

Summary of Public Comments received on the Challenge substance 2-nitrotoluene (B8- 88-72-2) Proposed Risk Management Approach document for Batch 8

Comments were provided on the proposed risk management approach document for 2- nitrotoluene to be addressed as part of the Chemicals Management Plan Challenge. 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:

- Data Gaps
- Risk Management Approach

| TOPIC | COMMENT | RESPONSE |
|-----------|---|--|
| Data Gaps | Products imported into Canada containing 2-nitrotoluene in trace amounts may be a source of release to the environment. However, there is no information or public knowledge of quantities being released to a specific media or method of disposal (e.g., water, wastewater, incineration, or landfill). | The quantities of 2-nitrotoluene imported into Canada are low. This substance is not manufactured in Canada, and the use is expected to be limited to industrial applications. Exposure to Canadians and to the environment from consumer products is not expected. A conservative modeling scenario indicated very low concentrations would be released to water, the media of concern. |
| | Given the persistence of 2-nitrotoluene in all media, and the large quantities that have been used, it cannot be assumed that the substance is not present in water, or soil, and sediment. The screening assessment does not consider that the historic uses of large quantities of 2-nitrotoluene in many industries and products could result in large disposal levels and stockpiles. | All available information is considered in the risk assessments. There was no data identified concerning concentrations of 2-nitrotoluene in environmental media. Although large quantities of this substance were used historically, 2-nitrotoluene was not detected in the Canadian environment and conservative release scenarios indicate that environmental exposure is expected to be low. |
| | There is no empirical evidence, including monitoring or long-term studies, to substantiate | The assessment, including the use of conservative exposure scenarios, suggests a low potential for Arctic contamination. This substance is expected to exist as vapour in the atmosphere and |

| TOPIC | COMMENT | RESPONSE |
|--------------------------|--|---|
| | <p>that the deposition of 2-nitrotoluene to the earth's surface is unlikely in a remote region. Given the historic uses of 2-nitrotoluene and its persistence, over a long term, deposition may be a factor in the North. It is recommended precaution be exercised in reliance on predictions from models, especially where there is no data.</p> | <p>would be degraded by reaction with hydroxyl radicals and direct photolysis.</p> |
| Risk Management Approach | <p>The government needs to consider banning and/or limiting the use and import of 2-nitrotoluene under the <i>Prohibition of Certain Toxic Substances Regulations</i>, as its risk management strategy.</p> | <p>When a substance is found to meet the criteria under Section 64, <i>Canadian Environmental Protection Act, 1999</i> (to pose a potential risk to human health), risk managers consider a wide variety of risk management options in order to address the risk. The risk management option is selected in accordance with the Government of Canada's Cabinet Directive on Streamlining Regulation, as well as, information available at the time of the screening assessment.</p> <p>In this case, while 2-nitrotoluene is considered harmful to human health, the general population's exposure is expected to be low based on current use in Canada. A Significant New Activity provision (SNAC) will be implemented that will require any new use, manufacturing or importation of 2-nitrotoluene to be notified to the government for risk assessment, thereby allowing additional risk management measures to be put in place, if necessary.</p> |