Long-chain perfluorocarboxylic acids (PFCAs), their salts and related compounds

RISK PROFILE

Prepared by the intersessional working group of the Persistent Organic Pollutants Review Committee

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Executive summary

1. The Persistent Organic Pollutants Review Committee (POPRC) at its seventeenth meeting concluded that long-chain perfluorocarboxylic acids (PFCAs), their salts and related compounds fulfilled the screening criteria in Annex D (decision POPRC-17/6). This risk profile concerns the PFCAs with carbon chain lengths from 9 to 21 inclusive (hereafter referred to as C9 – C21 PFCAs), their salts and related compounds. Long-chain PFCAs and their salts are a homologous series of substances with the molecular formula of $C_nF_{2n+1}CO_2H$ (where $8 \le n \le 20$). Compounds related to long-chain PFCAs are defined as any substance that is a precursor and may degrade or transform to long-chain PFCAs, where the perfluorinated alkyl moiety has the formula C_nF_{2n+1} (where $8 \le n \le 20$) and is directly bonded to any chemical moiety other than a fluorine, chlorine or bromine atom.

2. Long-chain PFCAs, their salts and related compounds are used, or may have been used, in a range of applications, including in industrial applications (e.g. as surfactants, and in the production of fluoropolymers); electronics, medical devices, printing inks and photographic materials; automotive care products; building and construction materials; cookware and food-contact materials; fire-fighting foam; ski waxes; and various consumers products (such as household products, personal care products, home textiles and apparel). In addition, long-chain PFCAs and their related compounds may be unintentionally produced during the manufacturing of per- and polyfluoroalkyl substances (PFAS).

3. Information in the public domain on the historic and current production of long-chain PFCAs, their salts and related compounds is limited, and estimated volumes vary in the literature. Estimates of the global production of the ammonium salt of C9 PFCA (ammonium perfluorononanoate or APFN) have been reported to be in the range of 15 to 100 tonnes/year for the period between 1975 and 2004. The usage of APFN in Japan, Western Europe and the United States of America (USA) has been estimated to range between 8 and 107 tonnes/year for the years 1975 to 2015. Worldwide production of fluorotelomers (compounds related to LC-PFCAs) was estimated at approximately 9100 tonnes in 2006. Another source estimated the global annual production of fluorotelomer-based products to range between 2500 and 20 000 tonnes for the years 1961 to 2004, and at 45 000 tonnes/year for the period 2005 to 2030. A geographical shift of industrial sources of PFCAs (particularly fluoropolymer production sites) from the USA, Western Europe and Japan to emerging Asian economies, especially China, has been reported in the literature.

4. Long-chain PFCAs are released to the environment from direct and indirect sources. Direct sources include emissions from the production of PFCAs, as well as during the life cycle of products containing long-chain PFCAs. Indirect sources are those where compounds related to the long-chain PFCAs emitted to the environment have degraded to long-chain PFCAs through biotic or abiotic degradation. Release of long-chain PFCAs, their salts and related compounds to the environment is documented by their detection in environmental matrices collected in proximity to production facilities and industrial areas; sites impacted by aqueous film-forming foam; wastewater, sludge and leachate from waste treatment facilities; agricultural sites with a history of application of biosolids; snow and soil from skiing areas; and indoor environments.

5. Long-chain PFCAs, which are carboxylic acids bonded to a fully fluorinated carbon chain, are persistent in the environment. The carbon-fluorine bond is one of the strongest covalent bonds (about 108 – 120 kcal/mole), making the bond extremely stable and generally resistant to degradation by acids, bases, oxidants, reductants, photolytic processes, microbes and metabolic processes. The strong carbon-fluorine bond and high density of electron-rich repellent fluorine atoms protect the carbon backbone and result in inertness to both heat and chemical reagents. A number of studies demonstrate that long-chain PFCAs do not degrade under environmentally relevant conditions. For example, C9 PFCA did not biodegrade under the Organisation for Economic Co-operation and Development (OECD) 301F method. Other studies demonstrate some degradation of long-chain PFCAs, but not under environmentally relevant conditions.

6. Some measured bioconcentration factors and bioaccumulation factors greater than 5000 have been reported for C9 – C14 PFCAs in freshwater and marine aquatic organisms. Trophic magnification factors and biomagnification factors greater than 1 have been reported for C9 – C16 PFCAs in studies that focused on top predator species, such as birds and terrestrial/marine mammals, providing evidence that long-chain PFCAs biomagnify in air-breathing organisms. Although there are no biomagnification or trophic magnification data for long-chain PFCAs with chain lengths greater than C16, PFCAs up to C18 have been measured in top predator species, such as polar bears, herring gulls and peregrine falcons. In humans, long-chain PFCAs accumulate in the blood and well perfused tissues, such as the liver and kidneys, and are eliminated very slowly from the body. The mean elimination half-lives for C9 PFCA are estimated to range from 2.5 to 4.3 years in humans, whereas the mean half-lives for both C10 and C11 PFCA range from 4.5 to 12 years. Using a read-across approach on the basis of the high degree of chemical similarity for the series of acids, it is reasonable to expect that long-chain PFCAs of up to 21 carbons have the potential to bioaccumulate in aquatic and terrestrial organisms, and in humans.

7. Global modelling indicates that long-chain PFCAs, their salts and/or related compounds have the potential to be transported over long distances. In addition, C9 – C18 PFCAs have been measured in environmental media biota and human populations from remote sites, such as the Arctic and the Antarctic, indicating that long-chain PFCAs have the potential for long-range environmental transport. Furthermore, increasing temporal concentration trends in polar bears from remote regions have been reported. Compounds related to long-chain PFCAs have also been measured in ambient air from various regions around the world, including in remote areas. Available research indicates that the presence of long-chain PFCAs in remote areas results from the atmospheric and oceanic transport of volatile precursors and/or the acids themselves. There is empirical evidence of the presence of long-chain PFCAs of up to 21 carbons may be expected to be present in remote environments as a result of the release of compounds related to long-chain PFCAs during their production and use in many applications, and the potential for these precursors to undergo long-range environmental transport.

8. Long-chain PFCAs have been detected globally, in all continents as well as in all environmental compartments, including biota, freshwater and saltwater, sediment, soil and rainwater. Increasing temporal trends for long-chain PFCAs (up to C15 PFCA) have been reported in wildlife, including in top predator species. In humans, C9 – C18 PFCAs have been detected globally in various tissues and fluids. Exposure of the general population to long-chain PFCAs and their related products may take place through exposure to indoor dust, food, drinking water, indoor/outdoor air and consumer products; however, the relative importance of each of these pathways for the general population remains unclear. Maternal transfer through cord blood and breastfeeding are sources of long-chain PFCAs for the fetus and for nursing infants/children. Occupational exposure to certain workers (e.g. firefighters, ski wax technicians) can lead to higher serum levels of long-chain PFCAs.

