TPH explore existing venues for gathering information and work to strengthen those venues through education and training.** For example, make concerned citizens aware that they have the right to ask the Ministry of the Environment for information regarding odours or emissions from neighboring facilities.
- **TPH utilize the existing reporting done through NPRI** in order to avoid the duplication (for those organizations already reporting) of reporting data to different orders of government. This will ensure consistency and will avoid costly duplication of reporting and the systems required to communicate the information. TIN recommends that TPH review the requirements of Ontario's Environmental Protection Act and the air approval requirements of the Ministry of the Environment.
- **TPH to investigate the progress made with regard to Canada's Chemical Management Plan (CMP) under CEPA 1999 and become involved in the process.** The Federal Government requires the assessment of every substance made in or imported into Canada since 1994. Chemical substances that have entered Canada or have been in use before 1994 are considered to be *existing substances*. By 2006, the Federal Government completed a categorization of 23,000 *existing substances* (the Domestic Substance List) (http://www.ec.gc.ca/CEPARegistry/subs_list/domestic.cfm or DSL) through a process called "Categorization and Screening" to identify whether the substance met the requirements as persistent, bioaccumulative or inherently toxic to humans or the environment.

Key objectives of the CMP are as follows.

- To significantly strengthen the existing substance risk management regime
 - To integrate government activities (i.e. strengthen coordination of CEPA with other federal statutes);
 - To establish government accountability;
 - To strengthen industry's role in proactively identifying and safely managing risks associated with chemicals they produce and use.
- **TPH conduct a detailed review of the Ontario Occupational Health Safety Act (OHSA) paying specific attention to regulations that support the Worker's Right to Know (WHMIS).** Under these regulations, employers have a direct responsibility to identify any hazardous materials that are being brought onto their sites and to make this information available to their workers. This is done through the use of Material Safety Data Sheets (MSDS), training, and procedures that identify hazards and provide further information on the safe handling, storage and disposal of these chemicals, which could include the use of Personal Protective Equipment (PPE). TIN believes that consulting with appropriate Ministry of Labour officials would alleviate some of TPHs' concerns relating to potential worker exposure.
 - **TPH work closely with other divisions within City Hall to find a better way of achieving the goals of reducing emissions.** This is an issue that has much wider implications than public health. The long list of regulations at all levels required to open or refurbish a manufacturing facility in Toronto is daunting. TIN has provided a list of permits, regulatory submissions and responses that are required (Appendix C). This list is extensive and requires a significant amount of information that may assist the TPH in meeting their objectives without additional by-laws.

- **TPH meet with and seek the advice of Environment Canada (EC).** For the past 10 years, EC has been administering the NPRI program. The program has evolved from a regulated right-to-know reporting system to a risk management approach to encourage reductions in industrial emissions. EC, in consultation with the provinces, industry and non-governmental organizations, has discussed opportunities for expanding the number of businesses that currently report to NPRI. Expanding reporting raises several challenges, which vary depending upon the type of industry, the size of the operation and the nature of the emissions to be reported. Ensuring data integrity (quality) is a significant challenge for the government and even large companies with dedicated reporting resources may have challenges reporting. Thus, ensuring that there is adequate capacity in SMEs to report is an important consideration when attempting to design a reporting system that can produce reliable and realistic numbers for the City of Toronto. The TPH proposal does not indicate how this capacity will be developed or how business would be expected to respond to the challenges.
- **TPH clarify whether other alternatives, their costs and benefits have been considered.** The Federal Regulatory Policy includes a provision for a review of various options to address a problem and includes a regulatory impact assessment (RIA) in order to establish the costs of one option versus others and to ensure that the benefits outweigh the costs. TIN suggests that following a similar approach could add considerable value if conducted in consultation with other levels of government and other stakeholders.

PROPOSED ALTERNATIVE

TIN challenges TPH and its stakeholders to look outside the box and beyond the traditional by-law approach that in this case applies an onerous and punitive burden to business for little perceived benefit. For companies not currently reporting emissions, TIN recommends as an alternative to a by-law that TPH investigate programs, particularly for SMEs to build on the desire of most businesses to reduce their environmental footprint. It is a much more positive thing to encourage businesses to spend money on reducing their collective environmental footprint than on producing data for a poorly defined purpose.

