



Rt Hon Michael Gove MP  
Secretary of State for the Environment, Food and Rural Affairs  
Nobel House 17 Smith Square London SW1P3JR

17<sup>th</sup> June 2019

## Supporting the upcoming identification of the persistent and mobile chemical HFPO-DA (used in 'GenX') as a substance of very high concern under REACH

Dear Secretary of State,

I am writing to you on behalf of CHEM Trust, an environmental NGO which focuses on chemicals policy and human health. I am contacting you ahead of the Member State Committee meeting at the EU Chemicals Agency from 24 – 27 of June 2019, that will discuss the identification of three newly nominated chemicals as Substance of Very High Concern (SVHC) for the EU's main chemicals law REACH. SVHC chemicals are those with the most problematic hazards, and such a designation is the first step in increasing the controls on such chemicals.

We would particularly like to bring your attention to the case of the substance 2,3,3,3-tetrafluoro-2-(heptafluoropropoxy)propionic acid (HFPO-DA). CHEM Trust has supported the identification of this substance as a SVHC during the public consultation phase as we are very concerned about the exposure of humans and wildlife to these problem chemicals.

HFPO-DA is a member of a larger group of PFAS (per- and polyfluoroalkylated substances), made up of more than 4,000 different chemicals<sup>1</sup> which are ubiquitous in the environment and have been found in the blood of people all around the world<sup>2</sup>. Several PFAS are already listed as a SVHC and PFOS and PFOA are subject to a global ban through the Stockholm Convention regulating Persistent Organic Pollutants (POPs)<sup>3</sup>. HFPO-DA has been developed in particular as a substitute to PFOA as a processing aid in the so-called 'GenX' technology.

I am writing to you to ask that the UK Government supports the identification of HFPO-DA as a SVHC for the following reasons, based on the scientific evidence presented:

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<sup>1</sup> Toward a new comprehensive global database of per- and polyfluoroalkyl substances (PFASs). [OECD, 2018](#).

<sup>2</sup> Synthesis paper on per- and polyfluorinated chemicals (PFCs). [OECD/UNEP, 2013](#).

<sup>3</sup> <http://www.pops.int/>

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- **HFPO-DA is very persistent.** Scientists have argued for decades that high persistence in itself is a major concern as highly persistent chemicals accumulate in the global environment and have the potential to reach critical concentrations at which negative unexpected effects can be triggered<sup>4</sup> - and by this point there is no way of removing the contaminant from the environment.
- **HFPO-DA is very mobile.** It has been found in drinking water and surface water in several places in Europe, including the UK<sup>5</sup> and is not removed efficiently in water treatment works. We are very concerned that environmental pollution with HFPO-DA has developed over just a few years (2012-2018) since the start of using these compounds in Europe. The increased exposure via water mobility should be considered of equivalent concern to bioaccumulation<sup>6</sup>.
- **The high persistence of HFPO-DA combined with its high mobility means that potential impacts will continue even after cessation of emissions**, thus presenting a threat to future generations.

Taken together with the evidence of adverse effects on human health outlined in the HFPO-DA dossier, the potential for long-range transport and the fact that structurally similar perfluorinated substances have already been included as PBT or vPvB chemicals in the REACH candidate list, we consider that this substance is clearly a SVHC according to REACH Article 57 f.

We consider that it is vital that this chemical is identified as a SVHC as fast as possible, to create a clear signal to companies around the world that they should stop using it. Urgent action is required to prevent further accumulation of this substance in the environment, and designation as a SVHC is just the first stage in this process.

Thank you for considering your support in this important matter to help reduce the contamination of current and future generations. We remain at your disposal for any further questions.

We look forward to hearing from you about whether the UK supports this listing and also about the outcome of the meeting in June.

Yours sincerely,



Dr Michael Warhurst  
Executive Director  
CHEM Trust

*In view of the public interest in this matter, we intend to make this letter publicly available.*

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<sup>4</sup> Cousins et al., 2019. Why is high persistence alone a major cause of concern? Environmental Science: Processes & Impacts, 21, 781-792. <https://doi.org/10.1039/C8EM00515J>

<sup>5</sup> Pan, Y., et al., 2018. Worldwide distribution of novel perfluoroether carboxylic and sulfonic acids in surface water. Environmental science & technology, 52(14), pp.7621-7629. <https://doi.org/10.1021/acs.est.8b00829>

<sup>6</sup> Reemtsma, et al., 2016. Mind the Gap: Persistent and Mobile Organic Compounds – Water Contaminants that Slip Through. Environ. Sci. Technol., 50, pp. 10308-10315. <http://doi.org/10.1021/acs.est.6b03338>