

Summary of Public Comments Received On the Challenge Substance PREPOD (CAS: 68412-48-6) Draft Screening Assessment Report and Risk Management Scope Documents For Batch 11

Comments on the proposed Draft Screening Assessment Report and Risk Management Scope Documents for PREPOD to be addressed as part of the Chemicals Management Plan Challenge were provided by Canadian Environmental Law Society; and Chemical Sensitivities Manitoba, and Canadian Vehicle Manufacturers Association.

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

- Risk Management Scope
- Uses
- Other Comments

| Subject | Comment | Response |
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| Risk Management Scope | Regulations for eliminating use of PREPOD over time would be more protective of the environment than the quantification levels that industry applies in control processes. | Substances added to Schedule 1 of CEPA 1999 that also meet the criteria for persistence and bioaccumulation are subject to virtual elimination. The intent of this environmental objective is to achieve the lowest level of releases to the environment that is technically and economically feasible. |
| | In addition to finding more information on the use and extent of contamination, the government should take precautionary measures when additional information is not available. | The proposed RM Approach for PREPOD outlines a number of actions to address the current risks associated with PREPOD and to fill the information gaps associated with the substance. This will allow some time to better define potential sources of releases and to manage them in an appropriate and efficient manner. |
| | There are concerns about the potential impact of eliminating PREPOD and that technical and feasibility considerations must be taken into account. Identification of alternative chemicals and substitutes for PREPOD is challenging. Safe alternatives to PREPOD should be identified and promoted as part of this process. | Consultation with stakeholders is an essential part of the risk management process. The Government of Canada intends to consult extensively with all affected stakeholders when developing risk management measures. Substitutes for PREPOD will be considered, where possible, during the risk management process. |
| Uses | Du fait que la substance est utilisée dans le caoutchouc et dans l'industrie automobile, il est peu probable que PREPOD se retrouve dans les sites d'enfouissement. Les voitures se retrouvent normalement dans les fours métallurgiques pour le recyclage de l'acier. Le caoutchouc se retrouve en général dans les fours à ciment ou sont recyclés. | The exposure scenario, specifically the Mass Flow Tool (MFT), has been revised in the final SAR but there is still uncertainty about the relative quantities of PREPOD that are recycled and sent to landfills. Additional information to be collected during the risk management phase will help quantify the amounts of PREPOD being recycled and landfilled. |

| Subject | Comment | Response |
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| Other Comments | La nomenclature est différente en anglais et en français. Par ailleurs, le nom français comporte une erreur car la "dianiline" n'existe pas comme substance. | The French translation will be corrected in the final SAR. |