



Government  
of Canada

Gouvernement  
du Canada

# Overview of Information Gathering Activities on Existing Substances under the Chemicals Management Plan

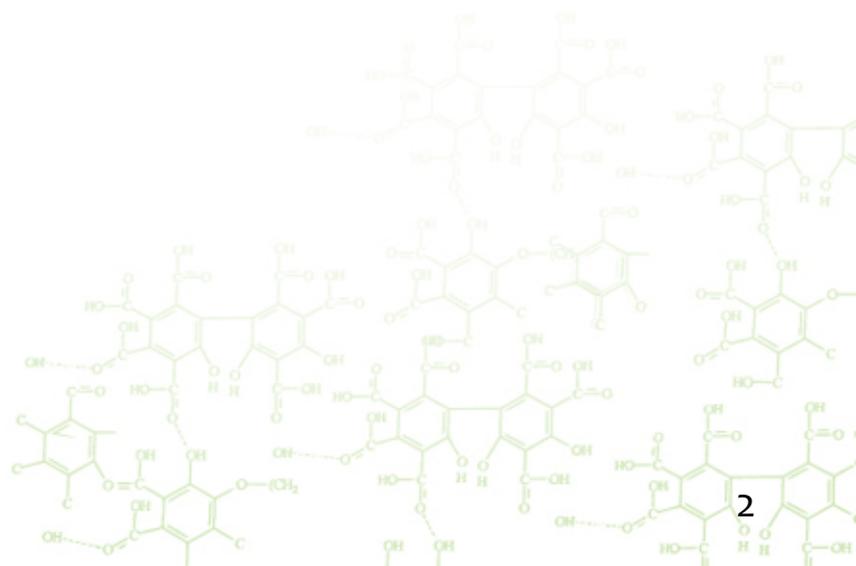
Health Canada – PAHO Workshop  
Lima, Peru  
November 8-10, 2016



Canada 

# Purpose

- Overview of the various types of information gathering activities conducted (mandatory and voluntary)
- Overview of the process for mandatory information gathering activities
- Key Challenges
- Lessons Learned



# How Are Data Gathered?

- A variety of mechanisms are used to gather the required information:
  - Research and monitoring (e.g. biomonitoring)
  - Other programs and departments within the Federal Government (NPRI, HC, NRCan, CBSA, Stats Can).
  - Key international partners (US EPA, REACH Consortia)
  - Voluntary data gathering initiatives
  - Associations and joint industry submissions
- Section 71 of CEPA 1999 used for the mandatory data gathering from industry to address remaining critical data needs

