

October 20, 2023

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Submitted via email: ccpsa-lcspc@hc-sc.gc.ca

Subject: HCPA Comments on the Notice of intent – Proposed new requirements for consumer chemical products under the *Canada Consumer Product Safety Act*

The Household & Commercial Products Association¹ (HCPA) appreciates the opportunity to offer comments on Health Canada's Notice of Intent (NOI): Proposed new requirements for consumer chemical products under the *Canada Consumer Product Safety Act*. HCPA submits these comments in support of the comments and responses submitted by the Canadian Consumer Specialty Products Association (CCSPA).

HCPA is a voluntary, non-profit U.S. trade association representing approximately 240 companies engaged in the manufacture, formulation, distribution, and sale of products for household, institutional, commercial, and industrial use. HCPA member companies' wide range of products includes home, lawn and garden pesticides, antimicrobial products, air care products, automotive specialty products, detergents and cleaning products, polishes and floor maintenance products, and various types of aerosol products.

The objective of this NOI is to protect Canadians from certain human health hazards of concern (HHHOCs) in consumer chemical products under the *Canada Consumer Products Safety Act* (CCPSA). Considering consumers rely on product labels for information about the safe use of a chemical or product and its potential effects, HCPA believes that a risk-based approach is most appropriate, in which not only the hazard of a chemical is considered, but exposure data, whether obtained or generated hypothetically based on customary use, is applied to provide meaningful information to consumers without creating confusion or challenges with readability.

¹ The Household & Commercial Products Association (HCPA) is the premier trade association representing companies that manufacture and sell \$180 billion annually of trusted and familiar products used for cleaning, protecting, maintaining, and disinfecting homes and commercial environments. HCPA member companies employ 200,000 people in the U.S. whose work helps consumers and workers to create cleaner, healthier and more productive lives.

Given how important Canada and the United States are as trading partners, regulatory alignment between the two benefits consumers, regulators, and the regulated community by reducing the barriers to market entry, increasing the number of options available to consumers and access to innovation, and enhancing regulatory coordination and transparency. With this in mind, HCPA recommends that Health Canada considers the U.S. Consumer Product Safety Commission's (CPSC) Chronic Hazard Guidelines.² The CPSC guidelines provide guidance on determining toxicity (*e.g.*, carcinogenicity, neurotoxicity, bioavailability), acceptable daily intake (threshold for uptake into body), assessing exposure, and risk assessment approaches and acceptable risk, and are referenced in the United Nations (UN) Globally Harmonized System of Classification and Labelling of Chemicals (GHS) Annex 5³ as an example of a risk-based labeling approach. The use of these guidelines in Canada would advance regulatory harmonization between Canada and the United States and promote more consistent consumer chemical product labels.

As Health Canada explores potential updates to the current consumer chemical product framework, HCPA recommends that additional stakeholder engagement opportunities be scheduled so that an eventual proposal can be supported by all stakeholders.

HCPA would like to thank Health Canada for this opportunity to provide input in the NOI. HCPA supports the addition of a risk-based HHHOC classification model in which Canadian consumers are protected from chronic hazards with meaningful, clear, and concise warnings. HCPA provides this letter in support of the comments and responses submitted by the CCSPA. If there are any questions with the contents of this letter, please contact me at ngeorges@thehcpa.org.

Respectfully submitted,



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² 16 CFR 1500.135

³ See A5.2.2