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

Best regards,

Philippe HOFF
3M Europe&MEA EHS&R Specialist
Hermeslaan 7
B-1831 Diegem
Belgium
Tel: +32 272 248 70
Triminet: 832 248 70
Mobile: +32 478 881 832
Fax: +32 272 245 14
E-mail: phoff@mmm.com

--- 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 PFO repro effects
- bird repro studies are not be 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,

Philippe HOFF
3M Europe&MEA EHS&R Specialist