NPRI = National Pollutant Release Inventory

HC = Health Canada

NRCan = Natural Resources Canada

CBSA = Canadian Border Services Agency

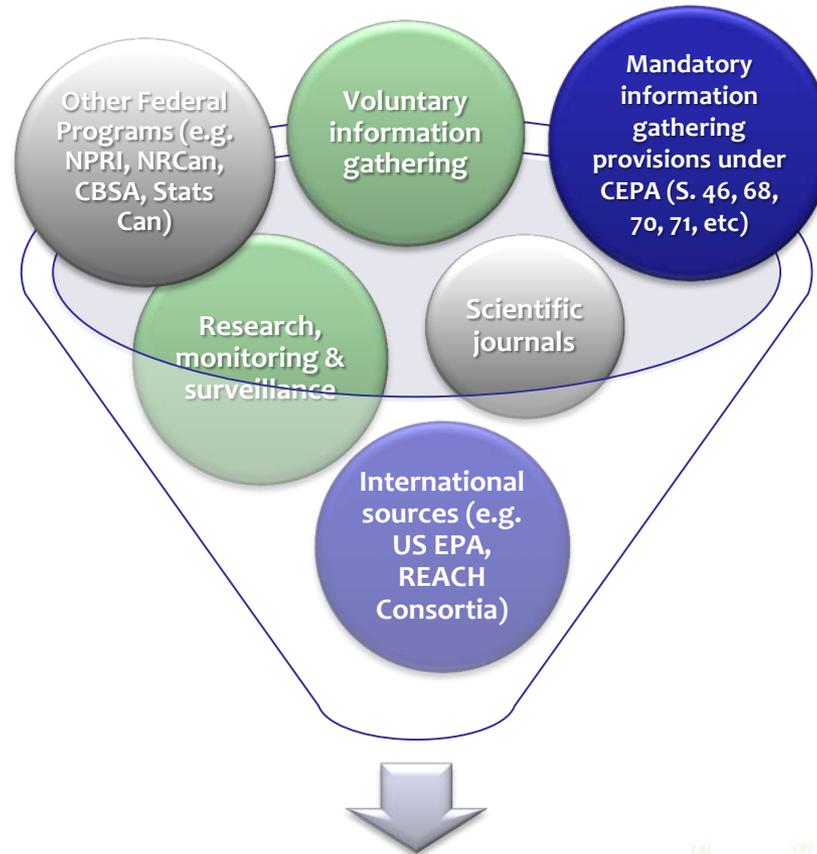
Stats Can = Statistics Canada

US EPA = United States Environmental Protection Agency

REACH = Registration Evaluation Authorisation Restriction

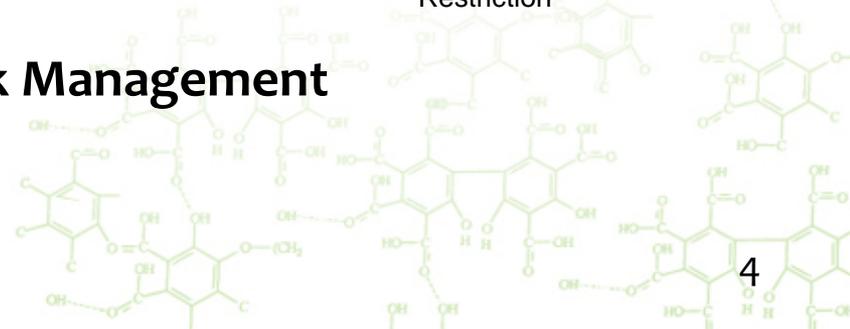


# How Are Data Gathered?



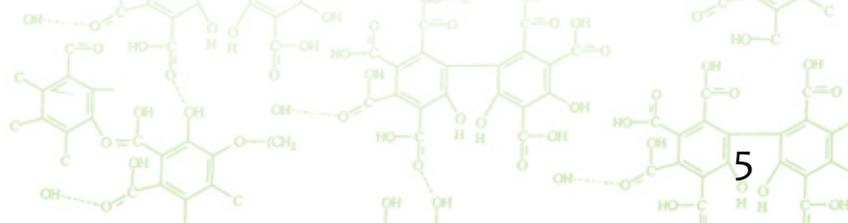
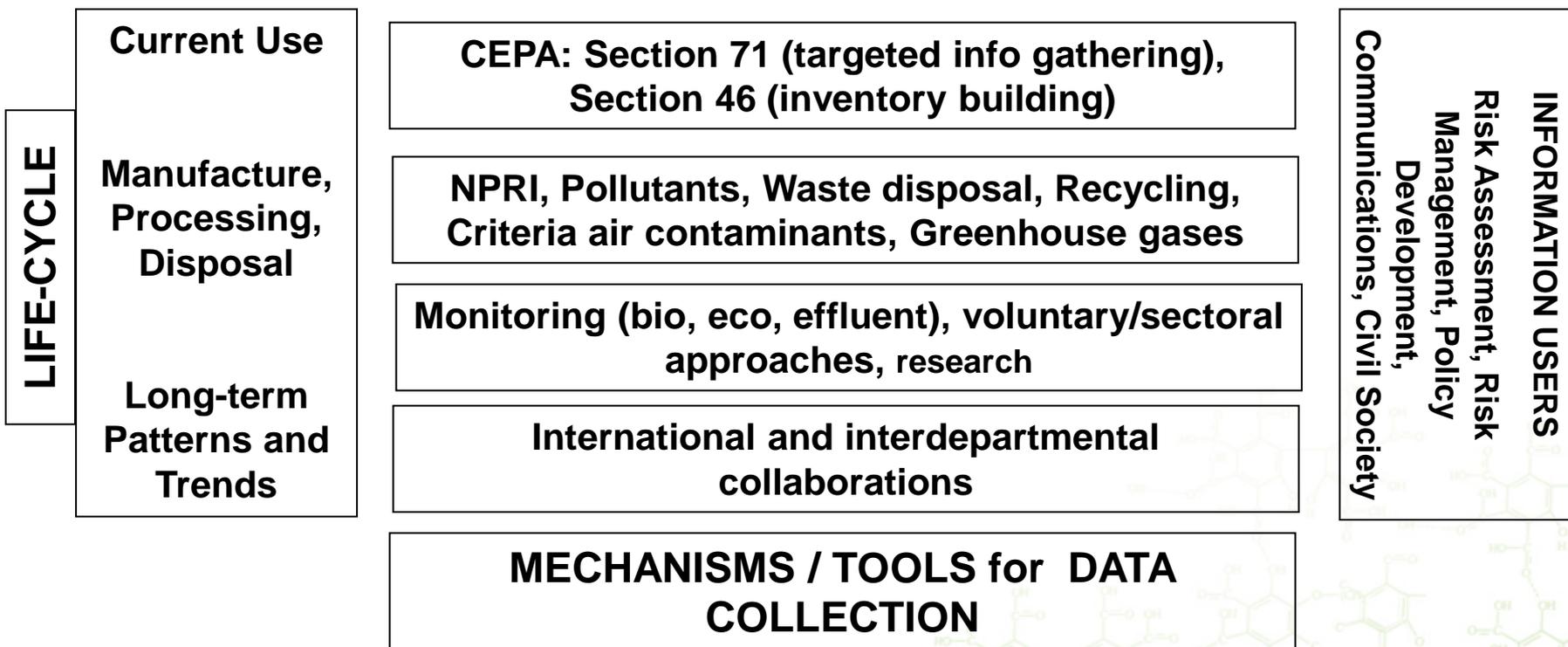
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**Risk Assessment & Risk Management**



