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CITIZENS ENVIRONMENT ALLIANCE
of southwestern Ontario

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Re: Draft Screening Assessment Report and Risk Management Scope for Coal Tars and Their Distillates

The Citizens Environment Alliance (CEA) is a non-profit, grass-roots, international, education and research organization focused on Great Lakes basin environmental issues.

The CEA supports the proposed recommendation of the addition of “coal tars and their distillates” to the List of Toxic Substances in Schedule 1 of the Act.

The proposed environmental and human health objectives for coal tars and their distillations products as well as the proposed risk management objectives for coal tars and their distillates are laudable. However, we are concerned that while conducting

a review of the effectiveness of existing federal and provincial risk management actions controlling the releases of PAHs and benzene from the handling and storage of coal tars and their distillates at steel mills; and of provincial risk management actions controlling releases of PAHs and benzene from the processing, handling and storage of coal tars and their distillates at coal tar refining facilities

will unnecessarily delay effective measures that have already been implemented in other jurisdictions.

Communities in the United States have already moved to ban the use and sale of coal tar pavement sealants.¹ Annex XIV of the European Registration, Evaluation, Authorisation and Restriction of Chemicals regulation allows for the banning of products in the marketplace. The experience of other jurisdictions has shown that banning the use of coal tar sealant products has had a significantly beneficial impact upon the reduction of deleterious PAHs.

In conclusion, the CEA supports the proposed recommendation of coal tars and their distillates to the List of Toxic Substances in Schedule 1 of the Act. The CEA also recommends that the federal government move quickly in implementing a national ban on the sale and use of coal tar based pavement sealants and coal tar as listed in the Drug Products Database.

¹ For example see,
http://www.mlive.com/news/ann-arbor/index.ssf/2016/06/ann_arbor_bans_toxic_pavement.html and
<http://pubs.acs.org/doi/abs/10.1021/es405691q>