

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: 18 November 2021 15:17
To: [REDACTED]
Cc: [REDACTED]
Subject: Sv: Precursor/degradation PFAS modeling

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Dear [REDACTED] and [REDACTED]

Thank you for the clarifications and sorry if my questions led to any confusions! I have not been involved in the development of these different document versions but now I understand what has been done. And I will definitely make use of the parts from ECHAs original document concerning degradation of precursors.

Best regards,
[REDACTED]

[REDACTED]
Chemist, PhD
Development/Proposals for Classification and Restriction
Swedish Chemicals Agency
Direct: [REDACTED]
Tel: [REDACTED]
www.kemikalieinspektionen.se
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Från: [REDACTED] <[REDACTED]>
Skickat: den 18 november 2021 13:57
Till: [REDACTED] <[REDACTED]>
[REDACTED]
Kopia: [REDACTED] <[REDACTED]>
Ämne: SV: Precursor/degradation PFAS modeling

Hello,

We looked into how we can explain that the various PFAS arrowhead groups are persistent as this matched with some previous assessments we have done (e.g. PFBS). And we supported this with QSAR modelling data to show that the selected subgroups are not expected to degrade in the environment. We copy/pasted the parts in the initial ECHA document that supported the description of persistence. Due to capacity limitations we have not taken on the description of degradation of precursors to the different arrowhead groups. But it would for sure be natural to include the relevant parts of the ECHA document in such an assessment. That is obviously also the reason why we suggested to look into this document at this stage.

Kind regards,

Fra: [REDACTED] <[REDACTED]>
Sendt: torsdag 18. november 2021 09:27
Til: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
Kopi: [REDACTED] <[REDACTED]>
Emne: RE: Precursor/degradation PFAS modeling

Hi [REDACTED]

The one you attached is the initial ECHA document. Maybe [REDACTED] can explain why the degradation of related substances -passages were deleted. But good that you point out that the info is not in the current versions. We can consider later on what we put in.

The question about what we include and exclude is about the balance of how much evidence in total we need to put in, as we are trying a top-down approach, not to provide information on all substances within the scope.

What floats in my mind as a "small effort top -down approach" for the evidence that related substances degrade into more persistent substances is to provide evidence/describe that the other moieties of a precursor -PFAS are targeted first in the degradation processes before the C-F bonds. This can be done in several ways but does not need to be very exhaustive I think.

Generally classical substances, for which a persistence assessment is carried out, tend to degrade into degradation products which are more bioavailable and hence more available at least for biodegradation than the parent. (this may sometimes exclude first transformation steps but for a proper degradation this phenomenon normally holds). In the UPFAS hazard assessment we state the contrary, because the actual perfluorinated moiety remaining is the most stable one. This statement needs some evidence to the dossier so that we can make that generalised statement.

Hope this helps a bit ...and sorry [REDACTED] if this comes too much from the side as you have anyways discussed this in the UPFAS group more..

BR,

From: [REDACTED] <[REDACTED]>
Sent: 16 November 2021 17:37
To: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
Subject: Sv: Precursor/degradation PFAS modeling

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Dear [REDACTED] and [REDACTED]

Thank you for the provided precursor degradation study done by ECHA!

I have a follow-up question to [REDACTED] In a previous preliminary version of the Annex XV restriction report for the fire fighting foams, there were sections concerning degradation of PFSA precursors, PFCA precursors, PFESA precursors and PFESA precursors into the corresponding arrowheads (see attached document, sections B.4.1.7 – B.4.1.9). Why are these sections not included in the latest version of the restriction report (AFFF_Annex XV_ENV_HAZ_working version_5.0_04-11-2021_NL)?

I have got the task to extract relevant information from previous PFAS dossiers concerning degradation of PFAA precursors and merge them into the Annex XV restriction report. And parts of the sections that were included in the previous version of the FFF-dossier could be used for this purpose (although we have decided not to rely on the CATALOGIC data, but rather on literature data).

Best regards,

[REDACTED]

[REDACTED]
Chemist, PhD
Development/Proposals for Classification and Restriction
Swedish Chemicals Agency

Direct: [REDACTED]
Tel: [REDACTED]
www.kemikalieinspektionen.se

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Från: [REDACTED] <[REDACTED]>

Skickat: den 16 november 2021 15:57

Till: [REDACTED] <[REDACTED]>

Kopia: [REDACTED] <[REDACTED]>

Ämne: VS: Precursor/degradation PFAS modeling

Dear [REDACTED]

Attached you can find the precursor degradation study that ECHA performed a while ago. I struggled a bit with remembering exactly what I was looking for, but with [REDACTED] help I was able to sort my thinking and found this email from August.

Kind regards,

[REDACTED]

Fra: [REDACTED] <[REDACTED]>

Sendt: fredag 27. august 2021 12:52

Til: [REDACTED] <[REDACTED]>

Emne: Precursor/degradation PFAS modeling

Hi [REDACTED]

Attached you find the document in referred to. Extracts of it have been directly used in couple of the earlier PFAS restriction proposals in the Annex XV reports. The work was carried out by [REDACTED] supported by the team of

[REDACTED] The report is not published, therefore better to use directly extracts of it (or you can make a summary as if you would have carried out the work) where needed.

This was circulated (much) earlier to the PFAS working group, so you might find it familiar after all =)

You can upload this to the S-circabc, if needed.

BR,

[REDACTED]