**Summary of Public Comments received on the Challenge substance epichlorohydrin (CAS RN 106-89-8) Proposed Risk Management Approach document for Batch 2**

Comments on the proposed risk management approach document for **Epichlorohydrin** to be addressed as part of the Chemicals Management Plan Challenge were provided Dow Chemical Company and the STORM Coalition.

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



| TOPIC | COMMENT | RESPONSE |
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| **Exposure** | Occupational exposure is not adequately dealt with. Risk Management should include protecting workers from epichlorohydrin inhalation thought to cause lung damage. | Exposure of the general population to chemicals through environmental media (e.g., food, ambient air, soil, consumer products) is taken into account in developing both the screening assessment and risk management scope documents. Other factors, such as the impact on vulnerable populations, are also considered. Hazard information obtained from occupational settings, in particular data from epidemiological investigations, is considered in the risk assessment. The information developed through the CMP process may be used to inform decisions concerning additional actions to minimize exposure to workers. The Government of Canada is working to communicate results to appropriate occupational health and safety authorities. |
| | The matter of disposal of the many products containing epichlorohydrin has not been dealt with and needs to be addressed. | The Screening Assessment Report did not identify waste disposal as a source of exposure to epichlorohydrin and the risk management approach does not propose any risk management actions for waste disposal. |
| | Food contact applications should be a particular focus of the strategy, minimizing any exposure to the chemical. | Industry has indicated that only negligible amounts of epicholorohydrin would potentially be found in food and this is not considered to represent a safety concern. Future submissions of its use in epoxy linings will be |

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| | | scrutinized to keep residual levels in the finished packaging material as low as possible. |
| | Is there epichlorohydrin exposure in Canada? With the one exception of wet-strength resins there is no evidence offered that epichlorohydrin is in Canada. | It is likely that epichlorohydrin is being imported as residual monomer in products containing epoxy resin or other resins made using epichlorohydrin; however, these residuals would not meet the s. 71 survey reporting criteria as they are too low. |
| **Risk Management Instruments** | The Government of Canada should consider undertaking further analysis and/or monitoring to establish exposure and risk to assist in the development of an effective risk management instrument. | Identifying risk requires exposure and hazard data, both of which are considered in the risk assessment. Any new findings that are brought forward will be reviewed. |
| | Epichlorohydrin should be subject to the SNAc provisions of CEPA 1999 and the government should consult with stakeholders in constructing the SNAc instrument. | The application of the Significant New Activity provisions under CEPA 1999 to this substance will be recommended so that the future use notification objective can be met. This would require that any proposed new manufacture, import or use be subject to further assessment, and would determine if the new activity requires further risk management consideration. Stakeholders are engaged during the development process as well as during the proposal phase at the publication of the Notice of Intent to apply the SNAc provisions. |
| | If there is insufficient exposure, should epichlorohydrin be found toxic? | Epichlorohydrin was found to meet the criteria of s.64 of CEPA 1999 on the basis of carcinogencity, for which there may be a probability of harm at any level of exposure. |

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| | Adopted voluntary standards affecting drinking water should be made mandatory and be implemented either provincially or federally. | The NSF International standards are voluntary but can be referenced in legislation or regulation to make them enforceable. The Government of Canada does not currently mandate these standards. However, many provinces and territories have adopted legislation which makes these standards mandatory in their jurisdiction. |
| | Consideration must be given to phasing out the pervasive use of this substance and substitution by safer alternatives. | Where available and relevant to the Canadian context information on alternatives and the risks of the alternatives is considered during the risk management process. |
| | The risk management should focus on reducing the overall burden of human exposure to epichlorohydrin, not only by addressing the gaps in information, but also by implementing measures to minimize the use and release of this substance to the environment. | The risk assessment concluded that even conservative estimates of exposure were negligible; therefore, the risk management objective is to prevent any increases in exposure. |
| **Reporting and Monitoring** | The threshold for reporting releases of epichlorohydrin to the **National Pollutant Release Inventory** (NPRI) should be revised to require reporting any releases, that is, no threshold. | Substances declared to meet the criteria of section 64 of CEPA 1999 are given high priority in NPRI consultations. It should be noted that any party (person, government or organization) in Canada may submit a proposal to Environment Canada for changes to the NPRI program. Changes to the substance list result from the NPRI consultations process and may include the addition, modification or removal of substances as well as changes in the thresholds at which they must be reported. |
| | More information is needed on the actual levels in drinking water. | The provinces and territories are generally responsible for water safety including the monitoring of drinking water quality. |