

Summary of Public Comments received on the Challenge substance butanone oxime (CAS RN 96-29-7) Proposed Risk Management Approach document for Batch 7

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

- Vulnerable populations
- Exposure
- Risk management
- Data gaps

TOPIC	COMMENT	RESPONSE
Vulnerable populations	How is the Government addressing the risk to vulnerable populations, including children, workers, etc., who are potentially exposed through the use and manufacture of products containing butanone oxime?	The screening assessments are based on consideration of the available data. The conservative exposure scenarios used for butanone oxime are considered to be protective of vulnerable populations in Canada, and do incorporate specific exposure estimates for Canadians of different ages. If information were available suggesting a specific sub-population would be vulnerable, that information would be considered in the assessment. Hazard information obtained from occupational settings, in particular data from epidemiological investigations, is considered in the assessments. The information developed through the Chemicals Management Plan 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 groups.
	Has the Government considered the ensuing impacts of long-range transport on receiving communities, particularly northern communities?	Butanone oxime is only moderately persistent in air, and has low potential of bioaccumulation. Given the moderate long-range transport potential, ecological or health concerns related to long-range transport are not expected.

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Exposure	Address the impact of the disposal of products containing butanone oxime and potential releases from disposal methods, whether through incineration, leaching or in other waste streams.	The Government's proposed risk management activities focus on minimization of the risks identified in the risk assessment based on the information available. If an identified risk cannot be discounted, a precautionary approach is taken to protect the health and environment of Canadians. In this case, exposure through release to the environment from the waste sector has not been identified and is not expected.
	The potential for contamination of food through food packaging materials containing butanone oxime.	Available information on concentrations in consumer products was reported in the assessment. Butanone oxime is found in some printing inks used in the manufacture of food packaging materials but it does not have direct contact with food. Therefore, exposure via food is not expected.
Risk management	Reporting and monitoring environmental releases through an appropriate public reporting system (e.g., NPRI) at an appropriate threshold.	The Government of Canada will consider proposing the addition of substances that meet the criteria under section 64 of CEPA 1999 to the NPRI's substances list. 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.

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Data gaps	There is an inherent lack of transparency in information on amounts of butanone oxime imported and used, and released to the environment. For example, releases and disposal of butanone oxime (e.g., that through facility disposal and product disposal) should be examined and subject to further research since there is no data available on it. That no significant releases were reported, aside from industry data, is of concern given its persistence in air and toxicity to humans.	Although concentrations were not identified for environmental media, information on uses and sources, and physical-chemical properties of the substance indicate that exposure of the general population from environmental media is likely to be low.
	Efforts should be made to seek potential substitution with safer alternatives.	No information on alternative technologies was submitted and no alternatives have currently been identified. Further consultations are being undertaken with industry.