The City could develop exciting, cross-divisional programs that would inform the public and positively encourage business to change its environmental practices. Toronto would be seen as a real leader. Such a program could include resources such as training and education as well as incentive based programs such as tax incentives or funding mechanisms for chemical management and pollution prevention planning.

A Mayor's Competition on Environmental Excellence rewarding the most improved companies could be developed. These suggestions are consistent with the Green Economic Development Plan prepared by the Toronto's Economic Development Division, as well as the City's Green Strategy, which was endorsed by the Mayor and Council. A capacity building program will encourage businesses to continue to operate within the City of Toronto and provide them with the tools they need to minimize their environmental impacts and provide incentives to those that do. It is interesting to note that Toronto's voluntary and incentive-based water conservation programs for business have been hugely successful.

Additional ideas include the following:

- Consider participating in and expanding the concept of existing Community Awareness and Emergency Response (CAER) organizations to include education and promotion to the small business community to assist them in applying existing legislation to better inform their workers and developing environmental strategic initiatives with their suppliers. It is the opinion of TIN that education of these programs is a benefit rather than implementing a by-law that may be misinterpreted by the small business community.
- The City may consider further supporting volunteer groups that network small businesses by sharing information and strategies to help them be successful in occupational and environmental programs.

- The City may want to consider funding educational programs delivered by City staff that support the small business community in achieving their objectives rather than increasing the number of inspectors. These people can function as facilitators, educators, coaches and mentors.

TORONTO INDUSTRY NETWORK (TIN) OVERVIEW

The Toronto Industry Network (TIN) represents a wide range of companies with more than 35,000 employees working in manufacturing in the City of Toronto with representation from the food, aerospace, plastics, paper-making, chemical and recycling industries. We make an important contribution to and help diversify the employment base of our City. Through our products and services, we support a much broader employment base in the GTA and the rest of Ontario. A significant part of our production is exported. We have a keen interest in the development of sound public policy and want to work closely with all governments while providing input on issues to allow for informed decision making.

In partnership with the City, the Network wants to strengthen and foster growth in the City's industrial and commercial base. Manufacturing helps bring economic diversity to Toronto that in turn helps provide economic strength and resilience. Toronto provides an essential anchor for industrial and commercial activity in the GTA and Ontario because of its size and the number of head offices. Toronto must continue to improve its competitiveness profile not only with the 905 regions but also with other jurisdictions in North America where many of our sister plants are located. The health of Toronto's industrial/commercial base has significant impacts on the rest of the Country.

TIN is engaged with the City regarding issues such as the protection of employment lands, improving the competitiveness of Toronto in relation to other North American cities, the greening of manufacturing and the reduction of the regulatory burden on business.

A number of TIN members have considerable expertise on how environmental regulations and policy are interpreted and applied and review on an ongoing basis emerging issues that may have a business and environmental impact. Given the competitive nature of business, TIN members believe that it is imperative that major stakeholders work together to provide a welcoming and nurturing environment for business to succeed in Toronto.

OVERVIEW OF TPH COMMUNITY RIGHT TO KNOW

On January 7, 2008, Toronto Public Health released its draft Community Right-to-Know (CRTK) by-law consultation document entitled *Environmental Reporting and Disclosure - Consultation Document on a Proposed Program for Toronto*. The proposed by-law would make companies of all sizes (Approximately 8, 000 in Toronto of which 300 are currently reporting under the National Pollutant Release Inventory - NPRI) that emit a set of 25 chemical categories (Appendix B) be legally required to track, report, and potentially create a pollutant reduction strategy. The overall objective is being framed in the advancement of health and well being of the community.

Consistently, TIN has supported the concept that the public be able to access information within the appropriate context about chemicals used by business. Companies belonging to the Canadian Chemical Producers' Association already do this through their Responsible Care[®] program. The Community Awareness and Emergency Response (CAER) groups operating within the City provide information to local residents about the chemicals used by companies in the CAER organizations and how these are managed particularly during emergencies. Citizens may make inquires about the environmental impacts of neighbouring businesses by reaching the Ministry of Environment (MOE). Many businesses have Certificate of Approval granted by MOE and the Ministry follows up on complaints received.