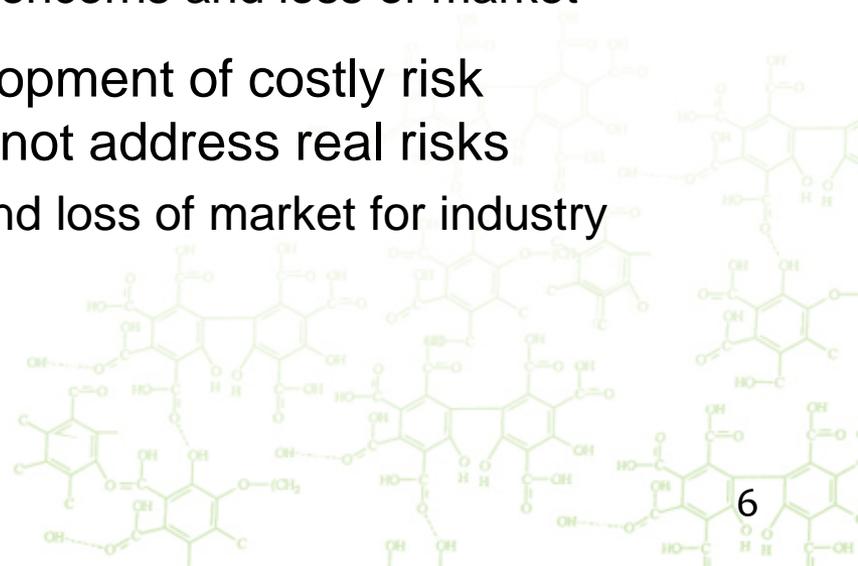
# Data Collection: part of a broader approach

Data collection is used to support life cycle analysis of potentially harmful substances and assess releases to the environment and exposure to humans