Laboratory studies of ecological endpoints demonstrated developmental effects, behavioural 9 effects, hepatotoxicity, immunotoxicity, neurotoxicity, changes in gene expression, genotoxicity and altered thyroid hormones. In addition, vitellogenin induction has occurred in juvenile rainbow trout after dietary exposure to C9 - C11 PFCAs. Toxicological and epidemiological evidence indicates that long-chain PFCAs are associated with adverse effects in humans, including hepatotoxicity, developmental/reproductive toxicity, immunotoxicity and thyroid toxicity. Data on the adverse effects of long-chain PFCAs is generally lacking for PFCAs with longer chain lengths (e.g., C15, C17 and C19 - C21). However, read-across can be used to fill data gaps, particularly within a homologous series of substances. Long-chain PFCAs have a high degree of chemical similarity for the series of acids and existing data show effects on common endpoints. Data from homologues, including the extensively studied C8 PFCA (perfluorooctanoic acid, PFOA) which has been listed to Annex A of the Stockholm Convention, indicates the potential for adverse effects. Furthermore, several studies show that the activity/toxicity of PFCAs can increase with chain length. Therefore, it is expected that all long-chain PFCAs would have similar adverse effects on human health and the environment, although the toxic potency may vary with chain length.

10. Long-chain PFCAs are persistent and remain in the environment for a very long time, which increases their probability, magnitude and duration of exposure to wildlife. Long-chain PFCAs are also subject to long-range transport, which can also result in regional and global contamination. As such, releases of long-chain PFCAs can lead to elevated concentrations in organisms over wide areas. Long-chain PFCAs may also biomagnify through the food chain, resulting in increased concentrations in top predator species. Since they are widespread, several different long-chain PFCAs can be present simultaneously in the tissues of organisms, increasing the likelihood and potential severity of harm. Increasing temporal concentration trends in wildlife, including top predator species, suggest that long-chain PFCAs can approach toxicity thresholds resulting in harm for wildlife populations in the future. In humans, the reported temporal concentration trends for the long-chain PFCAs have been inconsistent. However, concentrations of certain long-chain PFCAs have been reported to have increased in Canadian Nunavik pregnant women between 2011 and 2016-2017, while levels of these PFCAs were declining or stable in the general Canadian population. This suggests that certain populations are at risk of greater exposure to long-chain PFCAs.

11. Due to the ongoing use of long-chain PFCAs, their salts and related compounds, long-chain PFCAs are directly or indirectly emitted into the environment from human activities. Long-chain PFCAs are globally ubiquitous in environmental compartments, including biota, freshwater and saltwater, sediment, soil and rainwater, and humans globally. Long-chain PFCAs are persistent, bioaccumulative, have evidence of adverse effects to human health and/or the environment, and have

the potential to undergo long-range environmental transport, in part due to the long-range atmospheric transport of compounds related to long-chain PFCAs. Therefore, it is concluded that long-chain PFCAs, their salts and related compounds are likely, as a result of their long-range environmental transport, to lead to adverse human health and/or environmental effects such that global action is warranted.

1. Introduction

12. In June 2021, Canada submitted a proposal to list long-chain (C9 - C21) perfluorocarboxylic acids (PFCAs), their salts and related compounds in Annexes A, B and/or C to the Convention. The proposal (UNEP/POPS/POPRC.17/7) was submitted in accordance with Article 8 of the Convention, and reviewed by the POPs Review Committee (POPRC) at its seventeenth meeting in January 2022.

Certain data gaps were noted for some members of the homologous series of long-chain 13. PFCAs covered in this risk profile, most notably for biomagnification studies in the field and monitoring data for C19 – C21 PFCAs. This may be the consequence of analytical challenges in measuring PFCAs at the upper end of the range (i.e. for C15 - C21 PFCAs). Typical analysis (including standardized methods) for measuring PFCAs is by liquid chromatography-tandem mass spectrometry (LC-MS/MS) using electrospray ionization. Studies, such as Androulakakis et al. 2022 and Gao et al. 2016, have shown that the instrument response decreases significantly for \geq C14 PFCAs due to poor ionization efficiency. This is further demonstrated by standards for C14 - C18 PFCAs. As a result, accredited analysis from commercial laboratories is restricted to C9 - C14 PFCAs, which may limit the availability of data for C15 - C21 PFCAs. Authentic reference standard mixtures of PFAS are widely employed in analytical methodology and the majority of these do not include >C14 PFCAs (e.g. PFAC-MXH, EU-5813-NSS, EPA-533PAR, PFAC30PAR, PFC-MXA, PFAC-MXA, PFAC-24PAR, EPA-537PDS) (US EPA 2019, 2021a; Shoemaker et al. 2008; Wellington Laboratories 2022). These reference standards are commercially-available mixes designed to support standardized methods by the United States Environmental Agency (US EPA) and European Union Council Directive. Gaps in data for the longer-chain PFCAs may also be a result of the lower environmental loading of the longer-chain PFCAs, relative to those on the shorter end of the range. Nonetheless, the estimated worldwide production volumes of compounds related to long-chain PFCAs suggest that the environmental loading for PFCAs at the upper end of the range is significant (refer to section 2.1 for more details). Similarly, adverse effects data have largely focused on the shorter members of this homologous series.

14. To address data limitations, a read-across approach has been implemented in this document based on guidance on grouping of chemicals from the Organisation for Economic Co-operation and Development (OECD 2014). According to this guidance, substances that have physicochemical, toxicological and ecotoxicological properties that are likely to be similar or follow a regular pattern as a result of structural similarity may be considered as appropriate for read-across. It is appropriate to take such an approach as the long-chain PFCAs are a homologous series of substances, with total carbon atoms ranging from 9 to 21. There is a high degree of chemical similarity. Each acid contains the same overall structure, with a terminal carboxylic acid and an incremental and constant change of one additional --CF₂. throughout the series. This series can result from a common manufacturing method of telomerization (Buck et al. 2011) forming related compounds. These in turn are subject to common biotic and abiotic transformation mechanisms, to produce the acids (Butt et al., 2013; Ellis et al. 2004). A read-across is justified and has been adopted in certain portions of the document where data is lacking for specific long-chain PFCAs. While the information provided forms the basis of the justification for the use of read-across information, endpoint-specific considerations are reported in the appropriate sections of this document.

1.1 Chemical Identity

15. Long-chain PFCAs, their salts and related compounds are members of the per- and polyfluoroalkyl substances (PFAS) chemical class. The compounds included in the nomination of long-chain PFCAs, their salts and related compounds were defined in document UNEP/POPS/POPRC.17/7 and in decision POPRC-17/6 (UNEP/POPS/POPRC.17/13).

16. In line with decision POPRC-17/6, this risk profile concerns the PFCAs with carbon chain lengths from 9 to 21 inclusive, their salts and related compounds. Long-chain PFCAs and their salts are a homologous series of substances with the molecular formula of $C_nF_{2n+1}CO_2H$ (where $8 \le n \le 20$). Compounds related to long-chain PFCAs are defined as any substance that is a precursor and may degrade or transform to long-chain PFCAs, where the perfluorinated alkyl moiety has the formula C_nF_{2n+1} (where $8 \le n \le 20$) and is directly bonded to any chemical moiety other than a fluorine, chlorine or bromine atom. A non-exhaustive list of Chemical Abstracts Service (CAS) numbers for

long-chain PFCAs, their salts and related compounds is provided in UNEP/POPS/POPRC.18/INF/y.

