

OECD Webinar on 2009 Perfluorinated Chemicals Survey Methodology: Manufacturer's Perspective

Dr. Stephen Korzeniowski, DuPont
on behalf of the FluoroCouncil

31 January 2012



FluoroCouncil
Global Industry Council
for FluoroTechnology

15:30 New Dehli; 21:00 Sydney; 11:00 CET Paris; 05:00 EST

Agenda

31 January
2012

- FluoroCouncil Introduction
- Manufacturer's Perspective
 - Before You Start
 - Complete the Survey
 - Survey Follow Up
 - Be Prepared
- Acceptable Terminology

About the FluoroCouncil

- The FluoroCouncil represents some of the world's leading fluoro-technology manufacturers
- Our membership includes companies that manufacture, formulate or process:
 - fluoropolymer products
 - fluorotelomer-based products
 - fluoro-surfactants
 - fluoro-surface property modification agents
- FluoroCouncil members are Arkema France, Asahi Glass Co., Ltd., Clariant International, Ltd., Daikin Industries, Ltd., DuPont Company, and Solvay Specialty Polymers

The survey is only as good as the data you supply, the effort you put into it, the robustness of the analyses, and the company and country participation rates.

Manufacturer's Perspective on OECD Survey

Before You Start –

- Completely understand what the survey is requesting and requiring
 - Can you and your company realistically fill out the survey in the time frame requested.
 - Can you generate the required data in the time frame specified.
 - Consider conducting an internal assessment on what your company will need to do to complete the survey
- Assign resources who are intimately familiar with the business details
 - Need production volumes, product impurity analyses, emissions analyses, analytical capability and limitations
- Develop a connection with the survey leader/sponsor (NICNAS/OECD) and open a dialogue pathway for questions and issues resolution.
- Understand what will be done with your company data after it is sent to the survey authority
 - Agree with the survey sponsor on a process for review of your company data in advance of distribution of a draft or final report to a broader audience
 - Work through potential issues ahead of time
- Fully understand, if needed, how your Confidential Business Information (CBI) data will be protected

Manufacturer's Perspective – Part II

Complete the Survey –

- Provide the data the survey is requesting
 - Insure timely reporting of general product market uses, specific chemical releases to the environment, specific impurities in products, and ultimate disposition of subject chemicals including recycle and incineration
- Keep the primary resources on the program until completed or your company will risk a potential disconnect that could have an adverse effect on data quality and timing
 - Primary resource needed for duration of preparation & review period. Effort will vary depending on complexity of company business (number of plants and products; extent of environmental emissions and analytical program capability) and how much advance preparation was done
 - Presumes company has emissions data and product impurity analyses already in hand prior to start of actual survey. Or data can be generated in short period of time
- Discuss issues as you go. Do not wait until the end and the report is completed. It is then too late to resolve what problems you had. This may require off-hours calls/meetings. They are worth it

Manufacturer's Perspective – Part III

Survey Follow-up –

- Obtain a copy of the sponsor's report on your company data to make sure the data was interpreted correctly and that your CBI, if any, was duly protected
 - Resolve your differences at this stage, prior to your company information being incorporated into the larger survey report
- Obtain a copy of the sponsor's full draft report with all company data and sponsor interpretations included
 - It is strongly recommended that this draft review step be incorporated into the process. If done correctly, there are likely to be fewer issues once the survey is issued to its member organization for review and approval
- Provide the sponsor with any suggestions to correct inaccuracies, clarify statements, provide references, or other recommendations to improve the report and its interpretations by readers
 - Work with the sponsor to come to a mutually acceptable position on issues that have been discussed

Manufacturer's Perspective – Part IV

Be Prepared To –

- Dedicate yourself to the task
- Commit to the time and effort needed to get the survey right
 - This can mean an hour one day and 8 the next. It will vary depending on issue complexity. Time flexibility is important
 - Overall this could be a one month or six month project (part-time) – it depends on business size, complexity and data and resources availability
- Be flexible and understanding of the various points of view on data interpretation you are likely to encounter
 - Help insure your information is portrayed appropriately (i.e. End Uses)
 - Compromise as needed
- Participate yourself and encourage your other country manufacturers to do the same

The survey is only as good as the data you supply, the effort you put into it, the robustness of the analysis, and the company and country participation rates

Terminology for Per- and Polyfluoroalkyl Substances

Perfluoroalkyl and Polyfluoroalkyl Substances in the Environment: Terminology, Classification, and Origins

Integrated Environmental Management and Assessment, 7(4), pp 513-541

<http://onlinelibrary.wiley.com/doi/10.1002/ieam.258/abstract>

Long-Chain and Short-Chain Definitions

www.oecd.org/ehs/pfc

Thank You
Questions and Discussion