COMMENTARY

- For many TIN member companies, the TPH proposal would duplicate what these companies already provide for the federal and provincial governments through NPRI that is administered by Environment Canada. Both Federal and Ontario governments are engaged in making very significant revisions to their chemical monitoring and reduction programs. Experience demonstrates that it is more cost-

effective to monitor large emitters, as there is a sharp reduction in the efficiency of data collection from smaller emitters.

- An area of concern to manufacturers is the growing number of municipalities that enact their own environmental legislation that competes with federal and/or provincial regulation. This increases the cost and complexity of compliance which in turn can affect the competitiveness of Toronto's companies selling into the rest of Canada. One of Canada's strengths has been the harmonization and coordination of federal and provincial regulation in a number of areas affecting manufacturing.
- It will be hard to measure the benefits of any program Toronto introduces in light of what is being done by the other governments. Further, given that half of the pollution in Toronto's airshed comes from outside the City's boundaries, the contribution by large manufacturers and SMEs is small in comparison.
- Following on the previous point, there is substantial cost involved to businesses required to comply with a reporting by-law both in start-up and ongoing expenses. We estimate the current cost of reporting annually in the range of \$2,000 – 5,000 per business facility. Accurate emissions modelling and reporting is a sophisticated and complex science. TPH proposes to lower chemical reporting thresholds to 1% of that required by the federal and Ontario governments to capture very small emitters. This also will have a major impact on even large companies as it will complicate their reporting requirements and substantially increased reporting compliance costs.
- A blanket by-law compelling all but exempted businesses that use chemicals to report usage and emissions will be costly to administer, be very disruptive and difficult to enforce. The federal government strategy to reduce or eliminate toxic chemical use is to encourage large companies that use targeted toxic chemicals to change their practices over time. This causes a trickle-down effect to their customers and others. A good example of this can be found in the auto refinishing industry. Autobody shops are changing to water-based rather than solvent-based paints as a result of auto paint manufacturers being required to change their formulations. The effect is to reduce the economic dislocation that business would experience yet achieve environmental improvements over time.
- There is a significant security concern and the proposal does not clearly distinguish between information that is to be reported to the public and information that the City wishes to collect but keep private. Companies are required to provide certain data about their operations to emergency responders but these are kept on site at the facility.
- TIN does not support the inclusion of 'use and storage' in the reporting requirements included in the proposal. The use of chemicals does not equate to release. TIN members believe that the reporting of this information would result in disclosure of commercially confidential information.
- If a by-law requiring reporting emissions data is passed by Toronto Council, this will cause uncertainty in the business community and amongst manufacturers in particular. The uncertainty is caused by the threat of other by-laws banning chemical substances as a likely progression of the reporting by-law. Business looks for certainty when making investment decisions. Business prefers to have the national and provincial governments regulate in this field.

CLOSING QUESTIONS

In addition to the analysis and proposed approach provided, TIN has the following outstanding questions:

- Has the TPH conducted a cost benefit analysis? Have they determined how much this program will cost the city? How much will it cost the business community? If this information has been determined has it been made available to the public?
- Will SMEs need to retain air emission experts to measure and calculate their emissions?
- If reporting does become mandatory, has the TPH considered that an annual report may be an unreasonable burden?
- How will TPH help the general population understand the risk posed by emissions from reporting sources in comparison to the risks proposed by exempt sources and those outside the City?
- Has the TPH determined what impact this proposal would have on property values?
- If reporting is required to be electronic how are SMEs going to satisfy this requirement? Has TPH determined how many SMEs have limited or no computer access?
- Will information be required to be made available in French and English or other languages?
- What risk analysis has the TPH conducted to determine if the released material is actually posing a risk to the health of Torontonians?