17. The chemical identity of the long-chain PFCAs and the available experimental and calculated physical and chemical data for this group are given in Tables 1 and 2 of UNEP/POPS/POPRC.17/7. Information relating to the physicochemical properties is reported for C9 - C15 chain lengths.

18. Both linear and branched isomers are encompassed by the scope of the risk profile. Linear isomers appear to be predominant for long-chain PFCAs detected in biota as they may have significantly slower elimination rates and/or may be present at higher exposure concentrations than branched isomers (Conder et al. 2008).

19. Related compounds to long-chain PFCAs include fluorotelomer alcohols (FTOHs) and fluorotelomer derivatives, including side-chain fluorinated polymers and polyfluoroalkyl phosphoric acid mono-/diesters (monoPAPs/diPAPs). Fluorotelomers are a subgroup of per- and polyfluorinated substances that are produced by a process called telomerization, which can produce a range of fluorocarbon chain lengths. FTOHs are not fully fluorinated, since they have a two or more hydrocarbon alkyl chains linked to the perfluorinated carbon chain (Environment Canada 2012). FTOHs with x number of perfluorinated carbons produce intermediates such as fluorotelomer unsaturated carboxylates (x:2 FTUCA) and fluorotelomer carboxylic acids (x:2 FTCA) that can further degrade to long-chain PFCAs (Environment Canada 2012). FTOHs, which are volatile, can also undergo atmospheric oxidation to yield long-chain PFCAs (Wallington et al. 2006). Substances containing $F(CF_2)_n(CH_2)_2$. groups can also be considered potentially related compounds to long-chain PFCAs, as they will likely result in the release of x:2 FTOHs in the environment (ECHA 2018a,b).

1.2 Conclusion of the POPs Review Committee regarding Annex D information

20. At its seventeenth meeting, the POPs Review Committee evaluated the proposal by Canada to list long-chain PFCAs, their salts and related compounds under the Convention. The committee concluded that long-chain PFCAs, their salts and related compounds meet the screening criteria specified in Annex D (decision POPRC-17/6). It was decided to review the proposal further and to prepare a draft risk profile in accordance with Annex E to the Convention.

1.3 Data sources

21. The draft risk profile is based on the following data sources:

(a) The proposal to list long-chain PFCAs, their salts and related compounds submitted by Canada (UNEP/POPS/POPRC.17/7);

(b) Information submitted by the following Parties and observers according to Annex E to the Convention: Austria, Belarus, Germany, Monaco, New Zealand, Norway, the Republic of Korea, Sweden, the United Kingdom of Great Britain and Northern Ireland, the United States of America (USA), the International Pollutants Elimination Network (IPEN) and Alaska Community Action on Toxics (ACAT), and Imaging and Printing Association Europe (I&P Europe);

(c) Ecological Screening Assessment Report Long-Chain Perfluorocarboxylic Acids, their Salts and their Precursors prepared by Environment Canada (Environment Canada 2012);

(d) Opinions and related background document from the ECHA Committee for Risk Assessment and Committee for Socio-economic Analysis on an Annex XV dossier proposing restrictions on PFNA, PFDA, PFUnDA, PFDoDA, PFTrDA, PFTDA; their salts and precursors (ECHA 2018a,b, 2020);

(e) Tier II human health and environmental assessments of indirect precursors to longchain PFCAs from the Australian National Industrial Chemicals Notification and Assessment Scheme (NICNAS 2017, 2019).

(f) Peer-reviewed scientific journals, as well as information from reports and other grey literature.

1.4 Status of the chemical under national regulations

22. In Canada, an ecological risk assessment concluded that long-chain PFCAs, their salts and their precursors are entering or may enter the environment in a quantity or concentration or under conditions that have or may have an immediate or long-term harmful effect on the environment or its biological diversity (Environment Canada 2012). Consequently, long-chain PFCAs, their salts and their precursors were listed to Schedule 1 – List of Toxic Substances of the *Canadian Environmental Protection Act*, 1999 (CEPA). Since 2016, the *Prohibition of Certain Toxic Substances Regulations, 2012* (Canada 2012) have prohibited the manufacture, use, sale, offer for sale or import of long-chain

PFCAs, their salts and their precursors, and products containing them, with a limited number of exemptions. A consultation document, proposing regulatory amendments to these Regulations to further restrict long-chain PFCAs their salts and their precursors in Canada, was published in December 2018 (Canada 2018). The publication of the proposed regulatory amendments is anticipated to take place in 2022.

23. In 2009, the US EPA published an Action Plan for addressing potential concerns with longchain perfluorinated chemicals, including long-chain PFCAs, and identified long-chain PFCAs as persistent, bioaccumulative and toxic (PBT) (US EPA 2009). In July 2020, the US EPA released its final rule regarding a Significant New Use Rule (SNUR) under the Toxic Substances Control Act for long-chain perfluoroalkyl carboxylate (PFAC) and perfluoroalkyl sulfonate chemical substances. The term long-chain PFAC refers to the long-chain category of perfluoroalkyl carboxylate chemical substances with perfluorinated carbon chain lengthswhere $7 \le n \le 20$. The final rule amends previous SNURs for these substances, and requires manufacturers or importers of long-chain PFAC chemical substances, their salts and precursors to notify the US EPA before conducting certain activities (US EPA 2020). In October 2021, the US EPA published the PFAS Strategic Roadmap, which lays out the Agency's approach to addressing PFAS and set timelines for taking actions (US EPA 2021b).

24. In Australia, NICNAS (now the Australian Industrial Chemicals Introduction Scheme, AICIS) has developed an action plan to assess and manage chemicals that may degrade to PFCAs, perfluoroalkyl sulfonates and similar chemicals (NICNAS 2020), and published tier II human health and environmental risk assessments of precursors to long-chain PFCAs (NICNAS 2017, 2019). The precursors in this group were assessed as having the potential to cause adverse outcomes for the environment and human health. Consequently, it was recommended that NICNAS consult with industry and other stakeholders to consider strategies, including regulatory mechanisms available under the *Industrial Chemicals (Notification and Assessment) Act 1989*, to encourage the use of safer chemistry.

25. In Norway, long-chain PFCAs (C9 - C14) were included on the national priority list in 2014 with the objective that emission and use of these hazardous substances must be eliminated (Annex E information 2022).

26. In the EU, C9 and C10 PFCAs and their salts are classified¹ according to the globally Harmonized System (GHS) criteria provided under Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures (ECHA 2018b). In addition, six long-chain PFCAs and their salts were identified as Substances of Very High Concern (SVHC) and added to the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Candidate List, as they were identified as PBT and toxic for reproduction (C9 and C10 PFCAs), or very persistent and very bioaccumulative (vPvB) (C11 – C14 PFCAs) (ECHA 2018b). In August 2021, the European Commission published a Regulation (2021/1297) to restrict C9 – C14 PFCAs, their salts and related compounds under REACH, which will come into force in February 2023 (European Commission 2021).

