**Summary of Public Overarching Comments Received on the Proposed Risk Management Approach Documents for Batch 3**

Overarching comments on the Proposed Risk Management Approach documents for Batch 3 to be addressed as part of the Chemicals Management Plan Challenge were provided by the Dow Chemical Canada, Canadian Environmental Law Association, Chemical Sensitivities Manitoba, Radiator Specialty Company, Leaning Disabilities Association of Canada, Canadian Vehicle Manufacturers Association, Color Pigment Manufacturers Association and the International Institute of Concern for Public Health. The table contains a condensed version of each comment and a response in non-technical terms.

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



| TOPIC | COMMENT | RESPONSE |
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| **Stakeholder engagement** | The Government of Canada should consult with both manufacturers and importers when developing risk management instruments and should strive to ensure that no interested stakeholders are missed. | The Government of Canada works collaboratively with stakeholders such as the public, industry and health and environmental communities to ensure that the risks are clearly communicated and the regulatory decisions are understood.<br><br>The participation of stakeholders is helpful in assisting the Government to develop strong and effective risk management actions. |
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| TOPIC | COMMENT | RESPONSE |
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| **Alternatives** | Substances that are known to have health implications such as human carcinogenic potential, reproductive and developmental toxicity should be targeted for phase out. There is concern that the current risk-based approach emphasizes control measures instead of prohibition of substances subject to the *Canadian Environmental Protection Act, 1999*. Government should recommend precautionary measures that phase out and eventually eliminate harmful substances in Canada. | The Government of Canada considers a wide variety of risk management options including prohibiting or phasing-out a substance. However, when phase out or prohibition is not possible, and exposure risks are low, the Government of Canada develops regulations to control sources and limit releases of substances in order to protect the environment and human health. |
| | The Government of Canada should develop an alternatives assessment process that engages all levels of government, industry (suppliers and users), and other stakeholders when assessing the economic, social, health and environmental implications of replacement or alternative technologies and substances. The resulting information should be made available to the general public and industry. | Where available and relevant, information on the availability and cost of alternatives for a substance used in Canada , including the economic, social, health and environmental implications, will be considered in the development of risk management tools. Information on these impacts may be generated from a number of sources, including direct engagement with stakeholders. When a regulation is developed, the full analysis will be made available in the Regulatory Impact Assessment Statement. The Government of Canada is exploring a risk assessment approach for some groups of chemicals which could lead to the concurrent assessment of potential alternatives. |

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| **Risk management instruments** | The lack of details on the risk management measures for the four chemicals that meet section 64 of CEPA 1999 is unacceptable considering the Government's findings of their carcinogenicity and reproductive toxicity. | The Proposed Risk Management Approach documents provide initial direction on the proposed risk management measures. It is the intention of the Government of Canada to provide as much detail as possible on the proposed risk management measures as early as possible in the risk management process. However, providing significant detail at these earlier stages is not always possible due to limited availability of some information at this stage. More detailed information can be collected and analyzed in the instrument development stage (approximately 42 months) which can be used to further inform risk management decisions. |
| **Risk management of persistent substances** | When the Draft Screening Assessment results show that pigments and dyes are persistent, the Government should take measures to reduce the use of these chemicals over time as they are likely to find their way into waste streams and sewer water. | When pigments and dyes are bound within plastic, dry paint, dry ink or coating resins, there may be negligible exposure and risk. The Government of Canada may use the Significant New Activity provisions of CEPA 1999 to risk assess and risk manage pigments and dyes. 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. |
| **Uncertainty in instrument development** | Control instruments may be difficult to develop or ineffective if the approaches or values used in the development of the conclusions of the assessment are uncertain, as there may or may not be a risk. Uncertainties may be the result of inappropriate exposure | The Government of Canada recognises that uncertainty exists in the confidence of the exposure calculations depending on the strength of the data used in the modelling. This uncertainty is partially addressed by applying precaution. Where there is minimal or weak data, conservative assumptions are identified in the Screening |

| TOPIC | COMMENT | RESPONSE |
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| | scenarios and modeled data. | Assessment Report to safeguard human health. Further, in the 42 months of development of risk management instruments, information is verified and refined in order to align risk management efforts. |
| **Socio-economic considerations** | The development of a risk management instrument should include a rigorous qualitative and quantitative analysis of socio-economic factors. The Government should also understand all aspects of a regulatory approach, including a technology's viability, before promoting, incorporating or regulating its decision. | Qualitative and quantitative socio-economic, technical and environmental factors are considered where applicable, in the instrument development process. However, a quantitative analysis of all factors is not always possible due to the limited availability of information. The Government of Canada works with stakeholders, such as the public, industry, and non-governmental organizations in the development of a risk management instrument. |
| **Communication and outreach** | The Government should enhance communication and outreach with the public as well as authorities in occupational health, unions, etc. on the outcomes for the assessment and management of the substances in the Challenge Program. | The development of any risk management measure involves a multi-stakeholder consultation process that includes, for example, occupational health groups. Various opportunities to consult in the Challenge include: public comment periods following the publication of the draft Screening Assessment Report and Risk Management Scope document, Proposed Risk Management Approach document and proposed instrument; meetings (if necessary); and additional communication and interaction during instrument development. |
| | The process for identifying stakeholders should be examined to ensure comprehensive representation of stakeholders engaged in the review process. | During risk management instrument development all stakeholders are encouraged to comment on proposed instruments. Those who express an interest are invited to comment and participate during the instrument development process. |
| **Data uncertainties** | Updated market information provided by stakeholders during the risk management stage should be acted upon. | All information received is reviewed and considered in the risk management process, especially during instrument development. |

| TOPIC | COMMENT | RESPONSE |
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| **Vulnerable populations** | The risk management proposals should recognize and take action to protect vulnerable populations. | Risk assessments are science-based assessments of the available data. Various exposure scenarios are used that are protective of vulnerable populations in Canada. When risk assessments identify a risk to a particular population, actions to protect that population are included in the risk management. |