ADDITIONAL BACKGROUND FOR THE ANALYSIS:

- Background material produced by Canadian Environmental Law Association (CELA) and Lura Consulting, as well as, TPH material has noted that increasing access to information on toxics is responsible for significant reductions in emissions from industry. While this is likely partially true¹, the period in time with which those reductions occur is decidedly long in the examples provided (e.g. 11 years in the U.S. Toxic Release Inventory (TRI) experience). It is also not clear whether the reductions have occurred due to public access to information or whether these reductions were a result of other regulatory actions of government and voluntary actions of industry e.g., voluntary Accelerated Reduction and Elimination of Toxins (ARET).
- Concerns of small and medium sized businesses with respect to their capacity to respond to monitoring have been highlighted in several communications, in particular those involving the CME, CFIB and TIN. Another aspect of the capacity issue will be the ability for small and medium sized enterprises (SMEs) to respond to community representatives as community involvement with emissions information increases over time.
- Experience in the U.S. during the later stages of the Toxics Release Inventory (TRI) roll out to States and Communities saw the EPA investing significant resources in order to give non-governmental organizations and community groups the expert information they required to interpret TRI information. Past interviews with experts such as Wilma Subra² from Louisiana noted that this expert advice was critical in order to allow community groups to navigate the complex areas of toxic emissions and public health threats, as well as, to prompt specific discussions with industry emitters on efforts to reduce emissions. The question of availability of

¹ It is unclear whether the associated reductions in TRI and NPRI tracked substances were ever effectively evaluated against other regulatory and voluntary initiatives that were happening concurrently with efforts to expand the dissemination of information to the public.

² Wilma Subra won a Presidential award in the 90s for her work with community groups helping them to take action with business to address emissions reported through the TRI.

³ CEPA gives the Minister the authority to share correspondence and compliance information but not actual targets or reduction strategies.

resources to support this advisory capacity, either for community groups or for business is an outstanding question.

- As identified in the CELA report, ongoing efforts to provide information to the public such as pollution prevention plans have proven largely ineffective as a result of limitations of CEPA³. Thus, efforts to enhance disclosure of emissions may serve to exacerbate an existing gap in information. This limitation suggests that without addressing the management of toxics, additional information on emissions made available to the community may only serve to further frustrate the public who are likely equally interested in what businesses are doing to curb emissions.

Appendix A: Analysis of NPRI data

Table 1 indicates the 2006 NPRI reported air releases of some of the substances included in the proposal. Included are total Canada, total Ontario, total GTA and total Toronto air releases. The NPRI numbers capture the large emitters, it is doubtful that many large emitters have fewer than 10 full time equivalent employees and escape reporting.

VOCs, PM2.5 and NOX are smog precursors that impact the regional air shed. One third or less of the GTA's emissions of these smog precursors are attributed to Toronto's NPRI reporters. Sources exempted in the proposal and sources outside of Toronto are significant contributors to Toronto's smog precursors.

The information in Table 1 provides some useful insights into some of the substances proposed.

- 1,3-Butadiene – is a flammable gas with no NPRI emissions reported in Toronto. Due to the extreme hazard of this substance, it is difficult to imagine any small (< 10 employees) facilities handling it. Perhaps it would make sense to ask the manufacturers/suppliers of this substance if it is sold in small cylinders to facilities in Toronto.
- Benzene – the GTA's largest emitter is in Mississauga. Toronto's largest emitter is 1% of the GTA's largest emitter and because it is a fuel distribution depot, it would be exempt from reporting.
- Carbon tetrachloride – negligible emissions reported in Ontario and none in Toronto.
- Lead and its compounds – most lead releases to air are from mining companies, located far from the GTA. Toronto has emitters but again they account for less than 1/3 of the GTA's total.

Table 1 - 2006 Air Releases Reported to the NPRI - Selected Substances

Substance	Canada (t)	ON (t)	GTA (t)	Toronto (t)
VOCs	271,101	67599	21295	7310
PM 2.5	62679	17108	1341	489
Oxides of nitrogen (NO2)	825675	113525	7906	1688
Formaldehyde	2177	660	44	18
Carbon tetrachloride	0.043	0.001	0.001	0
Benzene	810	317	17	0.196
1,3-Butadiene	70	43	0.045	0
Lead (and its compounds)	261.3	94	1.48	.47

The above data suggests that the proposed emission inventory would collect little useful information on the substances listed in Table 1.

