

Summary of Public Comments received on the Challenge substance BPAOPB (7147-42-4) Draft Screening Assessment Report for Batch 6

Comments on the draft screening assessment report for BPAOPB to be addressed as part of the Chemicals Management Plan Challenge were provided by the Color Pigments Manufacturers Association, Inc.

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

- Uses
- Risk Assessment Conclusion

TOPIC	COMMENT	RESPONSE
Uses	The Annex 8 of the REACH regulations on certain azo dyes used in textiles do not apply to azo pigments. There is no evidence that BPAOPB is degraded and therefore, it would not be subject to the regulations if pigments were included.	In the absence of empirical data for BPAOPB, all analogues and potential degradation products are considered in this assessment. The assessment indicates that the available information demonstrates that azo cleavage does not occur or is extremely limited
Risk Assessment Conclusion	A similar analysis is recommended to be applied to the other medium priority azo pigments that were not covered by the Challenge.	The BPAOPB analysis may be used to inform future assessments of similar pigments.
	There is no justification for extensive data collection through surveys, nor further analysis for azo pigments.	This public comment is being considered together with similar public comments received on the Notice of Intent for the aromatic azo- and benzidine-based substances approach.