

CHLORINATED PARAFFINS

INDUSTRY ASSOCIATION

1250 Connecticut Avenue, N.W. • Suite 700 • Washington, D.C. 20036 • 202-419-1500 • Fax: 202-659-8037

CPIA PREPARES TO RESPOND TO CANADIAN FOLLOW-UP RISK ASSESSMENT

On June 11, Environment Canada and Health Canada released for public comment Follow-up Reports on Chlorinated Paraffins (CPs). These reports have long been expected as Canada committed several years ago to update its assessments of CPs. The Chlorinated Paraffins Industry Association (CPIA) is in the process of critically reviewing these reports and intends to submit comments by the deadline, which is currently August 10.

In 1993, Canada declared short-chain chlorinated paraffins (SCCPs) as meeting the Canadian Environment Protection Act (CEPA) definition of “Toxic” to human health. At that time, Canada concluded that there was insufficient information to establish that medium-chain chlorinated paraffins (MCCPs) or long-chain chlorinated paraffins (LCCPs) met the CEPA Toxic definition to human health. Environment Canada further concluded that neither SCCPs, MCCPs nor LCCPs met the CEPA definition of Toxic to the environment.

In 1997, Environment Canada put forth a proposal that SCCPs should be classified as Toxic to the environment. Environment Canada further proposed SCCPs for control under Canada’s Toxic Substances Management Policy as a persistent, bioaccumulative and toxic compound. CPIA successfully challenged Environment Canada’s assertion arguing that there was not persuasive scientific evidence that SCCPs should be considered persistent and subject to Canada’s Track 1 (i.e., virtual elimination) program.

The CP industry was very surprised therefore to read in the June 11 notice, Canada’s assertion that essentially all chain length CPs¹ should be considered Toxic to human health and the environment, particularly since most of the toxicological information that has become available since the 1993 and 1997 decisions is reasonably favorable to chlorinated paraffins.

The CP industry has been a strong advocate that these compounds can be effectively managed in a manner that is safe for human health and the environment. The industry has further encouraged Canada to adopt appropriate life cycle management regulations to ensure that there is proper management by all facilities in Canada.

¹ The Environment Canada assessment does not pertain to solid grade LCCPs.

It appears that the basis for Canada's position is the application of very conservative assumptions in its assessments. For example, in what appears to be a break from traditional risk assessment approaches, Environment Canada did not rely on standard dilution factors to calculate CP concentrations expected in receiving waters. Environment Canada claims it used this approach because it is classifying these compounds as persistent.

Similar to its 1993 and 1997 comments, CPIA intends to submit a comprehensive set of comments designed to once again persuade Canada that these compounds can be effectively managed and do not deserve the very conservative treatment recommended.

CPIA is in the process of critically reviewing these new Canadian Follow-up Reports in order to develop comments. Companies that have commercial interest in the manufacture, processing and use of chlorinated paraffins in Canada, are encouraged to actively participate in this proceeding. Please complete the contact form on the CPIA web site if you are interested in working cooperatively with CPIA and being kept informed of any new developments (www.regnet.com/cpia).

For additional information, contact:

Robert J. Fensterheim
Executive Director
Chlorinated Paraffins Industry Association
1250 Connecticut Avenue, NW
Suite 700
Washington, DC 20036
Phone: 202-419-1500
Fax: 202-659-8037
E-mail: info@regnet.com

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