2. Summary of the information relevant to the risk profile

2.1 Sources

2.1.1 Production, trade, stockpiles

27. Estimates of the global production and consumption of long-chain PFCAs, their salts and related compounds have been reported in the literature. Worldwide total manufacturing volumes of ammonium salt of C9 PFCA (ammonium perfluorononanoate or APFN) for the production of primarily polyvinylidene fluoride (PVDF) for the years 1975 to 2004 was estimated to be in the range of 800 to 2300 tonnes (with production estimated to be in the range of 15 to 100 tonnes/year) (Prevedourous et al. 2006). For the year 2004, APFN volumes were estimated to range between 15 and 75 tonnes (PERFORCE 2004; Posner et al. 2009). Wang et al. (2014) estimated the APFN usage in Japan, Western Europe and the USA to range between 8 and 107 tonnes per year for the years 1975 to 2015. For the period of 2016-2030, the authors' assumption was that the use of APFN in PVDF production, and associated production of APFN in those countries, would cease as the major

¹ C9 and C10 PFCAs and their salts are classified under the GHS for their carcinogenic potential (Carc. 2: Suspected of causing cancer), reproductive toxicity (Repr. 1B: Adverse effects on sexual function and fertility or on development) and effects on or via lactation. C9 PFCA is also classified for its acute toxicity (Category 4), toxicity on the liver, thymus, and spleen (STOT RE 1: Specific target organ toxicity – repeat exposure) and eye damage (Category 1).

manufacturing companies committed to the US EPA Stewardship program.

28. In response to a survey conducted by the OECD for the year 2009 (OECD 2011), four companies in two countries² reported manufacture of long-chain PFCAs, their salts and related compounds, with perfluorinated chain lengths of 9 to 18 carbons. Twenty-three long-chain PFCAs (C9 – C12), their salts and related compounds, including 10:2 - 18:2 fluorotelomers, were reportedly contained in products or mixtures, whether as part of the formulation or as residue (impurity). The total volume of these substances in products was approximately 16 tonnes. The majority of the substances were reported to have uses as raw materials (for surface treatment agents, water/oil repellents and soil repellents), fluoropolymer polymerisation aids or manufacturing intermediates (OECD 2011).

29. Worldwide production of fluorotelomers was estimated at approximately 9100 tonnes (reported as 20 million pounds) in 2006 and, at that time, the USA was considered to account for more than 50 percent of the production (US EPA 2009). Textiles and apparel were considered to account for approximately 50 percent of the volume, with carpet and carpet care products accounting for the next largest share in consumer product uses. Coatings, including those for paper products, were identified as the third largest category of consumer product uses (US EPA 2009). For the years 2012 to 2015, annual national aggregate production volumes of < 454 tonnes were reported in the USA for each of the following FTOHs (8:2, 10:2, 12:2 and 14:2) (CDR 2020).

30. Wang et al. (2014) estimated the global annual production of fluorotelomer-based products to range between 2500 and 20 000 tonnes for the years 1961 to 2004, and was estimated or projected at 45 000 tonnes per year for the period 2005 to 2030. The authors also reported that, since 2002, there has been a geographical shift of industrial sources of PFCAs (particularly fluoropolymer production sites) from the USA, Western Europe and Japan to emerging Asian economies, especially China.

31. Information collected for the years 2004 and 2005 indicate that eight products containing compounds related to long-chain PFCAs (i.e., used for automotive painting, glass treatment and ink cartridges, or as water/oil repellents for textiles, carpets and masonry/cement surfaces) were imported into Australia during that period, for a total volume of up to 33 tonnes (reported as 33 300 kg) per annum (NICNAS 2019). Two compounds related to PFCAs were also imported into Australia in 2005: a perfluorinated furan compound used as an analytical reagent (0.00025 tonnes) and a polymer containing a perfluoroalkylethyl ester moiety used to formulate coatings for wood boards of internal wall cladding (0.15 tonnes).

32. Based on two industry surveys conducted under the authority of the *Canadian Environmental Protection Act*, 1999 (CEPA) (Canada 1999) for the years 1997–2000, and 2004, long-chain PFCAs were not reported to be manufactured or imported into Canada. However, in both surveys, between 1 and 100 tonnes of a number of compounds related to the long-chain PFCAs were reported to be imported into Canada (Environment Canada 2001, 2005). In addition, substances imported within manufactured items, incidentally or not, were not accounted for as they were not reported through these surveys. Lastly, an average of 0.003 tonnes per year of long-chain PFCAs, their salts and/or related compounds were used for analysis, in scientific research or as a laboratory analytical standard, over the period of 2017 to 2021 (ECCC 2022).

33. No intentional manufacturing or use of C9 - C14 PFCAs, their salts or related compounds has been identified in the EU. These substances were reported as being mainly manufactured unintentionally during the manufacturing of PFCAs containing a carbon chain length of less than nine carbon atoms (ECHA 2018b).

34. In their response to the request for Annex E information (2022), Belarus, Monaco, New Zealand, Norway and the Republic of Korea have indicated that long-chain PFCAs, their salts and related compounds are not manufactured in their countries. In addition, New Zealand has stated that none of the long-chain PFCAs or their salts appear in the New Zealand Inventory of Chemicals, but that a number of compounds related to long-chain PFCAs are present on the inventory, indicating they have been used as components in products approved for import into New Zealand.

2.1.2 Uses

35. Based on available information, long-chain PFCAs, their salts their related compounds are used, or may have been used, in a range of applications. Starting materials that may be used for the production of compounds related to long-chain PFCAs consist of fluorotelomer alcohol mixtures of fluorinated chain lengths ranging from 4 to 20 carbons (Beatty 2003; Sherman et al. 2001). Based on the available commercial information, compounds at the upper end of this range (e.g. containing a total

² The names of the companies or countries were not specified in the OECD report.

of 17 to 21 carbons) may represent a lower proportion of the mixtures (e.g. up to 4% by weight) compared to compounds at the lower end of the range (refer to Table 1 of UNEP/POPS/POPRC.18/INF/x for details). Nonetheless, taking into account the estimated production

volumes of fluorotelomers worldwide (as described in section 2.1.1), there is potential for significant loading of C9 - C21 PFCAs into the environment.

36. Long-chain PFCAs and their related compounds may also be unintentionally produced during the manufacturing of PFAS, including those containing a carbon chain of less than nine carbon atoms (Prevedouros et al. 2006; ECHA 2018b, as described in section 2.1.2 of

UNEP/POPS/POPRC.18/INF/ \mathbf{x}), and in other industrial processes, such as the manufacture of polytetrafluoroethylene (PTFE) powders and the polymerisation of fluoropolymers (ECHA 2018b, 2020). As a result, long-chain PFCAs may be present in certain products and articles as impurities.

37. Details on identified uses and reported detections of long-chain PFCAs, their salts and related compounds in products and articles are provided below. Note that, for the majority of the studies that reported the detection of long-chain PFCAs, the homologues at the end of range (i.e. > C14 PFCAs) were not part of the analysis.

Industrial applications

38. APFN was identified as being used for surfactant applications and in the production of fluoropolymers, primarily PVDF (Prevedouros et al. 2006; OECD 2015). Fluoropolymers, such as PVDF, have many applications including use in cables, wires and electronics, as fire- or weather-resistant coatings for materials in construction-related applications, in the pulp and paper industry, and in nuclear waste processing (Banks 1994; Ebnesajjab 2013).

