



Overview of Data Gathering Activities under the Chemicals Management Plan

**GlobalChem
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Overview

- **Challenge Initiative**
 - Call for information
 - Substance profiles
 - Voluntary questionnaires
 - Canadian Environmental Protection Act (CEPA) Section 71 Notices
 - Responding to the call for information
- **Inventory Update for the Domestic Substances List (DSL)**
 - Current status of the DSL
 - Purpose of an Inventory Update for Canada's DSL
 - Considerations in designing an Inventory Update
 - Next steps



Call for Information – Substances in the Challenge

- Starting in February 2007, the Government of Canada began publishing batches of 15-30 substances indicating the start of the Challenge process for those substances.
 - The first step following publication in Canada Gazette is a six month call for information facilitated by three products:
 - substances profiles
 - mandatory surveys
 - questionnaire.
- After the six month call for information, all submissions are reviewed by Government of Canada scientists to determine what actions may be necessary to ensure that the health of Canadians and their environment are protected.
- Government of Canada scientists have a **maximum of 6 months** to publish a screening assessment.



Substance Profile Documents

- Outlines the current understanding of the substance.
- Justify, within the context of the Challenge, the basis for taking actions on a substance that was identified as a high concern through the categorization activities.
- Identify opportunities to submit information to support the activities taking place under the Federal Chemicals Management Plan.
- Technical information:
 - Appendix I - Human Health Information
 - Appendix II - Ecological Information



Challenge Questionnaire

- The Challenge questionnaire identifies information that could contribute to the development of risk management approaches.
- The information requested includes:
 - Import, manufacture and use quantities;
 - Substance and product use details;
 - Releases to the environment and spill management;
 - Information to inform the development of detection methods;
 - Current and potential risk management and product stewardship actions;
 - Existing legislative or regulatory programs controlling/managing the substance; and
 - Information to support the development of a regulatory impact assessment.



CEPA Section 71 Notices

Pursuant to Section 71 of the *Canadian Environmental Protection Act*, 1999, the Minister may publish in the *Canada Gazette* a notice:

- Requiring any person who is described in the Notice and within the period specified in the Notice engaged in any activity involving the substance to notify the Minister (71(1)(a))
- Requiring any person who is described in the Notice, to provide the Minister with any information and samples, including in respect of a substance, available toxicological information, monitoring information, samples of the substance and information on the quantities, composition, uses and distribution of the substance and products containing the substance (71(1)(b) and 71(2)(a))



Responding to S.71 Notices

- Canadian companies must respond to the Section 71 notice if during the 2006 calendar year they:
 - **manufactured** or **imported** a substance, whether alone, in a mixture, product or manufactured item (100 kg threshold)
 - **used** a substance, whether alone, in a mixture, in a product or in a manufactured item during the 2006 calendar year (1,000 kg threshold)
- How do I know if my company is involved with a substance:
 - People must respond if they are aware that an item contains a substance that is targeted.
 - Required to provide information in company's possession or to which you are reasonably expected to have access.



Information Requirements for S.71 Notices

- CAS RN and name of the substance
- Total quantity of the substance that was manufactured, imported, used.
- NAICS code(s) that applies to activity with the substance or mixture, product or manufactured item, containing the substance
- Use pattern code that applies to the substance, or the substance in the mixture, in the product or in the manufactured item
- Top five trade names
- Type of mixture, product or manufactured item and concentration of the substance
- Name and head office address of supplier (for users)
- Know or anticipated final mixture, product or manufactured item (for users)
- Name and address of facility where substance was manufactured, imported or used
- Total quantity of the substance that was released or transferred off-site.
- Procedures or policies in place to prevent or minimize releases of the substance to the environment and/or potential of exposure to individuals
- Studies or data that measure the effect of the procedures/policies
- Studies or data that measure the exposure to the substance



How Will the Information be Used?

- The information collected will be used to inform risk assessment and management, and will allow the Government of Canada to:
 - Refine its understanding of the substance;
 - Identify any existing programs that collect information that may facilitate benchmarking of the substances' use and release;
 - Determine potential exposure pathways to humans and the environment so that risk assessment and management can be properly targeted;
 - Develop risk assessments for the substances;
 - Acquire information that will inform the Risk Management Approach and where appropriate, instrument selection.



How to respond?

- **Responses to the notice must be submitted to:**
DSL Surveys Coordinator
Existing Substances Program
Place Vincent Massey, 20th Floor
351 Saint Joseph Boulevard, Gatineau QC K1A 0H3
Tel: 1-888-228-0530/819-956-9313 Fax: 1-800-410-4314/819-953-4936
Email: DSL.SurveyCo@ec.gc.ca
- **Notice and detailed guidance document for completion of the notice are available through the Chemical Substances website:**
 - <http://www.chemicalsubstances.gc.ca>



Inventory Update for Canada's Domestic Substances List



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Current Inventory Status - Canada

- Compilation of the Domestic Substances List to distinguish between new and existing substances
- Substances in commerce in Canada at >100 kg/yr between 1984 and 1986
- Required manufacturers and importers to report on activity and volume range for >100 kg (1986 data)
- Did not include manufactured articles, incidental reaction products, transient reaction intermediates, by-products, effluents, emissions and wastes
- Quantity information from the DSL compilation process is incomplete and 20 years old.
 - Substances no longer in commerce.
 - Represents a substance inventory “snapshot in time”, not an accurate volume inventory



Why Design A Canadian Inventory Update

- DSL was compiled in the 90s using 1984 to 86 data.
- Approximately 4300 substances were identified by DSL Categorization.
- Chemicals Management Plan (2007 – 2010) targets:
 - Higher concern substances (PBiTs; high concern to human health)
 - Low concern substances (Rapid Screening)
- Inventory Update will be used to:
 - Priorization of assessments for other substances
 - Risk management for the protection of ecological and human health
 - Identification of substances that may affect target populations
 - Validation of assessments decisions
 - Report on international commitments
 - Contribute to Canada's long term science and monitoring plan
 - Contribute to the identification of emerging issues



Design Parameters – Dependant on Purpose of Update

- A cyclical update would contribute to the current understanding and ongoing initiatives associated with Canada's chemical inventory.
 - DSL Categorization = Generally hazard based
 - Potential use by children or other vulnerable populations
 - Intended use in personal care products
 - Intended use is in foods and drugs
 - Other legislative information needs (e.g. Food and Drug Act)



Canadian Approaches to the Development of an Inventory Update

- Work with stakeholders on the overall approach
- Simplified approach for reporting data
 - Lessons learnt from S.71 Notices
 - Lessons learnt from US-EPA
- Internet based approach for submitting data
- Many of the approaches (e.g. questions on how to request data, data analysis, confidentiality) are being piloted during the Challenge Initiative.



Next Steps in Identifying a Canadian option

- The Government of Canada is determining its data requirements:
 - Information that furthers the understanding of Canada's chemical inventory.
 - Balanced approach based on information requests by other programs.
 - Consideration of information requirements in other jurisdictions.
- Internal consultations on the specifics of data needs
- Consultations with industry, NGOs, and other interested stakeholders will be scheduled for Spring 2008.
- Anticipated timeline for a release of an Inventory Update for the DSL is 2009.



Questions / Comments



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