

Summary of Public Comments received on Long-Chain (C9-C20) Perfluorocarboxylic Acids (PFCAs).

Comments on the draft screening assessment report for Long-Chain (C9-C20) Perfluorocarboxylic Acids (PFCAs) were provided by the Canadian Environmental Law Association and Chemical Sensitivities Manitoba, and the Telomer Research Program and Fluoropolymers Manufacturing Group

A summary of comments and responses is included below, organized by topic:

- Scope
- Persistence
- Proposed Risk Management

TOPIC	COMMENT	RESPONSE
Scope	The government should release the human health assessment for Long-Chain (C9-C20) Perfluorocarboxylic Acids (PFCAs), regardless of its finding that the chemicals in the grouping were not considered high priority to human health.	Health Canada has not assessed the long-chain PFCAs for risk to human health, however, it was considered important to publish the ecological Screening Assessment Report (SAR) in order to initiate the implementation of risk management measures as well as fulfill the Government's commitment to assess PFCAs under the <i>Perfluorinated Carboxylic Acids (PFCAs) and Precursors: An Action Plan for Assessment and Management</i> .
	All precursors to long-chain PFCAs should be included in the scope of the screening assessment, including those identified by the Organisation for Economic Co-operation and Development (OECD) process.	The screening assessment considers any precursor to long-chain (C9-C20) PFCAs which could transform or degrade to long-chain PFCA given similar use applications and similarities in their physical-chemical properties and structures. The long-chain PFCA precursors identified in this assessment can also be found on OECD list in Appendix I of the screening assessment, which provides examples of substances in this group. As this list is not considered exhaustive it is open to including other precursors to long-chain PFCAs (C9-C20) as they are identified by other governmental organizations and/or in other literature.
Persistence	The screening assessment has not used models to determine long-range transport potential as has been applied in screening assessments of other substances	Empirical evidence (e.g., measurements of long-chain PFCAs in Canadian Arctic biota and abiotic media) is sufficient to confirm the long-range transport potential of precursors to long-chain

	<p>under the Chemicals Management Plan.</p> <p>The conclusion of the screening assessment for long-chain PFCAs should confirm that these chemicals have long-range potential since this information will influence the type of management measures necessary to prevent the formation of long-chain PFCAs.</p>	<p>PFCAs given that long-chain PFCAs are not manufactured or imported into Canada. A statement has been added to the conclusion indicating that the precursors to long-chain PFCAs have the potential for long-range transport.</p>
	<p>The notion that branched versus linear isomer ratios can be used to attribute sources is uncertain given the differences in uptake, clearance, and partitioning</p>	<p>The discussion in the screening assessment has been re-written to reflect this uncertainty</p>
Proposed Risk Management	<p>The use of fluorochemicals or fluorinated polymers in various consumer products such as carpets, textiles, upholstery, clothing, and food contact materials and cookware should be prohibited as this may contribute to the formation of long-chain PFCAs.</p>	<p>The RM Scope proposes a prohibition on long-chain PFCAs and more than 80 identified precursors. The proposed prohibition on the use, sale, offer for sale, import and export of long-chain PFCAs and their precursors will reduce the amount of these chemicals entering the Canadian market.</p> <p>The Environmental Performance Agreement (PA) in place since March 2010 is working towards the reduction and eventual elimination of residual PFOA, long-chain PFCAs and their precursors from the perfluorochemical products.</p>
	<p>Why is prohibition of long-chained PFCAs only “where substitutes are economically and technically feasible.” Toxicological data have indicated the need to replace these substances with safer alternatives.</p>	<p>In the upcoming months, Environment Canada will gather further socio-economic data and consult with stakeholders on the appropriate risk management measures to be proposed to address long-chain PFCAs across their life-cycle.</p>
	<p>The measures to prohibit should not be cumbersome and should address the full cycle of the substances. Therefore, the prohibition should include manufacture, use, offer for sale, import, export and disposal of long –chain PFCAs, its salts and</p>	<p>The Government of Canada is undertaking research, evaluating findings from new studies, collecting information and investigating potential releases of toxic substances from waste management (e.g. landfills) and recycling facilities in Canada. These substances would continue to be included in any monitoring</p>

