

**Summary of Public Comments received on the Challenge substance naphthalene (CAS RN 91-20-3) Proposed Risk Management Approach document for Batch 1**

Comments on the proposed risk management approach for naphthalene to be addressed as part of the Chemicals Management Plan Challenge were provided by Dow Chemical Canada, Recochem Inc., and the Naphthalene Council, Inc.

Comment	Response
The proposed risk management approach document does not propose specific actions, regulations or instruments which could prompt early stakeholder feedback.	The proposed Risk Management Approach for Naphthalene identified a variety of actions designed to address this substance. We intend to notify interested stakeholders of consultation opportunities that may arise when authorities other than the <i>Canadian Environmental Protection Act, 1999</i> (CEPA 1999) are used for risk management.
The risk management objective in the proposed risk management approach document should highlight reduction of exposure to naphthalene in indoor air.	The Government of Canada has stated that minimization of potential contribution to indoor air is the focus of risk management. Studies are underway to identify the sources of naphthalene in indoor air to facilitate appropriate risk management. In addition, exposure through other routes and sources will also be subject to potential management action.
Since naphthalene is already subject to various federal regulations, why is there is a need for additional regulation under CEPA 1999?	Based on the science in the risk assessment, the Government of Canada will select the most appropriate tool for risk management of this substance. Consideration was given to additional management under other federal legislation as well as under CEPA 1999. On the basis of the carcinogenicity of naphthalene, for which there may be a probability of harm at any level of exposure, as well as the potential inadequacy of the margin between the upper-bounding concentration of naphthalene in indoor air and the critical effect level for non-cancer effects, additional risk management was deemed appropriate.
The proposed risk management approach document appears to propose an indoor air quality study for naphthalene.	The proposed risk management approach proposes to undertake a characterization or determination of controllable sources of naphthalene in indoor air, i.e., source

	attribution. In addition, studies are underway to identify the sources of naphthalene in indoor air to facilitate appropriate risk management.
The proposed risk management approach associates the quantity of mothballs sold in Canada with the quantity of naphthalene in commerce in Canada.	The total volumes of naphthalene manufactured and imported in Canada apply to a large number of Canadian companies which have reported using naphthalene in a wide variety of product applications, which would include, but not be restricted to, manufacture of mothballs. Furthermore, care has been taken to emphasize that there are various possible sources which could contribute to indoor air levels of naphthalene.