

Appendix A TRA Plan Summary – Copper

Basic Facility Information		
Name & CAS # of Substance	Copper	7440-50-8
Substances for which other Plans have been prepared	Nickel	7440-02-0
	Manganese	7439-96-5
	Chromium	7440-47-3
	Zinc	7440-66-6
Facility Identification and Site Address		
Company Name	Martinrea International Inc.	
Facility Name	Martinrea Tillsonburg	
Facility Address	Physical Address:	Mailing Address: (if different)
	301 Tillson Avenue Tillsonburg, Ontario N4G 5E5	
Spatial Coordination of Facility	522157 E 4747289 N; Zone 17	
Number of Employees	85	
NPRI ID	11835	
Ontario MOE ID Number	N/A	
Parent Company (PC) Information		
PC Name & Address	Martinrea International Inc. 30 Aviva Park Drive Vaughan, ON	
Percent Ownership for each PC	L4L 9C7 100%	
Business Number for PC		
Primary North American Industrial Classification System Code (NAICS)		
2 Digit NAICS Code	33 – Manufacturing	
4 Digit NAICS Code	3363 – Motor Vehicle Parts Manufacturing	
6 Digit NAICS Code	336390 – Other Motor Vehicle Parts Manufacturing	
Company Contact Information		
Facility Public Contact	Debbie Carr HR/Environmental Manager	Same address as facility
	debbie.carr@martinrea.com	
	Phone: 519-688-3693	
	Fax: 519-688-1021	
Facility Technical Contact	Same as Public Contact	Same address as facility
Company Coordinator Contact	Same as Public Contact	Same address as facility

Person who Prepared the Plan: (if different from the Coordinator)	Robert Morgan, M.A.Sc., B.Eng.	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
	Environmental Consultant	
	robert.morgan@GHD.com	
	Phone: 519- 884-0510 ext. 2337	
Highest Ranking Employee	SteveKopp General Manager	Same as facility address
	steve.kopp@martinrea.com	
	Phone: 519-688-3693 ext. 232	
	Fax: 519-688-1021	
Planner Information:		
Planner Responsible for Making Recommendations	Erik Martinez, P.Eng.	GHD Limited 651 Colby Drive Waterloo, ON N2V 1C2
	Environmental Consultant	
	Planner License No. TSRP0005	
	erik.martinez@GHD.com	
	Phone: 519- 884-0510 ext. 2342	
Planner Responsible for Certification	(same as planner responsible for making recommendations)	

Toxic Reduction Policy Statement of Intent

Martinrea International Inc. (Martinrea) is committed to playing a leadership role in protecting the environment. Whenever feasible, we will reduce the use and releases of Copper in compliance with all Federal and Provincial Regulations.

Reduction Objectives

Martinrea prides itself on technological innovation in order to produce high quality automotive parts in an environmentally responsible manner. Through this Plan, Martinrea will determine the technical and economic feasibility of each option to determine which, if any, are viable for implementation at this time.

Description of Facility

Martinrea International Inc. is a leader in the global automotive sector. Martinrea, the Facility, is located in Tillsonburg, Ontario and manufactures automotive parts and related components.

Toxic Substance Reduction Options

After looking into the seven categories of toxic substance reduction options, no options were identified. Explanations are provided in the table below to detail why an option could not be identified in each category.

Toxic Substance Reduction Category	Option: Identification and Description
1) Materials or feedstock substitution	No option identified: Martinrea's clients are major automotive companies. The raw materials to be used by Martinrea are specified by the customer, and there are limited sources where the material can be purchased from. The material used and the composition of the material are not in Martinrea's control.

Toxic Substance Reduction Category	Option: Identification and Description
2) Product design or reformulation	No option identified: The product design is completely specified by the customer and is not within Martinrea's control. While the Facility equipment is owned by Martinrea, they cannot change the size of the part produced. The amount of scrap generated at the Manufacturing Stage is monitored and ways to reduce the amount generated are encouraged.
3) Equipment or Process Modification	No option identified: Martinrea conducts regular preventative maintenance on all equipment to ensure it is operating efficiently. The equipment involved are optimized to a degree to ensure that a minimum amount of scrap is produced. Currently, the Facility has installed tip dressers at the spot welding equipment. The tip dressers allow for longer use out of the copper caps. The redressing of the caps allows for use approx. 3-4 times before changing. The money spent on the tip dressers is recouped in the reduction of copper caps being purchased.
4) Spill and Leak prevention	No option identified: All Copper used in the raw materials at the Facility is contained in metals. Spill and leak prevention is not a concern and no possible reduction options were identified in this category that would result in a reduction in the use of Copper.
5) On-site reuse or recycling	No option identified: All metal scrap generated at the Facility is recycled. Martinrea is paid for all scrap metal, and therefore the recovery of scrap metal has already been optimized. Martinrea re-works off-spec parts into the processes where possible. Any parts that are unable to be re-worked are recycled.
6) Improve inventory management or purchasing techniques	No option identified: Martinrea's inventory is controlled by customer demand. The Facility has limited inventory at any given time, which addresses any issues of stock rotation (additionally, metal does not have an expiry date).
7) Training or improved operating practices	No option identified: Employees are trained on each piece of machinery, and the requirements for every part that the Facility produces. Work instruction and quality control documents are posted at every work station. Employees are trained on any changes or updates to the production of parts. Martinrea conducts continuous improvement meetings and production meetings to ensure issues are dealt with and communicated as soon as possible to ensure the quality of parts are in conformance with the customer demands.

Plan Summary Statement

This plan summary accurately reflects the content of the toxic substance reduction plan for the use of Copper.

Certification by Highest Ranking Employee

Attached.

Certification by Licensed Planner

Attached.

9. Plan Certifications

9.1 Certification by Highest Ranking Employee

As of December 16, 2015, I, Steve Kopp, certify that I have read the toxic substance reduction plan for the toxic substance referred to below and am familiar with its contents, and to my knowledge the plan is factually accurate and complies with the *Toxics Reduction Act, 2009* and Ontario Regulation 455/09 (General) made under that Act.

[Copper]



Steve Kopp
General Manager

12-16-15

Date

As of December 16, 2015, I, Erik Martinez certify that I am familiar with the processes at Martinrea 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 plan dated December 16, 2015 and that the plan complies with that Act and Ontario Regulation 455/09 (General) made under that Act.

[Copper]



Erik Martinez, P.Eng.
Toxic Substance Reduction Planner
License No. TSRP0005

Dec 16, 2015

Date