39. Fluorotelomer epoxides, olefins or alcohols have been reported to be used as building blocks in the production of fluorotelomer-based substances. These substances are used in commercial products to provide oil-, grease-, water- and stain-repellent properties to other substrates. Some fluorotelomer-based substances can be further exploited as monomers (e.g. 10:2 fluorotelomer acrylate monomers (FTAcs)) to generate side-chain fluorinated polymers with the same characteristic properties (e.g. 10:2 fluorotelomer acrylate (FTA)) (Environment Canada 2012; Kannan et al. 2011). Some compounds related to long-chain PFCAs are also listed in the Substances in Preparations in Nordic Countries (SPIN) database for the manufacture of chemicals and chemical products, and patented as mould release agents (Glüge et al. 2020).

Electronic articles, medical devices and photo-imaging

40. Available patent information indicates that certain compounds related to long-chain PFCAs may be used in electronic articles (e.g., semiconductors) and medical devices (i.e., UV-hardened dental restorative materials, manufacturing of contact lenses) (Swedish Chemicals Agency 2015; ECHA 2018b). Other compounds related to long-chain PFCAs have also been used as functional fluids in computer and electronic product manufacturing (Glüge et al. 2020).

41. Based on information provided by I&P Europe and available patent information, long-chain PFCAs, their salts and their related compounds are used in photographic materials³ (I&P Europe Annex E information 2022; Glüge et al. 2020).

Automotive care products

42. C9 – C12 PFCAs have been detected in automotive lubricants (i.e. engine oils, hydraulic fluids and greases) (Zhu and Kannan 2020), and compounds related to long-chain PFCAs were reported to be, or to have been, used in products for motor vehicle repair (Nordic Council of Ministers 2015, as summarized in NICNAS, 2019) and in automotive waxes and polishes (Glüge et al. 2020).

Food-contact material, cookware and household products

43. C9 – C18 PFCAs and related compounds, such as 10:2 monoPAP, diPAPs (8:2 and 8:2/12:2) and FTOHs (8:2, 10:2, 12:2, 14:2, 16:2 and 18:2), have been detected in food contact materials (Schaider et al. 2017; Xenia et al. 2011; Vestergren et al. 2015; Kotthoff et al. 2015; Blom and Hanssen 2015; Borg and Irvasson 2017; Gebbink et al. 2013; Guo et al. 2009; Liu et al. 2014c; Granby and Tesdal Håland 2018; Schultes et al. 2019; Yuan et al. 2016) and C9 – C12 PFCAs in plastic pet food packages (Chinthakindi et al. 2021). C10 PFCA has also been measured in recycled paper food packaging materials (Curtzwiler et al. 2021). C9 – C12 PFCAs were detected in non-stick cookware (Guo et al. 2009), and FTOHs (10:2 and 8:2) found in, and as emissions from, non-stick cookware

³ I&P Europe has indicated that companies in the photo-imagining industry in Europe are in the final stage of eliminating this use, with these materials no longer being in the market by July 2025.

(Sinclair et al. 2007; Herzke et al. 2012; Blom and Hanssen 2015).

44. C9 – C12 PFCAs have been measured in household carpet care liquids and foams (Guo et al. 2009; Liu et al. 2014), and FTOHs (10:2 and 8:2) found in certain dish cleaning or rinsing agents (Kotthoff et al. 2015; Dinglasan-Panlilio and Mabury 2006; Blom and Hanssen 2015).

Printing ink

45. 8:2 FTOH has been detected in printer inks (Herzke et al. 2009).

Building and construction materials

46. Mono- and diPAPs are listed in the SPIN database for use in the building and construction sector (Glüge et al. 2020). C4 – C14 PFCAs, FTOHs (8:2 and/or 10:2) and FTUCAs (10:2 and 8:2) were detected in building materials, such as coatings and foil for facades or glass-substituents, and window films (Janousek et al. 2019; Bečanová et al. 2016; Gewurtz et al. 2009). C9 – C12 PFCAs have been detected in floor waxes and stone/tile/wood sealants, thread seal tapes and pastes (Guo et al. 2009; Liu et al. 2014). Compounds related to long-chain PFCAs, such as FTOHs and side-chain fluorinated polymers, were measured in surfactants used in caulks, paints, coatings, adhesives and floor waxing (Dinglasan-Panlilio and Mabury 2006), and have been reported to be used in polishing agents, paints, lacquers and varnishes (Banks 1994; Nordic Council of Ministers 2015, as summarized in NICNAS, 2019).

Fire-fighting foam

47. C9 – C14 PFCAs, FTA (8:2), fluorotelomer sulfonate (FTSA) (8:2) and FTOHs (10:2 and 8:2) have been detected or reported to be used in aqueous film-forming foams (Herzke et al. 2009, 2012; Swedish Chemicals Agency 2015; Nordic Council of Ministers 2015, as summarized in NICNAS, 2019; Favreau et al. 2017). C9 and C10 PFCAs have also been measured in fluorocarbon surfactants used for the preparation of aqueous film-forming foams (Mumtaz et al. 2019).

Ski waxes

48. C9 – C21 PFCAs and 8:2 FTOHs have been measured in ski waxes/gliders or their raw materials (Kotthoff et al. 2015; Plassman and Berger 2013; Blom and Hanssen 2015; Fang et al. 2020).

Personal care and other consumer products

49. C9 – C14, C16 PFCAs and some related compounds, such as monoPAP (8:2 and 10:2) diPAP (e.g. 8:2/8:2 and 8:2/10:2), FTOHs (8:2 and 10:2), fluorotelomer methacrylate (FTMAc) (8:2 and 10:2) and 8:2 FTSA, were reported to be found in cosmetics, sun creams, dental floss and/or body lotions (reviewed in ECHA 2018b; Blom and Hanssen 2015; Danish Environmental Protection Agency 2018; Guo et al. 2009; Whitehead et al. 2021; Swedish Chemicals Agency 2021; Schultes et al. 2018).

50. C9 – C12 PFCAs, FTOHs (8:2, 10:2, 12:2, 14:2 and 16:2) and fluorotelomer ethoxylates (FTEOs, 8:2, 10:2, 12:2, 14:2 and 16:2) have been detected in anti-fog sprays and cloths (Herkert et al. 2022). C9 – C14 and C16 PFCAs, FTCAs (8:2 and 10:2), FTOHs (8:2 and 10:2) and FTAcs (8:2 and 10:2) have been measured in the fabric, foam and laminated composites of foam/fabric from children's car seats (Wu et al. 2021).

Textiles and apparel

51. Long-chain PFCAs (C9 – C14, C16), FTOHs (10:2 and 8:2), FTCAs and FTUCAs have been detected in apparel, including in adults and/or children outerwear and baby/children's bibs (Gremmel et al. 2016; Berger and Herzke 2006; Commission for Environmental Cooperation 2017; Borg and Irvasson 2017; Liu et al. 2014), and membranes for apparel (Liu et al. 2014). A study conducted by Kotthoff et al. (2015) also reported detections of C9 – C14 PFCAs and/or FTOHs (10:2 and 8:2) in outdoor textiles (e.g., jackets, gloves) and leather samples. An analysis of the same samples conducted for a limited number of items indicated a correlation between FTOH (10:2 and 8:2) and PFCA (C10 and C8) concentrations (r=0.957; p=0.0013) (Kotthoff et al. 2014). C9 – C12 PFCAs have been detected in medical garments (Guo et al. 2009; Liu et al. 2014) and firefighter turnout gear (Peaslee et al. 2020).