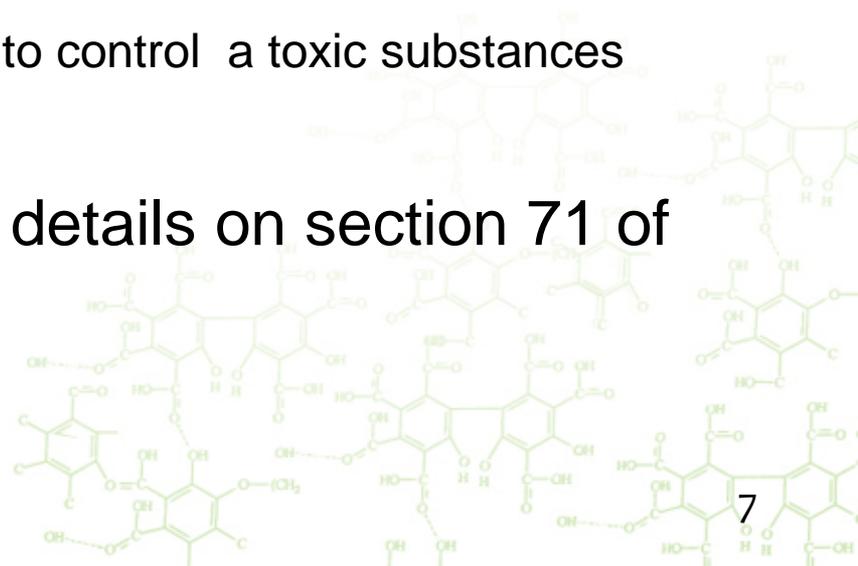
# Data Gathering Considerations

- Without data gathering, the Government would be faced with making decisions which:
  - may result in failing to identify and address risks to human health and the environment
  - could lead to use of assumptions that identify concerns with substances, which may not be the case with more accurate data
    - May lead to unnecessary public concerns and loss of market
  - could potentially lead to the development of costly risk management instruments that do not address real risks
    - May lead to unnecessary costs and loss of market for industry



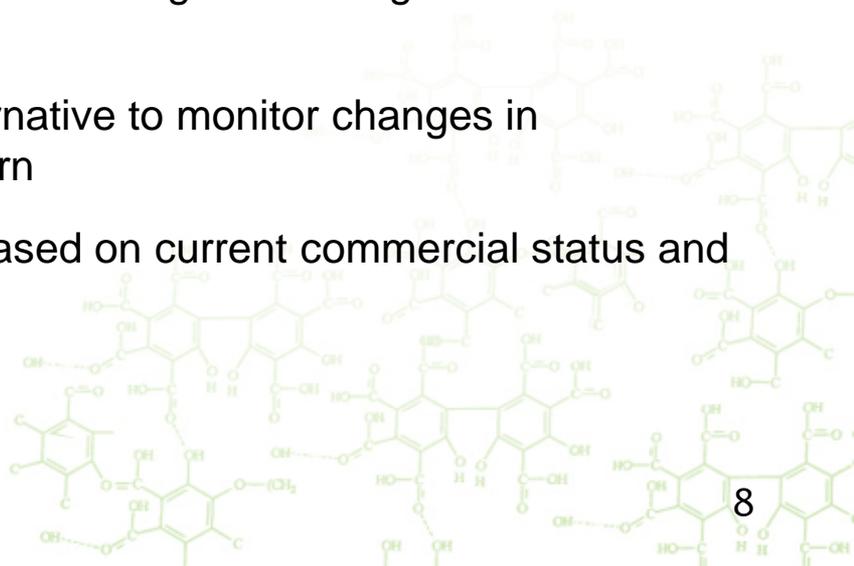
# Mandatory Data Collection Under CEPA

- Section 71 Notices:
  - Information gathering conducted under the authority of the Canadian Environmental Protection Act, 1999 (CEPA1999)
  - Used to:
    - Update the commercial status of substances
    - Inform risk assessment and management activities
  - Notice is issued to gather information that will be used to:
    - assess whether a substance is toxic or capable of becoming toxic; or
    - assess whether to control or how to control a toxic substances listed in Schedule 1
- Appendix 1 provides additional details on section 71 of CEPA