Details on emitters can be found through the NPRI report.

Appendix B: Chemicals to be tracked under the proposed Environmental Reporting and Disclosure Program

The program would track the following 25 chemicals, which are commonly used or produced in certain business operations:

Acetaldehyde	Formaldehyde
Acrolein	Lead
Benzene	Particulate matter 2.5 (PM2.5)
1,3-Butadiene	Manganese
Cadmium	Mercury
Carbon tetrachloride	Nickel
Chloroform	Nitrogen oxides (NOx)
Chromium (hexavalent)	Polycyclic aromatic hydrocarbons (PAHs)
Chromium (non-hexavalent)	Tetrachloroethylene (perchloroethylene)
1,4-Dichlorobenzene	Trichloroethylene
1,2-Dichloroethane	Vinyl chloride
Dichloromethane	Volatile organic compounds (VOCs)
Ethylene dibromide	

Note: this substance list has been revised since being identified in the July 2007 Board of Health report. Information about this revision will be included in the draft plan.

Appendix C: New Building Permitting Requirements

<input type="checkbox"/>	Demolition Permit (City of Toronto) <ul style="list-style-type: none"> • Ensure hazardous substances are cleared before demolition • Effects on nearby facilities • Demolition methodology • Heritage Buildings will be identified through this process
<input type="checkbox"/>	Building Permit (City of Toronto) <ul style="list-style-type: none"> • Building Permits regulate various types of building construction that are allowed in the community and ensure that they meet all building standards.
<input type="checkbox"/>	Occupancy Permit (City of Toronto) <ul style="list-style-type: none"> • Ensures that the facility meets the Ontario Building Code Requirements • Allows safe occupancy
<input type="checkbox"/>	Notice of Project <ul style="list-style-type: none"> • Informs the Ministry of Labour of the type of construction activity • Projects which have value of >\$50,000.00
<input type="checkbox"/>	Permits for Utilities Shut-off <ul style="list-style-type: none"> • Notification and approval to shut off gas, water or electricity
<input type="checkbox"/>	Locates <ul style="list-style-type: none"> • Identification of utilities and communication cables
<input type="checkbox"/>	Tree Permits <ul style="list-style-type: none"> • Application to the City of Toronto when planning on removing trees from the property
<input type="checkbox"/>	Geotechnical survey <ul style="list-style-type: none"> • Analysis of existing ground conditions
<input type="checkbox"/>	Waste disposal permits <ul style="list-style-type: none"> • Includes an application for a generator number when disposing of hazardous wastes (asbestos, lead, mercury, etc)
<input type="checkbox"/>	Fire Marshall/Fire Department Approval <ul style="list-style-type: none"> • Review and approval of sprinkler layout drawings • Fire exits
<input type="checkbox"/>	Certificate of Approval requirements <ul style="list-style-type: none"> • Noise, air and water • Analysis of chemicals • Equipment noise specifications • Emissions • BTU ratings
<input type="checkbox"/>	Environmental Survey <ul style="list-style-type: none"> • Identification of any historical environmental issues (eg. Contamination)
<input type="checkbox"/>	Technical Standards and Safety Authority (TSSA) Inspection <ul style="list-style-type: none"> • Gas lines, pressurized steam lines, pressure vessels • Elevators, escalators
<input type="checkbox"/>	Electrical Safety Authority (ESA) Inspection <ul style="list-style-type: none"> • Approval on all electrical components
<input type="checkbox"/>	Requests for Variances
<input type="checkbox"/>	Pre-Start Health & Safety Reviews <ul style="list-style-type: none"> • New or modified equipment, processes or facilities
<input type="checkbox"/>	City of Toronto Inspections <ul style="list-style-type: none"> • Structural/foundation • Mechanical • Plumbing
<input type="checkbox"/>	FM Global Requirements <ul style="list-style-type: none"> • Review and approval of fire protection sprinkler layout • Review and approval of exterior building envelope materials • Roof materials

This demonstrates the amount of information an organization must provide in order to achieve permission to do business.