

Summary of Public Comments received on the Draft Screening Assessment and Risk Management Scope for Phenol , 2-(2H-benzotriazol-2-yl)-4,6-bis(1,1-dimethylpropyl) – (BDTP, CAS RN 25973-55-1)

Comments on the draft screening assessment and the risk management scope for BDTP to be addressed as part of the Government of Canada's Chemicals Management Plan were submitted by Assembly of First Nation, PPG Canada Inc., Canadian Paint and Coatings Association, Canadian Vehicle Manufacturers' Association, and Global Automakers of Canada.

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

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Submission	Summarized / Rolled-up Comment	Summarized/Rolled- up answer
Overarching Comments	There is support for the proposed conclusion in the draft screening assessment.	Recent information was obtained suggesting lower releases of BDTP from manufacturing processes. Based on this new information, site-specific exposure scenarios were revised and it was determined that releases from the manufacturing of plastics and coatings are not expected to pose a risk to aquatic and terrestrial organisms. The screening assessment now concludes that BDTP does not meet any criteria under section 64 of CEPA.
	It is agreed that further study of actual releases and environmental monitoring is warranted.	New environmental monitoring data on BDTP in Canada were obtained from a recent CMP wastewater monitoring project and incorporated into the screening assessment. Measured concentrations of BDTP were very low and below thresholds for risk. A research project on BDTP and a few other phenolic benzotriazole UV stabilizers is proposed for 2014-2015 as part of the CMP monitoring and surveillance

		program.
Uses	Additional information about uses of BDTP in Canada was provided. The substance is imported as a constituent within automotive components such as plastics, rubber, paints, coatings and adhesives.	The screening assessment notes that BDTP may be imported into Canada in finished articles and products. Total quantities of BDTP in these products are unknown and are not included in the total import quantities considered in the assessment. It is noted in the screening assessment that release of BDTP from articles and products is not expected; therefore quantities of this substance in products are not considered as a source of exposure.
Exposure	End-of-life or recycling of products containing BDTP was not considered in the screening assessment. Vehicles may not be properly recycled in remote areas because transportation costs are prohibitive. As a result, assumptions made in the draft Screening Assessment are not relevant to remote First Nations communities.	The screening assessment notes that BDTP is not expected to leach out of articles and products, including parts of end-of-life vehicles that may contain this substance. Therefore impacts to remote communities are not anticipated.
	A survey of industry association members concluded that wastewater is not generated during normal paint manufacturing processes. However, the draft screening assessment indicates that BDTP is released to wastewater from paint formulators.	New data from the CMP monitoring and surveillance program shows that BDTP was detected at very low levels in influents to wastewater treatment systems. These new monitoring data were incorporated into the final screening assessment. Based on the outcomes from risk characterization, releases from manufacturing of plastics and coating products are not expected to pose a risk to aquatic and terrestrial organisms.

Inherent Toxicity and Human Health effects	As knowledge of effects on human health seems to be limited, further research and reassessment of BDTP may be warranted.	Screening assessments are based on consideration of available data and information. Data limitations and uncertainties were noted in the assessment. The assessed substance remains subject to additional activity, as warranted, if new information becomes available.
Risk Assessment Conclusion	The data from 2000 is outdated and does not represent how industry currently operates. If a section 71 notice was conducted today the results would be different. In addition, there is no monitoring data to support assumptions made in the Screening Assessment.	It is noted that the data from 2000 is outdated. Updated information on uses and sources of BDTP in Canada were obtained via a stakeholder consultation in 2011-2012 and voluntary surveys in 2014. The screening assessment has been updated with new information on current use quantities. New monitoring data for BDTP in Canada that supports the ecological exposure assessment on releases of this substance were also incorporated in the final assessment.
	It should be clarified that releases from products are not expected and that therefore no risk management is required for users of BDTP.	It is noted in the screening assessment that releases of BDTP from products are not expected. Furthermore, as BDTP does not meet any criteria as set out in section 64 of CEPA, no risk management action is proposed for this substance.
Consultations	Stakeholders are concerned because a sector that is a main user of BDTP was not consulted.	Following the public comment period, stakeholders in the sectors involved were asked to provide additional information to ensure a more thorough assessment of the risks linked to their activities in relation to this substance. New information submitted was considered in the final screening assessment.
Proposed Risk Management	More investigation and study of alternatives are required and names of alternatives should be provided to industry.	<p>The screening assessment concludes that BDTP does not meet criteria as set out in section 64 of CEPA. This assessment has considered all available information including further investigations of the potential sources of release and the quantity released.</p> <p>There are currently no proposed risk management actions for BDTP (in line with other jurisdictions).</p> <p>BDTP and a few other phenolic benzotriazole UV stabilizers are part of a research project under the CMP monitoring and surveillance program.</p>
	Requires additional investigation of emissions; toxicological outcomes and other research to close the data gaps regarding risks of exposure.	
	Virtual elimination of BDTP would seriously impact the ability of some major sectors to import components required for their activities and could disrupt several key markets in the Canadian economy.	

	<p>Regulations should be compatible with those of other jurisdictions to be more in line or in step with the global regulatory community.</p> <p>There should be more focus on improving environmental management practices rather than considering reformulation and substitution.</p>	<p>Results from this program will be considered in future assessments of phenolic benzotriazole UV stabilizers.</p> <p>Furthermore, since there may be concerns if import and use quantities were to increase in Canada, the substance will be added to the Domestic Substances List Inventory Update to monitor changes in Canadian import, use and release.</p>
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