

Summary of Public Comments Received on the Government of Canada's Draft Screening Assessment Report on Acid Violet 48 (CAS No. 72243-90-4)

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 Acid Violet 48, a substance included in Batch 3 of substances to be addressed as part of the Chemicals Management Plan Challenge were provided by 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	There is a lack of information on the amount of Acid Violet 48 imported into Canada and any potential releases from such products. There is a lack of environmental monitoring concentrations in Canada for Acid Violet 48.	The assessment is based on available information using the current state of the science and the resulting modelled environmental concentrations were estimated conservatively – to ensure that potential for exposure is not underestimated. There is a possibility that this substance may be included in future monitoring programs.
Persistence, Bioaccumulation and inherent Toxicity	The risk to soil and sediment organisms is not addressed.	No soil or sediment toxicity data were available, acute toxicity values were generally low and the medium of most concern based upon the exposure scenario was water. Considering the current release scenarios, the quantities used in Canada and the low aquatic toxicities, it is expected that Acid Violet 48 poses little risk to soil or sediment dwelling organisms in Canada.
	The conclusions that Acid Violet 48 is not harmful under CEPA 1999 is inappropriate considering the lack of information available.	The assessment is based on available information using the current state of the science and the resulting modelled environmental concentrations were estimated conservatively – to ensure that potential for exposure is not underestimated