

TOXIC REDUCTION PLAN SUMMARY

Facility Information

Name of Substance: Copper
CAS Number of Substance: NA-06
NPRI Identification Number: 2396
Ontario Regulation 127/01
identification number, if assigned:
Company Name: Great Lakes Copper Inc.
Facility Name: Same as Company Name
Facility Address: 1010 Clarke Road
P.O Box 7515
London Ontario
N5Y 5S6

Mailing Address, if different:
Number of Full-time Employees: 297
Two Digit NAICS Code: 33
Four Digit NAICS Code: 3314
Six Digit NAICS Canada Code: 331420
UTM Spatial Coordinates (NAD83)
for the facility: Latitude: 43.0233
Longitude: -81.1842
Datum: 1983

Company Contact Information

Name: Mary Cushing
Position: Human Resources Manager
Address: Same as Company Address
Telephone Number: 519-455-0770

Parent Company (PC) Information, if applicable

PC Legal Name: Copper Investments Holding Inc.
PC Address, if different from Company: 504-4100 Young Street
Toronto Ontario
M2P 2G2
Percentage Ownership for each PC: 100

Names of Toxics Substances for which plans have been prepared

Copper

Statement of Intent

GREAT LAKES COPPER, INC. is Canada's leading manufacturer of copper tube products for the industrial, wholesale and refrigeration markets. The company has been in operation for over 50 years and based in London, Ontario. The company is Canadian owned. Our products are manufactured to meet all ASTM and applicable specifications for our products. We work diligently to improve the effectiveness of the environment management program and conduct periodic assessments of our operations for the purpose of evaluating, tracking and improvements. We have eliminated the use of TCE cleaning products for our medical products.

Our raw product is only melted, we do not have any smelting operations. Therefore no refining of the product occurs at our facility.

Reduction Plan Objectives

It is our intent to operate within Regulations and operate as efficiently as possible. We have no substitutions for our product and we, like any other business wish the ability to produce our finished product to compete in the world markets.

Description of Substance

Pure copper is used to make copper tube products.

Toxic Substance Reduction Options to be Implemented (or, if none, rationale)

None will be implemented because copper is our product and no new reduction options have been identified that would improve our current environment management program.

Estimated Reductions for each Option (if any)

N/A

Timelines for Achieving Reductions (if any)

N/A

PLAN SUMMARY STATEMENT

This plan summary accurately reflects the content of the toxic substance reduction plan for **Copper**, prepared on behalf of Great Lakes Copper Inc., dated **December 20, 2012**.

CERTIFICATION BY HIGHEST RANKING EMPLOYEE

As of **December 20, 2012**, I, **Don Wellington**, 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.

Toxic Substance: Copper



Don Wellington
President
Great Lakes Copper Inc.

CERTIFICATION BY LICENSED PLANNER

As of **December 20, 2012**, I, **Ailee Ho** certify that I am familiar with the processes at Great Lakes Copper Inc. that use or create the toxic substance referred to below, that I agree with the estimates that are set out in the plan dated **December 20, 2012** and that the plan complies with the Act and Ontario Regulation 455/09 (General) made under that Act.

Toxic Substance: Copper



Ailee Ho
Environmental Practitioner
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