

## Summary of Public Comments Received on the Government of Canada's Draft Screening Assessment Report on PBMBDP (CAS No. 25155-25-3)

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 PBMBDP, a substance included in Batch 3 of substances to be addressed as part of the Chemicals Management Plan Challenge were provided by The Society of the Plastics Industry Inc and Reach for Unbleached Foundation.

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	The amount of PBMBDP estimated to be transferred to waste disposal sites is much too high.	The assessment is based on available information using the current state of the science and the resulting modelled environmental concentrations were estimated conservatively so that potential for exposure is not underestimated.
Persistence, Bioaccumulation and inherent Toxicity	Available data indicates that the substance is not persistent or bioaccumulative in the environment.	The assessment is based on available information using the current state of the science. The weight of evidence indicates that the substance is not likely persistent or bioaccumulative.
	The assessment report does not present convincing evidence that the substance does not meet the definition of "toxic" in CEPA. There is uncertainty about the substance's presence in environment.	<p>The assessment is based on available information using the current state of the science and the weight of evidence suggests that it is unlikely to meet the criteria for persistence set out in the Persistence and Bioaccumulation Regulations.</p> <p>The assessment used conservative estimates of exposure to account for uncertainty. The Predicted Environmental Concentration resulted in a risk quotient less than one, indicating that the substance is unlikely to harm the environment.</p>