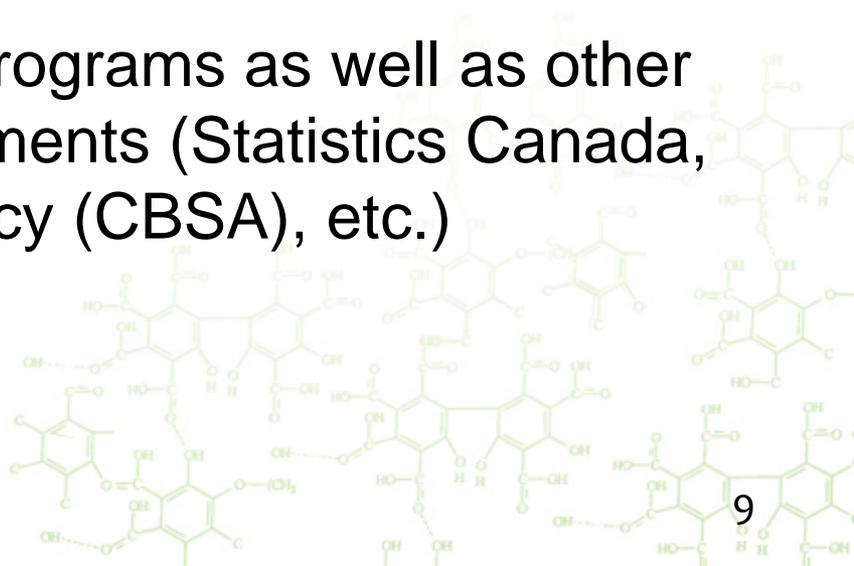
# Domestic Substances List Inventory Update (DSL IU)

- The DSL does not reflect a current picture of the commercial status of substances in Canada
  - Information is dated, some substances may no longer be in commerce, or their use and volume may have changed
- The upcoming IU is proposed to be an on-going, cyclical approach that will enable the Government of Canada to determine, validate and/or track the commercial status of substances of potential concern.
- The IU would collect basic information which would:
  - Inform activities in Risk Assessment and Risk Management Programs for substances of concern
  - Provide a predictable and coordinated alternative to monitor changes in commercial status for substances of concern
  - Inform priority setting for post-2020 work based on current commercial status and available information



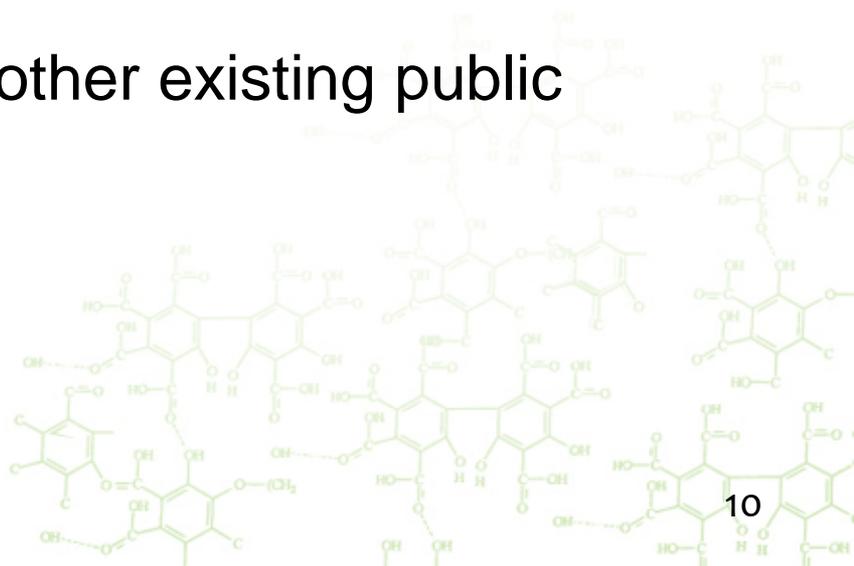
# Voluntary Information Gathering

- Direct stakeholder engagement, voluntary questionnaires and Stakeholder Interest Forms
  - Targeting known stakeholders expected to have the information required
  - Voluntary questionnaires (alone, or before a s.71 notice)
  - Voluntary forms to be filled out during mandatory collection periods for stakeholders who are not required to respond
- Data sharing with EC and HC programs as well as other Government of Canada Departments (Statistics Canada, Canadian Board Services Agency (CBSA), etc.)



