Summary of Public Comments Received on the Federal Environmental Quality Guidelines for Bisphenol A

Comments on the Federal Environmental Quality Guidelines (FEQG) for Bisphenol A (BPA) to be addressed as part of the Chemicals Management Plan (CMP) were submitted by the American Chemistry Council, and the British Columbia Ministry of Environment and Climate Change.

A summary of comments and responses is included below, organized by topic:

Topic	Summarized Comment	Summarized Response
Editorial Changes	On the X axis of Figure 1, it is suggested that "higher" be changed to "high".	No changes were made to Figure 1 because it implies a relatively higher number of potentially affected taxa, rather than a specific high number of affected taxa.
Methodology	Details regarding identification and classification of studies for inclusion or exclusion were requested.	Details regarding identification and classification of studies for inclusion or exclusion were added to the final FEQG. In particular, the methodology used when gathering toxicity data, and that Canadian Council of Ministers of the Environment (CCME) protocols for determining data acceptability were followed.
	Apply a maximum likelihood approach within the SSD method for guideline development in place of the non-linear least squares approach	The non-linear least squares approach within the SSD method will continue to be applied in the development of the FEQG for BPA. Where appropriate, other approaches may be explored when developing future guidelines.
	Species not found in Canada should be removed from the dataset.	Toxicity studies were conducted on a limited number of species. To strengthen the SSD dataset, additional species were used, including comparable foreign species that live in

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		similar habitats.
Information & Data Updates	Revise the current information on persistence based on the new references that were provided regarding degradation of bisphenol A (BPA) in sediment.	No updates were made to the current information because the new references did not provide enough content to support changes to the background information in the Federal Water Quality Guideline (FWQG).
	Update the current FWQG with new information that was provided. Also, add 10 studies (including three marine studies) and remove five studies from the dataset.	Upon scientific review, the 10 suggested studies were not included because they do not meet the criteria for developing this FEQG. Two of the five studies suggested for removal do meet the FEQG data acceptability criteria and were retained. Three studies were removed because they do not meet FEQG data acceptability criteria. As a result the final FEQG value is higher for water, sediment, and mammalian wildlife than that presented in the draft.
	Include the additional sediment toxicity data that were provided in order to derive a Federal Sediment Quality Guidelines (FSeQG) using CCME methods instead of calculating a value based on the FWQG.	The CCME Protocol for Derivation of Canadian Sediment Quality Guidelines for the Protection of Aquatic Life (CCME 1995) allows different calculation methods depending on data availability. The current method of FSeQG development uses a valid CCME method and was retained. The additional studies did not meet the data acceptability requirements of the Spiked Sediment Toxicity Test Approach of the CCME protocol and therefore there were insufficient chronic data available for guideline derivation following this approach.
	Update the Federal Wildlife Dietary Guideline (FWiDG) with new values from recent research.	Based on this new information, the endpoint for developing the FWiDG was changed to 5 mg/kg-bw/day. This value is supported by Environment & Climate Change Canada, Health Canada (2008) and by the United States Food and Drug Administration. This change resulted in a higher FWiDG for mammals than was presented in the draft.