52. C9 – C11 PFCAs and compounds related to long-chain PFCAs, such as FTOHs (8:2 and 10:2), FTA (8:2) and FTMAc (8:2), have been reported to be used in fabric protectors, textile impregnation agents and carpet protectors (Banks 1994; Nordic Council of Ministers 2015, as summarized in NICNAS, 2019; Favreau et al. 2017). C9 – C14 PFCAs and/or FTOHs (10:2 and 8:2) have been detected in home textiles (e.g., curtains, bed covers/linens, quilts, carpets, table cloths) (Commission for Environmental Cooperation 2017; Vestergren et al. 2015; Herzke et al. 2009, 2012; Blom and

Hanssen 2015; Guo et al. 2009; Liu et al. 2014), impregnation/water proofing agents (Herzke et al. 2012; Kotthoff et al. 2015; Borg and Irvasson 2017), and industrially applied polymeric (carpet protector) (Dinglasan-Panlilio and Mabury 2006). C4 – C14 PFCAs and/or FTOHs (8:2 and/or 10:2) were also measured in other types of fabric/textiles (i.e., awning, seat cover for public transportation, maritime application) (Janousek et al. 2019).

2.1.3. Releases to the environment

53. There are no known natural sources of long-chain PFCAs, their salts and related compounds (Kissa 1994). Their presence in the environment is due solely to human activity. Long-chain PFCAs can be released to the environment from direct and indirect sources. Direct sources include emissions from the production of PFCAs, as well as the life cycle (i.e. production, use and disposal) of products containing long-chain PFCAs, either as a main ingredient, or as residuals or chemical reaction impurities in products. Indirect sources are those where compounds related to the long-chain PFCAs emitted to the environment have degraded to long-chain PFCAs through biotic or abiotic degradation (OECD 2015; Wang et al. 2014).

54. Long-chain PFCAs, their salts and related compounds have been detected in environmental and other matrices from various impacted sites. Details are provided below and in Table 2 of UNEP/POPS/POPRC.18/INF/x.

55. C9 – C16 PFCAs, FTOHs (8:2 and 10:2), diPAP (8:2), FTUCAs (8:2 and 10:2) and FTSA (8:2, 10:2, 12:2, 14:2) have been measured in various environmental matrices (e.g. water, groundwater, soil, air, wastewater, sediment) collected in proximity to production facilities, electroplating industrial parks, a paper products factory and in industrial or urban areas located in India, China, South Korea, Germany, Norway and Japan (Chen et al. 2018a; Li and Hua 2021; Heydebreck et al. 2016; Lam et al. 2014; Sharma et al. 2016; Sim et al. 2021; Göckener et al. 2022; Takemine et al. 2014; Yu et al. 2022; Yao et al. 2016; Jiawei et al. 2019; Langberg et al. 2020; Kim et al. 2021). Yu et al. reported increasing temporal trends for C9 – and C10 PFCAs concentrations in Taihu Lake, China from 2009 and 2021 (Yu et al. 2022).

56. C9 – C12 PFCAs have also been measured in groundwater contaminated with aqueous filmforming foam (AFFF) collected at U.S. military bases (Backe et al. 2013). C9-C14 and C16 PFCAs, FTCAs (8:3, 9:3 and 11:3), 8:2 FTUCA and FTSAs (8:2, 10:2, 12:2 and 14:2) have also been detected in groundwater and/or soil sampled in AFFF-impacted sites from four Canadian airports (Liu et al. 2022).

57. Long-chain PFCAs and their related compounds may also be released to the environment from waste treatment facilities, such as landfills, incineration plants and wastewater treatment plants. C9 -C18 PFCAs, FTOHs (8:2, 10:2 and 12:2), FTCAs (8:2 and 10:2), FTAs (8:2 and 10:2) and FTUCAs (8:2 and 10:2) have been measured in leachate, percolate or soil from landfills located in the United States (US), China, South Korea, Canada, Germany and Spain (Lang et al. 2017; Liu et al. 2021; Sim et al. 2021; Benskin et al. 2012a; Busch et al. 2010; Fuertes et al. 2017; Kameoka et al. 2021; Weinberg et al. 2011). C9-C18 PFCAs and compounds related to long-chain PFCAs have also been detected in sludge, biosolids, influent and effluent from wastewater treatment plants located in various countries around the world (reviewed in Lenka et al. 2021; Alder and von der Voet 2014; Loganathan et al. 2007; Rodríguez-Varela et al. 2021; Schultz et al. 2006; Bossi et al. 2008; Moodie et al. 2021; Pepper et al. 2021; Ahrens et al. 2011; Yao et al. 2016; Nguyen et al. 2022; Nordic Council of Ministers 2019; Austria Annex E information 2022). In addition, C9 – C14 PFCAs and 8:2 diPAPs have been measured in leachate, fly ash and bottom ash from a municipal solid waste incineration plants (Liu et al. 2021). C9-C12 and C14 PFCAs and FTOHs (8:2 and 10:2) have also been measured in air around wastewater treatment plants and landfills (Ahrens et al. 2011; Shoeib et al. 2016).

58. Land application of contaminated biosolids can also be a source of long-chain PFCAs releases to the environment. C9 – C14 PFCAs have been detected in water (surface, well and ground) and soil from agricultural sites with a history of land application of biosolids (Lindstrom et al. 2011; Pepper et al. 2021; Sepulvado et al. 2011; Sim et al. 2021; Johnson 2022).

59. Ski wax has also been identified as a source emission of long-chain PFCAs and related compounds to the environment. C9 – C21 PFCAs were measured in snow collected after cross-country ski competitions and/or in soil from skiing areas after snowmelt (Carlson and Tupper 2020; Plassman and Berger 2013; Grønnestad et al. 2019).

60. Some uses of long-chain PFCAs, their salts and their related compounds may lead to releases to indoor environments. C9 – C15 PFCAs have been detected in indoor air and/or dust samples from several countries at various locations including private homes, hotels, office buildings, vehicles and daycares (see section 2.3.2 and Table 5 in UNEP/POPS/POPRC.18/INF/x for details).

61. Building on early work by Prevedouros et al. (2006), Wang et al. estimated the global cumulative emissions of C4 – C14 PFCAs for the years 1951 to 2030 (summarized in Table 3 of UNEP/POPS/POPRC.18/INF/x) from quantifiable sources⁴ of these substances (Wang et al. 2014). These estimates were generated by combining data on products containing PFCAs and/or their precursors (including manufacturing processes, production volumes as a function of time, and use patterns) with estimated or empirically derived emission factors during each stage in the product life-cycle. Uncertainties of the PFCA emissions were accounted for by defining lower and higher emission scenarios, which differed approximately by a factor of eight. Total estimated or projected global cumulative emissions of individual C9 – C14 PFCAs, between 1951 and 2030, ranged from 0 to 1901 tonnes (i.e., 250 – 1901 tonnes (C9); 8 – 222 tonnes (C10); 67 – 689 tonnes (C11); 0 – 63 tonnes (C12); 17 – 147 tonnes (C13); 0 – 19 tonnes (C14)). The sources of the estimated emissions differed between PFCA homologues, sometimes considerably, and the relative contributions of each source changed over time (refer to Figure 1 of UNEP/POPS/POPRC.18/INF/x for more details).

