

Summary of Public Comments Received on the Government of Canada's Draft Screening Assessment Report on Pigment Orange 2 (CAS No. 6410-09-9)

Formal comments made during the 60-day public comment period that took place from August 23, 2008 to October 22, 2008 on the draft screening assessment report on Pigment Orange 2, a substance included in Batch 3 of substances to be addressed as part of the Chemicals Management Plan Challenge were provided by Reach for Unbleached Foundation and the Crooked Creek Conservancy Society of Athabasca.

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

- Releases to the Environment
- Persistence, Bioaccumulation and inherent Toxicity

TOPIC	COMMENT	RESPONSE
Releases to the Environment	There is a lack of information on the amount of Pigment Orange 2 imported into Canada and any potential releases from such products. There is a lack of environmental monitoring concentrations in Canada for Pigment Orange 2.	Pigment Orange 2 was not reported to be imported or manufactured in Canada in quantities above the threshold level of 100 kg per year or used in quantities above the threshold of 1000 kg per year. Therefore, any use in Canada can be described as low. The assessment is based on available information using the current state of the science and the resulting modelled environmental concentrations were estimated conservatively – to ensure that potential for exposure is not underestimated. There is a possibility that this substance may be included in future monitoring programs.
Persistence, Bioaccumulation and inherent Toxicity	The persistence and bioaccumulation assessment is limited by the lack of data.	The assessment is based on available information using the current state of the science. When used in bioaccumulation models, this predicts a low bioaccumulation/bioconcentration potential. Therefore, based on available information, Pigment Orange 2 is not bioaccumulative. Pigment Orange 2 is relatively inert and has a low potential for biodegradation. In general, pigments are designed to be persistent.