

Summary of Public Comments Received on the Challenge substance CHPD (CAS RN 54079-53-7) Proposed Risk Management Approach document for Batch 1

Important Notice (READ THIS FIRST!)

The proposed risk management approach document for CHPD reflects past risk assessment decisions on this substance that are no longer applicable. The revised draft screening assessment published on July 3, 2010 proposes that CHPD does not meet any of the criteria set out in section 64 of the *Canadian Environmental Protection Act, 1999 (CEPA 1999)*. As a result, the proposed risk management approach document for CHPD is no longer applicable and regulations or instruments respecting preventive or control actions are not being considered for CHPD at this time. For additional information please visit: <http://www.chemicalsubstanceschimiques.gc.ca/challenge-defi/batch-lot-1/index-eng.php>.

As part of the Chemicals Management Plan Challenge, stakeholders were invited to provide comments on the proposed risk management approach document for CHPD, a substance included in Batch 1 of the Challenge. Formal comments made during the 60-day public comment period that took place from July 5, 2008 to September 3, 2008 were provided by Lanxess Corporation and Sony of Canada Ltd. Please note that responses to these comments have not been provided because the proposed risk management approach is no longer applicable.

COMMENTS

The release of CHPD through plastics manufacturing is not an exposure pathway of concern, given the lack of empirical data. The Government of Canada should not target releases if they are not sure a risk exists.

It is very unlikely that CHPD will be found or detected in landfill leachate because of its chemical properties and the quantities used.

Specific uses of CHPD, which lack suitable substitutes and do not result in releases to the environment, should be exempt from risk management activities.

CHPD contained in manufactured articles should not be targeted for virtual elimination because the proposed risk management approach document states that, "releases during the use of manufactured articles containing CHPD are expected to be extremely low."