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01/22/2007 01:23 PM

To Philippe Hoff/BE-Europe/3M/US@3M-Corporate

cc Dale L. Bacon/US-Corporate/3M/US@3M-Corporate  
John L. Butenhoff/US-Corporate/3M/US@3M-Corporate

bcc

Subject Re: Fw: Considerations for conducting a PFOA avian repro study

Philippe, overall I am fine with the arguments you have raised. The only one that I question is the one in your earlier note: "possibility of finding repro effects when conducting such a study." Is this what you mean, or is it that any reproductive effects would be a result of captivity, that is not related to the compound. I think this phrase needs to be reworded to capture the point.

We can discuss briefly later this morning during our conference call.

Thanks,  
Mike

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Philippe Hoff/BE-Europe/3M/US

Philippe  
Hoff/BE-Europe/3M/US

01/15/2007 03:40 AM

To Michael A. Santoro/US-Corporate/3M/US@3M-Corporate  
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cc

Subject Fw: Considerations for conducting a PFOA avian repro study

Mike, Dale, John,

Thank you for your input on the PlasticsEurope group suggestions to conduct a PFOA bird reproduction study. May I ask you for your final OK on the argumentation below so that I can share these arguments in writing with the PlasticsEurope group. Based on our conf call of 12 Jan, I noted as arguments in addition to the ones mentioned in my note below, that:

- it would make more sense to complete the PFOA data package on acute toxicity data first before embarking on such a repro study.
- there are ethical concerns linked to testing on vertebrates.



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I will add these additional arguments to the ones I have shared with you in my note below.

Best regards,

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----- Forwarded by Philippe Hoff/BE-Europe/3M/US on 15/01/2007 10:34 -----

Philippe  
Hoff/BE-Europe/3M/US  
23/11/2006 10:35

To Michael A. Santoro/US-Corporate/3M/US  
Dietrich Sinnaeve/BE-Europe/3M/US  
John L. Butenhoff/US-Corporate/3M/US  
Dale L. Bacon/US-Corporate/3M/US

cc

Subject Considerations for conducting a PFOA avian repro study

The attached draft document contains pro/con arguments for conducting a PFOA avian reproduction study. The intent is to distribute this document among the PlasticsEurope APFO ad hoc tox group members so that a group decision can be made on whether to conduct such a study or not. I have discussed this to some extent with John and Dale. I felt that it was better not to present the considerations to the group as pro/cons. I also believe that some additional arguments could be added but these should probably not be in such a written document. I am thinking in particular about the following:

- high cost of bird repro study
- possibility of finding repro effects when conducting such a study
- unfavourable political climate around perfluorochemicals in general so that the impact of a bird repro study with favourable outcome won't probably have a big impact
- political pressure on PFOA will most probably lead to PFOA as a "substance of equivalent concern" for authorisation under REACH, irrespective of the availability of a PFOA bird repro study with a favourable outcome. Now that it seems that only the "PT" part of "PBT" will be considered to be met by PFOA the pressure to have PFOA as a "substance of equivalent concern" is even higher.
- no particular concern of authorities about bird APFO repro effects
- bird repro studies are not by default required under existing chemical legislation applicable to PFOA and won't by default be required under REACH.

Comments are welcome.

[attachment "considerations on conducting a PFOA avian repro study.doc" deleted by Michael A. Santoro/US-Corporate/3M/US]

Best regards,

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