	precursors, including in products or waste stockpiles.	from the waste sector, if needed. Based on the findings, the Government of Canada will implement further risk management activities if warranted.
	The Government should include explicit acknowledgement and action plans for the protection of vulnerable populations and ecosystems in regulatory measures for long-chain PFCAs, their salts and their precursors.	<p>The Risk Management Scope notes that PFCAs have been found in Arctic wildlife (polar bears, whales, seals, birds and fish), as well as and in Great Lakes wildlife. It is also stated that the evidence indicates that PFCAs and their precursors are subject to long-range transportation.</p> <p>The information developed through the final assessment will be used to inform the most appropriate risk management measure to minimize releases to the environment.</p>
	The federal government should exclude the use of voluntary measures, including EPAs, to achieve the phase out and elimination of PFCAs. Management measures should only focus on regulatory-based measures to ensure the protection of the environment and human health.	<p>The Government of Canada considers the use of a voluntary measure, such as an Environmental Performance Agreement (EPA), where they offer the prospect of significant measurable environmental results, and encourages early action on substances of concern. Performance Agreements are often part of a suite of risk management tools, and complement future risk management options.</p> <p>A multi-instrument approach for the risk management of PFCAs has been outlined in the <i>PFCAs and Precursors: an Action Plan for Assessment and Management</i> (2006). The risk management actions and instruments listed as part of the risk management approach include controls to mitigate the risks posed by PFCAs. These actions include restrictions via Regulations, as such as the one proposed in the RM Scope and implemented in the amendment to the Prohibition of Certain Toxic Substances Regulations, 2005 adding controls for Four New Fluorotelomer-based Substances Regulations, as well as a voluntary instrument used for early action, namely the Environmental Performance Agreement on PFCAs. These actions, taken together, will address emissions of PFCAs from all sources.</p>

	<p>The risk management scope document should be strengthened to include the government's proposals to address waste disposal and recycling of products and waste stockpiles that contain long-chain PFCAs, their salts and their precursors. The absence of information about these sources should not be used as reason for inaction in the prohibition of these toxic substances.</p>	<p>The Government of Canada is developing risk management strategies for the waste sector (i.e., landfills, incinerators and recycling facilities) that will include PFCA-containing products and other toxics at end-of-life. As part of this work, the Government of Canada is collecting information on potential releases from waste management and recycling facilities in Canada. These substances will continue to be included in any monitoring from the waste sector.</p>
	<p>The government should investigate how investing in green chemistry is able to assist in identifying and implementing substitutes for toxic substances such as long-chain PFCAs, their salts and precursors.</p>	<p>The Government of Canada is supportive of the need for an orderly transition to safer products and technology and is working with various other jurisdictions, such as the United States and through the Organisation for Economic Co-operation and Development (OECD), to identify alternatives to toxic substances including PFCAs. Through the OECD, industry has identified that they are transitioning from PFOA and long-chain PFCAs to more sustainable alternatives chemistries such as short chain fluoroproducts that are generally equally efficacious and have improved environmental profiles</p>
	<p>An assessment of substitutes should be undertaken which should be hazard based rather than risk based to ensure that substitutes do not pose any harm to the environment or human health.</p>	<p>Consideration of substitutes for toxic substances is carried out as part of the development of risk management approaches. For alternative substances which are new to Canada, importers and manufacturers are subject to notification and assessment under the <i>New Substances Notification Regulations</i> under the <i>Canadian Environmental Protection Act, 1999</i>.</p>
	<p>It is important that the measures taken on PFOA seek the eventual elimination, phase out and prohibition of these substances because of their potential contribution to the formation of other perfluorinated acids such as long-chain PFCAs.</p>	<p>The Risk Management Scope and proposed controls addresses PFOA, their salts and precursors, and long-chain PFCAs, their salts and their precursors jointly as these substances are largely generated, used and emitted by the same industry sectors.</p>
	<p>The type of water treatment plants may influence the degradation process for the precursors for long-chain PFCAs. As such, treatment plants should not be considered effective control measures to prevent the formation of long-chain PFCAs. Rather, a preventative approach should be adopted in</p>	<p>The risk management objective for long-chain PFCAs, their salts and their precursors identified in the Risk Management Scope is the reduction of emissions from all sources. As emissions from all sources are reduced, quantities of PFCA precursors reaching Wastewater Treatment Plants (WWTPs) will therefore decrease.</p>

	consideration of measures to address long-chain PFCAs.	
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