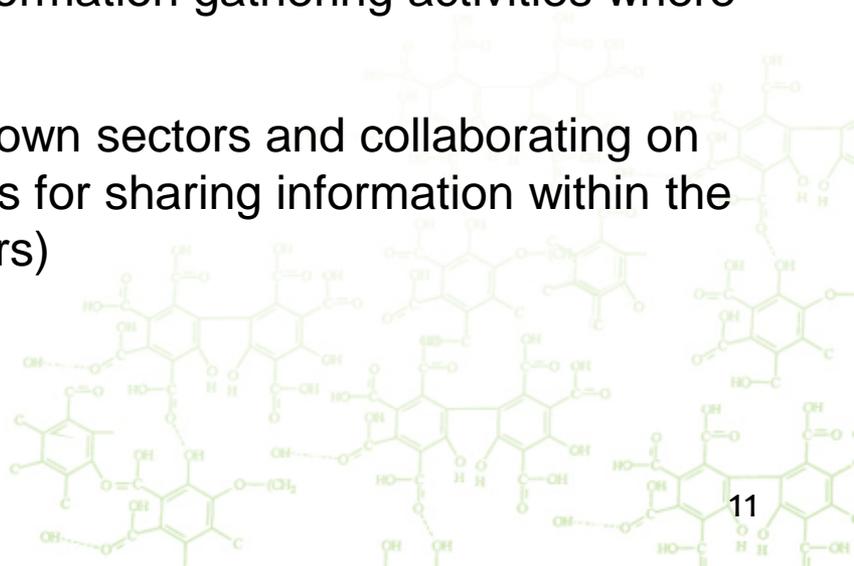
# Voluntary Information Gathering

- The Sector Approach and supply chain engagement
  - Working with associations/sector representatives who provide information on behalf of a sector
  - Facilitate supply chain discussions by working with associations and foreign suppliers to obtain required information
- International data sharing agreements with industry consortia and other jurisdictions
- External scoping contracts and other existing public sources of data



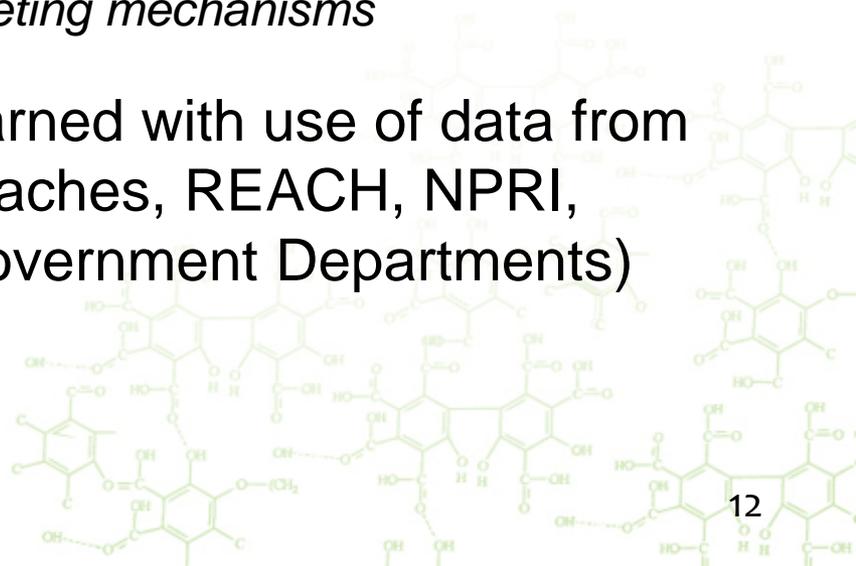
# Key Challenges

- Key compliance challenges identified by industry:
  - Large number of products / manufactured items
  - Lack of knowledge / awareness of substances in products / manufactured items (e.g. trace concentrations)
  - Obtaining information from foreign suppliers (e.g., CBI)
- To address these challenges, the Government can:
  - continue to streamline the scope of information gathering activities where possible
  - facilitate information exchange with known sectors and collaborating on improving and promoting best practices for sharing information within the supply chain (including foreign suppliers)



