

Summary of Public Comments Received on the Government of Canada’s draft screening assessment report on non-pesticidal uses of six substances: trifluralin, atrazine, chlorothalonil, chlorophacinone, methoxychlor, pentachlorophenol

Formal comments made during the 60-day public comment period that took place from June 23rd, 2007 to August 22nd, 2007 on the draft screening assessment report of the six pesticides were provided by: Canadian Consumer Specialty Products Association, Crop Life Canada and Syngenta

A summary of comments and responses is included below.

Comment	Response
Submissions support the intent to amend the DSL for these six substances and to apply SNAc provisions.	No action required.
Submissions state they did not find the reference to the screening assessment for these six substances in the <i>Canada Gazette</i> , Part 1, March 24, 2007.	The date provided in the statement should have read “June 23, 2007”.
Submission states it would like a process established through which users of such priority substances are consulted for input on draft documents prior to their public release.	Publication of the draft document for public comment constitutes the consultation process for all stakeholders.
Submission states that as the basic manufacturer, it supports the conclusion that there have never been sales of atrazine or chlorothalonil for any uses other than pest control.	No action required.
Submission requests that the import/sales numbers for pesticides, as well as references to the toxicity of these substances, be removed from the document.	The import/sales numbers for pesticides are not included in the final Screening Assessment.
Submission requests that reference to these substances being CEPA-toxic be removed, specifically for atrazine and chlorothalonil (rationale being these products are only used in pest control).	Inherent toxicity, which is based on hazard, should not be confused with the risk-based criteria under section 64 of CEPA 1999. The final Screening Assessment concludes that these substances do not meet the section 64 criteria of CEPA 1999 at this time, precisely because no non-pesticidal uses or releases have been identified.
Submissions have concern with the Draft Entry Characterization posted for these substances and they wish to have this document removed from the website; the submissions state the information is contrary to that provided in assessments conducted by the PMRA.	Once published, the final Screening assessment replaces the Draft Entry Characterization. The final Screening assessment references the re-evaluations being conducted by PMRA. Categorization decisions were not further evaluated in the final Screening Assessment because no non-pesticidal uses or releases were identified. Further evaluations for new activities (other than those covered under the PCPA) would be undertaken subject to the Significant New Activity provisions specified under subsection 81(3) of CEPA 1999.
Submissions request that, with respect to	For the screening assessment of registered pesticides on the

Comment	Response
<p>pesticides and substances having only pest control uses, risk assessments completed by the PMRA serve as the Government of Canada assessments. A single Federal Government assessment would then ensure that information provided by the Government is consistent.</p>	<p>DSL under CEPA 1999, the approach is to conduct an entry characterization of the substances in Canada and then evaluate any non-pesticidal releases and sources. References to the re-evaluations being conducted by PMRA are provided.</p>
<p>Submission states that Health Canada considers this information as part of their risk assessment, and it contradicts the information in PMRA re-evaluation assessments.</p>	<p>Categorization decisions were not further evaluated in the final screening assessment. It is noted in the screening assessment that hazard properties may be re-examined and revised during re-evaluations of these substances under the PCPA. References to the re-evaluations being conducted by PMRA are provided.</p>
<p>Submission would like clarification on the statement (pertaining to each of atrazine and chlorothalonil) “was determined to be inherently toxic to humans based on a classification of Group III: possibly carcinogenic to humans” according to HC’s Guidelines for Drinking Water Quality.</p>	<p>This refers to the human health categorization decisions which were presented but not further evaluated in the Screening Assessment. Text has been corrected and the proper reference (Health Canada, 2006) has been included in the final screening assessment.</p>