

Summary of Overarching Public Comments received on site-restricted Petroleum and Refinery Gases Draft Screening Assessment Report for the Petroleum Sector Stream Approach Stream 1

Comments on the draft screening assessment of Petroleum Sector Stream Approach (PSSA) site-restricted Petroleum and Refinery Gases (PRGs) to be addressed as part of the Chemicals Management Plan were provided by Keepers of the Athabasca, International Institute of Concern for Public Health (IICPH), and Canadian Petroleum Products Institute (CPPI).

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

- Persistence and Bioaccumulation
- Sources
- Releases
- Exposure
- SNAc Provisions

TOPIC	COMMENT	RESPONSE
Persistence and Bioaccumulation	The uncertainties surrounding the utilization of representative structures for modeling the persistence and bioaccumulation of site-restricted PRGs are concerning.	Data on the composition of these mixtures were not available, and are, by their nature, variable. The use of analogues and representative structures is a recognized approach when conducting risk assessments. The use of representative structures allowed estimation of toxicity, persistence and bioaccumulation potentials. Uncertainties associated with this procedure are acknowledged in the assessment.
Sources	The amounts of site-restricted PRGs used and produced are not provided in the assessments.	Information on the manufacture, import, and use of site-restricted PRGs, as well as the number and location of facilities producing these substances was gathered from voluntary industry submissions, literature review, Material Safety Data Sheets (MSDS), and a mandatory survey under section 71 of CEPA 1999. All available information, including the data submitted under the confidence agreement of the

		<p>section 71 survey, was used to inform the screening assessment of site-restricted PRGs.</p> <p>The submitted data demonstrated that the substances considered in this assessment are not transported off of the facilities as they are intermediate processing streams. Process flow diagrams were also used to determine if a substance was site-restricted. Since these substances are not transported off the facility sites, the volumes produced and consumed within the facilities are not relevant to the screening assessments. The finished products of these processing intermediates are scheduled to be assessed under future PSSA assessments.</p> <p>Consistent with the terms of confidential business information, data considered relevant to the assessment were provided in the assessment report in the most transparent manner possible. Subject to applicable laws, the Government of Canada continually works with stakeholders to ensure a balance between protection of proprietary information and presenting information in the most transparent manner possible in the interest of public health, public safety and for the protection of the environment.</p>
Releases	The term 'minimal' requires explanation.	Use of this term has been clarified in the screening assessment.
Exposure	The assessments of the site-restricted PRGs should consider occupational and vulnerable sub-populations, and related effects.	The screening assessments are based on consideration of the available data and included various conservative exposure scenarios considered to account for both the general and vulnerable populations in Canada. Available information indicating that a specific subpopulation could be susceptible was considered in the screening assessment.

		<p>Hazard information from occupational settings, especially epidemiological data, was considered in the screening assessment, where available and appropriate. Epidemiological data were available for the assessment of site-restricted PRGs, however, they were considered inadequate to inform decision making.</p> <p>Information gathered and outcomes of assessments conducted under the Chemicals Management Plan, of which the Petroleum Sector Stream Approach is a part, may be used to inform decisions concerning additional actions to minimize exposure to workers. While occupational exposure is not considered in the assessment, assessment outcomes are shared with appropriate occupational health and safety jurisdictions.</p>
<p>SNAc Provisions</p>	<p>Clarification of the health benefits of a SNAc provision in addition to regulatory practices and measures is requested.</p>	<p>The application of the Significant New Activity (SNAc) provisions under CEPA 1999 is intended to ensure that new uses potentially of concern for a substance are not introduced without the Ministers conducting an evaluation of the risks associated with the new use. In the case of these PRGs, it has been determined that application of the SNAc provisions to these substances will not be pursued at this time.</p>