



# Perfluorinated Chemicals

## OECD 2009 Survey Methodology

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## 2009 Survey

- The aim of the survey was to estimate the potential contributions to environmental loading of the targeted PFAS and PFCAs during manufacture and further processing
- Information requested from manufacturers of certain perfluorinated chemicals and/or products
- Focused on certain PFCs identified as being of potential concern
  - chain lengths of C6 and higher PFAS chemicals (including PFOS)
  - chain lengths of C8 and higher PFCAs (including PFOA)
  - Potential precursors of these chemicals
- No importation data sought to avoid double reporting and counting



# Survey Methodology

- Seventy three PFCs were identified for inclusion in the survey
- Questionnaire drafted by BIAC and industry members of the Group and finalised by the PFC Steering Group
- Australia took the lead in the conduct of the survey and preparation of the survey report



# Conduct of Survey

- The survey questionnaire was sent by Australia directly to the companies identified as manufacturers of the targeted substances
- BIAC identified the names and contact information of relevant companies
- Completed forms submitted by manufacturers directly to the lead country for analysis and development of survey report
- Lead country contacted manufacturers to clarify any responses that were not clear
- 3 months to respond to the survey



# Survey Questions

- Questions in the survey were designed to collect information and be able to estimate the environmental loading of the chemicals

## Information collected for 2008

- chemical name & CAS number
  - concentration in products
  - mass quantity in the products (residual)
  - use of the chemical/product
  - amount of substance released to air, water, land
  - amount transferred offsite – reason for transfer ie reuse, recycling or destruction by incineration
- Questionnaires and the list of chemicals sent to 27 companies identified as manufacturers in OECD and non-OECD countries



# Survey Questionnaire

To avoid ambiguity

- Definitions provided in the introduction to the survey of
  - PFOS, PFAS, PFOA and PFCA
  - “Perfluorochemical product” and “manufacturer”
- The introduction also clearly stated how CBI was to be provided



## Confidential Business Information (CBI)

- The OECD Steering Group recognised that some of the information relating to PFCs could be CBI
- For this to be achieved it was important to include as much information as possible in the survey report and at the same time maintaining confidentiality
- The Steering Group therefore clarified in the questionnaire the requirements for providing CBI while responding to the survey
- In addition a methodology was devised on how the information provided would be reported in the OECD report



## Treatment of CBI - Responders

- Manufacturers could claim data as CBI with a clear substantiation of the claim
- Request to limit CBI claims and provide as much information as possible
- Each page that contains CBI to be clearly marked “Confidential” indicating confidential nature of the information
- The precise information that is claimed as CBI on the page should be clearly marked
- Provide a second copy of the page removing all marked information and legends leaving only the non-confidential portions of the submissions
- In tables in the survey where both concentration and mass data were collected if a company is claiming confidentiality it was recommended that this apply to only concentration



# Reporting of Data

- Steering Group to protect CBI determined that the Rule of Three should be applied to processing and aggregating data in the survey report
- Aggregation of data should represent data input from at least 3 companies
- If less than 3 companies report data on a chemical then those data will not be reported publicly
- Rule of three to apply to each data element individually



## Conclusions

- The 2009 survey results are important as a starting point for future surveys
- Participation in future surveys by companies globally would generate valuable data for monitoring the production and release of targeted perfluorinated chemicals and provide an accurate picture of the global environmental loading of these chemicals
- The 2009 OECD survey report is available at <http://www.oecd.org/officialdocuments/displaydocumentpdf/?cote=env/jm/mono%282011%291&doclanguage=en>



## Improvements to Survey.....

Clarify better in the survey questionnaire

- Provision of information on uses– whether uses relate to the use of the chemical itself or to the formulated product
- groups the targeted substances fall into
- mass quantity of the substance – that it refers to the residual (unreacted) mass of the substance present in the product
- term “release” in the context of environmental loading eg should only releases to the environment be collected



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