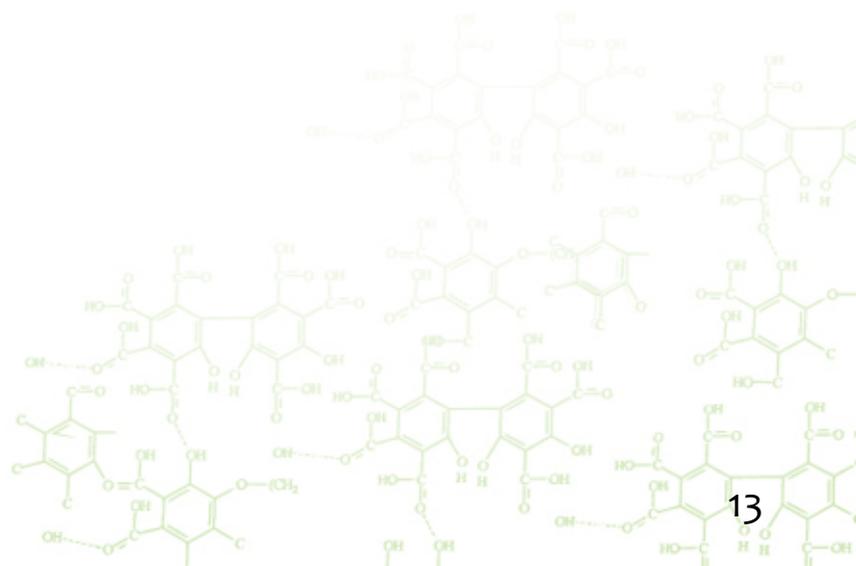
# Lessons Learned to Date

- Early engagement of and by stakeholders is key
- Maintain flexibility and continuous improvement moving forward
  - Promote stakeholder feedback
  - Perform data analysis to identify areas of improvement
  - Capitalize on sector and association approaches to address data needs
  - Tailored surveys have resulted in more detailed information received from more targeted respondents
    - *Appendix 2 identifies specifics targeting mechanisms*
- Taking stock of broader lessons learned with use of data from other sources (e.g. voluntary approaches, REACH, NPRI, Research and Monitoring, Other Government Departments)



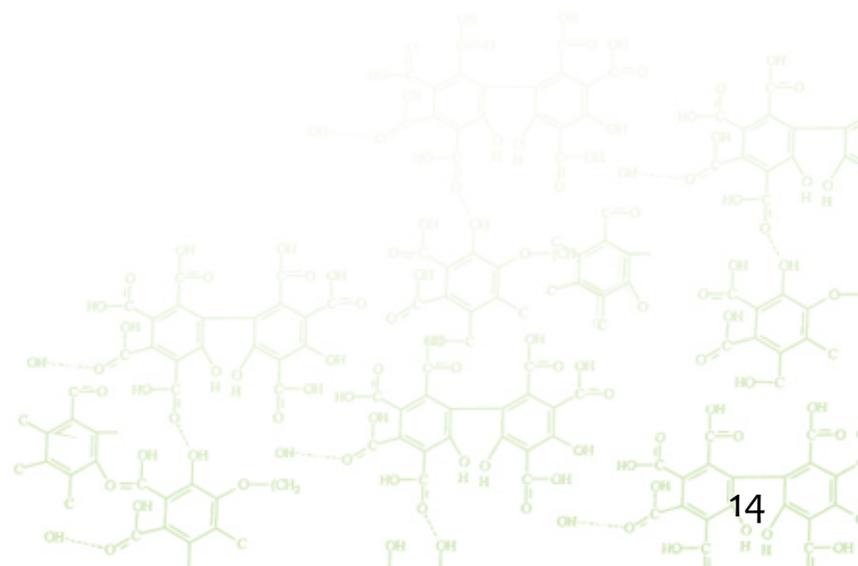
# Information Gathering Activities

- Questions?