2.2. Environmental fate

2.2.1 Persistence

62 Long-chain PFCAs are carboxylic acids bonded to a fully fluorinated carbon chain, with total carbon numbers from 9 to 21. This carbon-fluorine bond is one of the strongest covalent bonds (about 108 - 120 kcal/mole) (Dixon 2001; Parsons et al. 2008), making the bond extremely stable and generally resistant to degradation by acids, bases, oxidants, reductants, photolytic processes, microbes and metabolic processes. Fluorine also has the highest electronegativity of all elements in the periodic table. The presence of fluorine instead of hydrogen on the carbon chain alters the thermal, chemical and biological characteristics of the molecule. The strong carbon-fluorine bond and high density of electron-rich repellent fluorine atoms protects the carbon backbone and results in inertness to both heat and chemical reagents (Hakli et al. 2008; Colomban et al. 2014; Parsons et al. 2008). Moreover, this contributes to a high ionization potential, low polarizability, low inter- and intra-molecular interactions and low surface tension. Therefore, long-chain PFCAs are considered stable in the environment. For example, C9 PFCA did not biodegrade under the OECD 301F method (Stasinakis et al. 2008). Other studies demonstrate that long-chain PFCAs do not degrade under environmentally relevant conditions (e.g., Hori et al. 2005a; Hori et al. 2005b; Hori et al. 2008; Qu et al. 2016; Liu et al. 2017). Other studies, conducted under conditions considered not environmentally relevant, have reported some degradation of long-chain PFCAs (Taniyasu et al. 2013; Barisci and Suri 2020, refer to section 2.2.1 of UNEP/POPS/POPRC.18/INF/x for details).

63. Long-chain PFCAs have met the regulatory criteria for persistence in different jurisdictions. In the European Union, C9 – C10 PFCAs have been identified as persistent and C11 – C14 PFCAs have been identified as very persistent in accordance with the criteria set out in the REACH regulation (ECHA 2012a, b, c, d, 2015, 2016). In Canada, the ecological screening assessment for long-chain PFCAs, their salts and their precursors (Environment Canada 2012) concluded that long-chain PFCAs and their salts meet the criteria for persistence as set out in the *Persistence and Bioaccumulation Regulations* (Canada 2000). It is additionally recognized that transformation of precursors into stable long-chain PFCAs results in their increased presence in the environment.

2.2.3 Bioaccumulation

64. The unique characteristics and physicochemical properties of long-chain PFCAs are relevant to the potential for bioaccumulation. Long-chain PFCAs are non-volatile substances with combined properties of ionization, lipophobicity, hydrophobicity, and hydrophilicity over different portions of the molecule. The carboxylate functional group attached to the perfluorinated chain also imparts polarity to the molecule. Due to these properties, the hydrophobic and lipophilic interactions between long-chain PFCAs and the substrate are not the main mechanisms that govern their bioaccumulation, which is unlike most organic chemicals (Hekster et al. 2002). Hydrophobicity is unlikely to be the main driving force for partitioning to tissues, as the lipophobic tendencies oppose this partitioning process; instead, electrostatic interactions may be more important (Hekster et al. 2002). Additionally, the presence and metabolic transformation of compounds related to long-chain PFCAs in wildlife can add to the body burden of long-chain PFCAs (Nabb et al. 2007; Letcher et al. 2014).

65. Although octanol-water partitioning coefficient (log K_{ow}) values are traditionally used as an indicator for bioaccumulation, meaningful log K_{ow} values cannot be reliably measured or modelled for

⁴ Historial and ongoing use of: 1) PFOA as processing aids in the (emulsion) polymerization of PTFE, fluorinated ethylene propylene, perfluoroalkoxyl polymer and PVDF; 2) C9 PFCA as processing aids in the emulsion polymerization of PVDF; 3) chemicals derived from perfluorooctane sulfonyl fluoride; and x:2 fluorotelomer-based substances.

surface-active and ionizing substances such as long-chain PFCAs. Only modelled K_{ow} values are available for long-chain PFCAs (e.g., Wang et al. 2011). Long-chain PFCAs tend to migrate to the interface of the organic (lipid) and aqueous phases rather than partition between the two phases (Houde et al. 2006; OECD 2002). Some portions of the perfluorinated molecule can interact with phospholipids (Armitage et al. 2012; Dassuncao et al. 2019; Droge et al. 2019) but most studies show that protein-rich tissues (i.e., yolk, liver, and blood) are the primary repositories for long-chain PFCAs rather than lipids due to its highly hydrophobic tail and the polar headgroup that facilitates both hydrophobic and ionic interactions with proteins (Jones et al. 2003; Bischel et al. 2010; Woodcroft et al. 2010; Bischel et al. 2011; Ng and Hungerbuhler 2013; Cheng and Ng 2018; Zhong et al. 2019). Therefore, it is inappropriate to use log K_{ow} to characterize bioaccumulation and for predictive purposes (e.g., bioaccumulation models) for long-chain PFCAs (OECD 2002; Conder et al. 2008). Instead, empirical bioaccumulation data is more relevant. Refer to section 2.2.3 of UNEP/POPS/POPRC.18/INF/x for more details.

Both bioconcentration and bioaccumulation empirical data are available for some long-chain 66. PFCAs. Laboratory-derived bioconcentration factors (BCF, L/kg) and bioaccumulation factors (BAF, L/kg) have been reported (up to C18 PFCA) in three freshwater fish species (i.e., zebrafish (Danio rerio), common carp (Cyprinus carpio L.) and rainbow trout (Oncorhynchus mykiss)) and one green mussel species (Perna viridis) as well as saltwater species blackrock fish (Sebastes schlegeli) (Martin et al. 2003a, Martin et al. 2003b, Jeon et al. 2010, Liu et al. 2011a, Inoue et al. 2012, Goeritz et al. 2013, Chen et al. 2016, Menger et al. 2020). Laboratory BCF/BAF values were variable depending on the species and age of the test organism. For example, whole body BCFs in common carp were determined for C11 PFCA (2300 - 3700), C12 PFCA (10 000 - 16 000), C13 PFCA (16 000 - 17 000), C16 PFCA (4700 - 4800) and C18 PFCA (320 - 430) (Inoue et al. 2012). BCF and BAF values generally increased from C9 PFCA (<0.4 - 1514) to C14 PFCA (17 000 - 363 078) and then decreased for C16 to C18 PFCAs (20 - 4800). Field-derived BCFs and BAFs in freshwater and marine aquatic organisms have been reported up to C15 PFCA. For example, BAFs were determined for common carp collected from a drainage canal near a sewage treatment plant outfall (Tokyo, Japan) with liver BAFs that ranged from 69 (C9 PFCA) to $> 26\ 000$ (C13 PFCA) and kidney BAFs that ranged from 2600 (C9 PFCA) to > 40 000 (C13 PFCA) (Murakami et al. 2011). Field-derived BCFs and BAFs were variable depending on the species and ranged from 3.9 (C9 PFCA) to 5 011 872 (C12 PFCA). Field-derived BCFs and BAFs also generally increased from C9 PFCA to C14 PFCA and then declined at C15 PFCA (> 59 - 224) (Kwadijk et al. 2010, Labadie and Chevreuil 2011, Murakami et al. 2011, Zhou et al. 2012, Naile et al. 2013, Fang et al. 2014, Pan et al. 2014, Ahrens et al. 2015, Gebbink et al. 2016, Liu et al. 2019a, Liu et al. 2019b, Munoz et al. 2019, Pan et al. 2019, Choi et al. 2020). However, field-derived BAF values for very long chain PFCA are not often reported because it is not feasible to measure long PFCA in water due to low water solubility causing the concentrations to be very low. In other studies, researchers have estimated BAF using detection limits. For example, Zhang et al. derived BAF for marine plankton by substituting non-detect concentrations in water with the detection limit (Zhang et al. 2019). In a recent review of BCF and BAF of PFAS in aquatic species, Burkhard did not include any data that were based on concentrations below detection limit in water or tissue, which therefore limited reporting to a maximum of C10 chain length (Burkhard 2021). This has been circumvented using lab-based exposures that are not limited by environmental concentrations, in order to empirically measure BCF and BAF for a larger range of chain lengths (i.e. all of those papers above). However, Burkhard 2021 reported that laboratory BCF measurements decline with increasing exposure concentration, rather than remaining constant. It was postulated that PFAS body burden is controlled by both passive and active transport processes, the latter of which can be concentration dependent. As such, laboratory-derived BCF using high concentrations are expected to be lower than a real-world scenario.

