

Summary of Public Comments received on the Challenge substance 1,2-benzenediol (CAS RN 120-80-9) (Catechol) Proposed Risk Management Approach document for Batch 1

Comments on the proposed risk management approach for 1,2-benzenediol to be addressed as part of the Chemicals Management Plan Challenge were provided by The Catechol Coalition and The Canadian Environmental Law Association and Chemical Sensitivities Manitoba.

Comment	Response
<p>No further risk management measures are warranted with regards to catechol as the screening assessment report recognises that Canadians' exposure to catechol through industrial and commercial uses is negligible.</p>	<p>To prevent increases in exposure of catechol, the application of the Significant New Activity provisions under the <i>Canadian Environmental Protection Act, 1999</i> (CEPA 1999) to this substance will be recommended. This would require that any proposed new manufacture, import or use be subject to further assessment, and would determine if the new activity requires further risk management consideration.</p>
<p>Due to its carcinogenicity, we oppose the government's proposal to apply a notice for future use for 1,2-benzenediol (CAS RN 120-80-9).</p>	<p>The current exposure to the general population from catechol is low and already risk managed. In order to prevent increases in exposure of catechol, the application of the Significant New Activity provisions under CEPA 1999 to this substance will be recommended. This would require that any proposed new manufacture, import or use be subject to further assessment, and would determine if the new activity requires further risk management consideration.</p>
<p>Thresholds should be based on a significant risk impact rather than a significant new activity. It was suggested that the government should try and set a workplace exposure limit as part of a risk based approach. The provinces already use a workplace exposure limit for occupational exposures; however, this would not address any possible new future uses in products which may impact Canadian consumers outside of a controlled work environment.</p>	<p>Health warning labels are currently affixed to all consumer chemicals in accordance with the <i>Consumer Chemicals and Container Regulations, 2001</i>. Since both workplace exposures and environmental releases are already controlled under existing regulations and these regulations also apply to any proposed future new uses, it is unnecessary to propose a further regulatory burden that is not likely to result in any benefit to human or environmental health.</p>