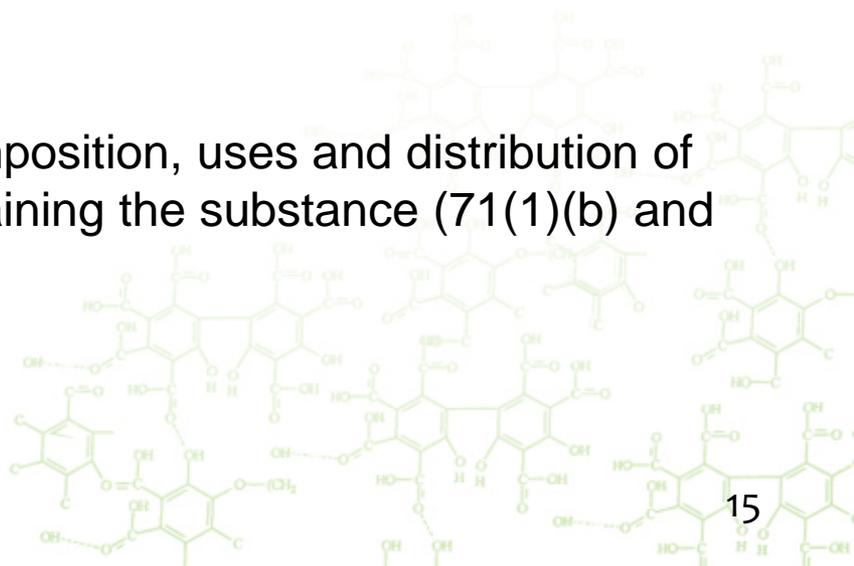
# Appendices

1. Section 71 details
2. Targeted approach



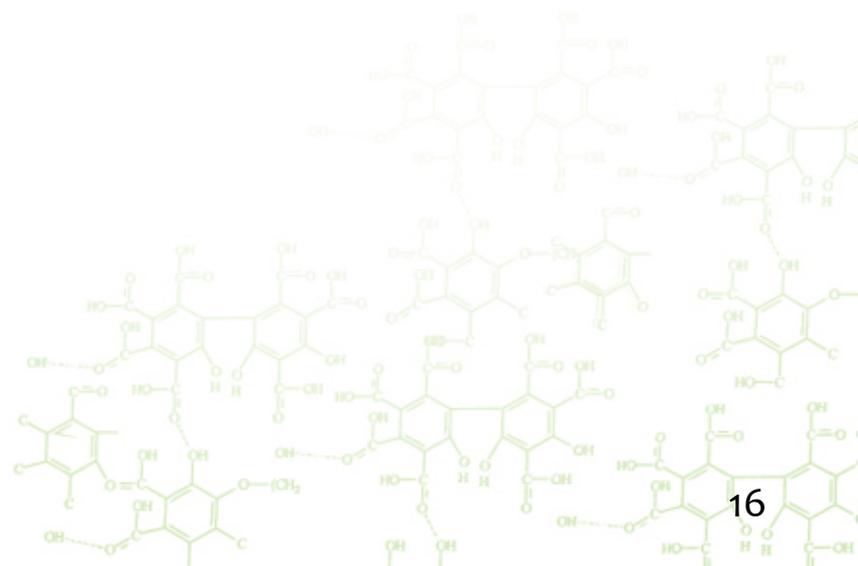
# Appendix 1 – Section 71 details

- A section 71 Notice requires:
  - Any person involved with a substance identified in a notice, within the period specific in the notice, to notify the Minister (71(1)(a))
  - Any person meeting the reporting requirements to provide the Minister with any information and samples (71(1)(b) and 71(2)(a)), including:
    - 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))



# Appendix 1 – Section 71 details

- When the Minister has reason to suspect that the substance is toxic or capable of becoming toxic, the Minister may also require that a person who is involved in the importation or manufacturing of the substance or any product containing the substance to conduct toxicological or other tests and submit the results of the tests to the Minister (71(1)(c))



# Appendix 2 – Targeted Approach

- Target manufactured items that have reasonable potential for exposure
- Refine scope for users that are of specific interest
  - Gather information on/from users that inform potential exposure sources
- Use of a reporting concentration threshold when appropriate
  - Nature of the potential hazard
  - Known/expected use of the substance
  - Function of a Substance in Final Product
- Reduce duplication with reporting:
  - exclusions for previously submitted data
  - availability of joint submissions

