

Summary of Public Overarching Comments Received on the Proposed Risk Management Approach Documents for the Batch 5 Substances

Overarching comments on the proposed risk management approaches for Batch 5 to be addressed as part of the Chemicals Management Plan Challenge were provided by the Canadian Environmental Law Association, Chemical Sensitivities Manitoba, Canadian Vehicle Manufacturers' Association (CVMA), Dow Chemical Canada ULC, North American Polyelectrolyte Producers Association, and Inuit Tapiriit Kanatami. 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:

- [Risk management](#)
- [Vulnerable populations](#)
- [Stakeholder engagement](#)
- [Socioeconomics](#)

TOPIC	COMMENT	RESPONSE
Risk management	Risk management actions should address the source(s) of risk which led to the conclusion that the substance met the criteria of section 64 of CEPA 1999.	The focus of the risk management is on the primary source(s) of risk identified in the final screening assessment report.
	Risk management actions should be developed using the principles of sustainable development.	Sustainable development is one of the guiding principles of CEPA 1999 and is considered during the selection and development of risk management instruments for all substances which meet the criteria of section 64 of CEPA 1999. The Government of Canada also recognizes that environmental or health risks and social, economic and technical matters are to be considered in the process of

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		making decisions relating to the protection of the environment and human health.
	Information on a substance's use in products should be used when making risk management decisions.	Where relevant, a substance's use in products is used when making risk management decisions.
	The precautionary principle, pollution prevention, and consideration of vulnerable populations should be essential components of the proposed risk management approaches.	The precautionary principle and pollution prevention as defined in the Act are guiding principles of CEPA 1999. Consideration of these principles, as well as the impact of a substance on vulnerable populations, are made during the selection and development of risk management instruments for all substances that meet one or more of the criteria of section 64 of CEPA 1999.
Vulnerable populations	There is concern about the harm these substances may cause Inuit people and their environment. Particular concerns include the inclusion of these substances in products and processes that may be used by the Inuit, the potential for long-range transport of these substances to the Arctic, waste disposal of these substances, release of these chemicals through resource extraction activities, and ingestion of food containing these chemicals.	The Challenge screening assessment reports are based on considerations of the available data. The various conservative exposure scenarios used are considered to be protective of vulnerable populations in Canada. However, if information is available which suggests that a specific sub-population would be particularly vulnerable, this information would be considered in the assessment.
	The Government of Canada should clearly describe how the issues raised in this submission and other submissions are being addressed, so that the proposed risk	Responses to the public comments received following the publication of the draft screening assessment reports and risk management scope documents, as well as the publication of the proposed risk management approach documents for each

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	management approaches can be more meaningful to vulnerable populations, northern communities in general, and Inuit in Canada.	batch, are published after the public comment period and are available at: http://www.chemicalsubstanceschimiques.gc.ca/index-eng.php .
Stakeholder engagement	Exposure of the public to a substance needs to be communicated more effectively.	The risks of exposure to the public from a chemical substance assessed under the Challenge are detailed in the screening assessment report. Measures that the Government of Canada will take to protect public health are proposed in the proposed risk management approach document. Actions that the public can take to protect themselves, if necessary, are summarized in plain language in a Public Summary for the substance that is available on the Government of Canada's Chemical Substances website.
	The Government of Canada should consider two other stakeholder groups: importers and flame retardant manufacturers.	<p>The Government of Canada works collaboratively with stakeholders, such as the public, industry and health and environmental communities, to ensure that risks are clearly communicated and regulatory decisions are understood.</p> <p>The participation of stakeholders is helpful in assisting the Government of Canada to develop strong and effective risk management actions.</p>
	<p>The Government of Canada should outline details on its efforts to communicate and work with the provinces, affected industries and unions in its management strategy.</p> <p>It is also imperative that this process includes</p>	Exposure of the general population to chemicals through environmental media (e.g., food, ambient air, soil, consumer products) is taken into account for both the screening assessment report and risk management documents. Hazard information obtained from occupational settings, in particular

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	<p>participation by other stakeholders including, labour, environmental, and health organizations, etc.</p>	<p>epidemiological information, is considered in the risk assessment. The information developed through the Chemicals Management Plan process is communicated openly to all stakeholders, with multiple opportunities for comment and input, throughout the process, including the draft screening assessment and risk management scope stage, the proposed risk management strategy stage, and consultation on the risk management actions. Note, however, that the risk assessment and risk management activities under the Chemicals Management Plan relate only to exposures in the general environment and not to occupational settings.</p> <p>The Government of Canada looks forward to continuing to work with all interested stakeholders.</p>
	<p>The time periods between the public comment periods for each of the batches released under the Challenge are too short, as a result, comments on the batch 5 final screening assessment results for the remaining non-toxic substances in batch 5 were not able to be provided.</p>	<p>It is recognized that the accelerated risk assessment and risk management processes under the Challenge may be demanding for stakeholders; however, given the Government of Canada's commitment to implement the Chemicals Management Plan in a timely manner, there is a need to balance the timing of public comments with the need for action.</p>
Socioeconomics	<p>It is questioned how socioeconomic factors were considered because of the lack of a definitive instrument, lack of data, and no consultation to dialogue and collect detailed data and information.</p>	<p>Socioeconomic factors are considered qualitatively and quantitatively, where possible, in the regulation and instrument selection process. However, a quantitative analysis of all factors is not always possible due to the limited availability of information. The proposed risk management actions outlined in the risk management approach document were selected using a consistent approach and took into consideration available information on alternative chemicals</p>

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		<p>and substitutes, as well as other information received through the Challenge and other information available at the time.</p> <p>The proposed risk management approach documents provide early thinking on the proposed instrument. The next component of the process includes consultations on a proposed regulation or instrument for managing a substance. Socio-economic considerations are taken into account when developing proposed regulations. These considerations are summarized in the Regulatory Impact Analysis Statement (RIAS), which is published in the <i>Canada Gazette</i> at the same time as the proposed regulations. The RIAS identifies alternative risk management measures that were considered and provides an explanation of why the chosen instrument was selected over the available alternatives. To the extent possible, the RIAS also includes a quantitative assessment of socio-economic costs and benefits of the proposed instrument. Additional information on socioeconomic factors that has been gathered since the publication of the proposed risk management approach document is also considered in the development of the RIAS.</p>