

Summary of Public Comments Received on the Government of Canada’s Draft Screening Assessment Report and the Risk Management Scope Document on Pigment Red 3 (CAS No. 2425-85-6)

Comments on the draft screening assessment report and risk management scope document on Pigment Red 3, a substance included in Batch 3 of substances to be addressed as part of the Chemicals Management Plan Challenge were provided by Toxic Free Canada, Color Pigments Manufacturers Association, Chemical Sensitivities Manitoba, and Canadian Environmental Law Association.

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

- Releases to the Environment
- Carcinogenicity & Exposure
- Risk Management

TOPIC	COMMENT	RESPONSE
Releases to the Environment	<p>There is a need for environmental monitoring to determine the extent of the environmental releases of Pigment Red 3, given that data on releases are based on estimates only and current product usage data may not be accurate.</p> <p>The risk management scope document should include a recommendation to add Pigment Red 3 to the Ingredient Disclosure List of the <i>Hazardous Products Act</i>.</p>	There is a possibility that this substance may be included in future monitoring programs and the Government of Canada will consider placing Pigment Red 3 on the Ingredient Disclosure List of the <i>Hazardous Products Act</i> . Use in Canada is low.
Carcinogenicity & Exposure	Concerns were expressed that the tumours occurred at the highest doses in animal studies and that the data did not support the conclusion that CI Pigment Red 3 poses a hazard at any level of exposure.	The critical effect for Pigment Red 3 is carcinogenicity. Pigment Red 3 caused tumours at multiple sites in animal studies and it can’t be precluded that it will not cause cancer at any level of exposure. Therefore it is assumed to be a non-threshold carcinogen.
Risk Management	We support the listing of Pigment Red 3 on the Cosmetic Ingredients Hotlist as a substance that should be prohibited. However, management options under consideration are not sufficient or protective by “providing health and safety information and education materials for consumers regarding paint and coatings products”. This places the burden on consumers and the general public to protect themselves from toxic substances.	The assessment is based on available information using the current state of the science. Based on this information the Government has found that Pigment Red 3 meets the criteria of section 64e of CEPA, 1999. The Government of Canada considers the risk management options reasonable in light of uncertainties in the toxicity data and the minimal predicted consumer product exposure estimates.