67. Extrapolating BCF/BAF data from fish and aquatic invertebrates to birds and terrestrial/marine mammals can underestimate the bioaccumulation potential for long-chain PFCAs. For neutral organic chemicals that are non-polar and non-volatile (e.g., PCBs), bioaccumulation generally occurs by the same mechanism in water-breathing organisms (e.g., fish and aquatic invertebrates) and air-breathing organisms (e.g., terrestrial/marine mammals or birds). As neutral chemicals have low elimination rates to both water and air, this results in similar bioaccumulation potential for both air-breathing and water-breathing organisms (Kelly et al. 2004; Mackay and Fraser 2000). However, long-chain PFCAs that are ionizing, polar, and non-volatile have higher water solubility compared to neutral chemicals. For water-breathing organisms, this can result in a more rapid elimination of long-chain PFCAs to the water phase and a subsequent reduction in bioaccumulation potential. The moderate water solubility of long-chain PFCAs causes a relatively high tendency to escape from the gills into water, whereas the escaping tendency of long-chain PFCAs to the air, across the alveolar membrane of the lung, would be relatively low because of their low vapor pressure and negative charge. As bioaccumulation in air-breathing organisms is driven primarily by volatility rather than polarity, the non-volatile nature of

long-chain PFCAs promotes a relatively slow elimination to air, resulting in higher bioaccumulation potential in air-breathing organisms (Kelly et al. 2004). That is, fish gills provide an additional mode of elimination for long-chain PFCAs that birds and terrestrial/marine mammals do not possess (Martin et al. 2003a). Additionally, extrapolating BCF/BAF data from fish to marine/terrestrial mammals should not be performed due to the biological differences between higher and lower trophic levels (e.g., feeding rates, assimilation efficiency, and depuration rates) (Martin et al. 2003a). As such, field biomagnification factors (BMF, unitless) and trophic magnification factors (TMF, unitless) are more relevant in determining the overall bioaccumulation potential for long-chain PFCAs.

Field biomagnification or trophic magnification studies on long-chain PFCAs (up to C16 68. PFCA) that focused on multiple fish species and/or top predator species (i.e., birds or terrestrial/marine mammals) show higher biomagnification potential (Martin et al. 2004, Houde et al. 2006a, Haukås et al. 2007, Butt et al. 2008, Powley et al. 2008, Kelly et al. 2009, Tomy et al. 2009b, Loi et al. 2013; Müller et al. 2011, Fang et al. 2014, Xu et al. 2014, Munoz et al. 2017b, Boisvert et al. 2019, Simonnet-Laprade et al. 2019b). Biomagnification factor and trophic magnification factor values above one are considered bioaccumulative. For example, a marine food web in Liaodong Bay, China, with black-tailed gulls (Larus crassirostris) as the top predator species had TMFs that ranged from 1.78 to 4.88 for C9 – C14 PFCAs, based on whole body concentration estimates using muscle and liver data (Zhang et al. 2015). The Orge River foodweb, in France, with eight freshwater fish species as top predators but with varying feeding behaviours had BMFs that ranged from 0.3 to 25.2 and TMFs that ranged from 1.5 to 3.0 (Simonnet-Laprade et al. 2019a). Five other riverine foodwebs in France with chub (Squalius cephalus) and common barbel (Barbus barbus) as top predator species had TMFs that ranged from 0.9 to 14.9 for C9 – C14 PFCAs (Simonnet-Laprade et al. 2019b). TMF and BMF values have been reported for several food webs globally, and are detailed in section 2.2.3 of UNEP/POPS/POPRC.18/INF/x. Overall, TMF values ranged from 0.3 to 19.8 and BMF values ranged from 0.1 to 25.2 with top predator species (e.g., black-tailed gulls, egrets, carnivorous fish, ringed seal, beluga whales, polar bears and wolves) having values consistently above 1.

69. There are no biomagnification or trophic magnification data for long-chain PFCAs with chain lengths greater than C16 due to the analytical challenges of measuring very long chain PFCAs. However, it is expected that C17 - C21 PFCAs can also biomagnify in birds and terrestrial/marine mammals. C17 - C21 PFCAs have been measured in snow and soil (Plassman and Berger 2013), C9 - C11, C14 and C18 were measured in air samples in the Arctic (Wong et al. 2018) and C16 - C18 PFCAs have been measured in top predator species such as the peregrine falcon (*Falco peregrinus*) from the Great Lakes region (Canada) (Sun et al. 2020), and in the eggs of herring gulls (*Larus argentatus*) and Caspian tern (*Hydroprogne caspia*) from colony sites across the Great Lakes basin (Canada and the U.S.) (Letcher et al. 2015; Su et al. 2017), as well as in the liver of East Greenland polar bears (Greaves et al. 2013; Boisvert et al. 2019) and Hudson Bay polar bears (Letcher et al. 2018).

70. A read-across argument can also be made to address data gaps. The high degree of chemical similarity for the series of acids has been described earlier and is suggestive of similar bioaccumulation characteristics. There is empirical evidence of bioaccumulation for long-chain PFCAs up to C16. There is evidence of use/release of compounds related to C17 – C21 PFCAs. PFCAs with linear perfluoroalkyl chains (Deff = 0.61 - 0.96 nm in C8 to C18 PFCAs) can enable them to pass through biological membranes (Inoue et al. 2012). Wang and Ober (1999) have suggested that the carbon-carbon conformation changes as the fluorocarbon chain length increases, with longer chains becoming more helical, resulting in reduced cross-sectional diameter molecules. This leads to greater bioaccumulation potential than might be expected based on molecular weight and other physical chemical considerations (Anliker et al. 1988, Dimitrov et al. 2003). Recognizing that analytical limitations present challenges in empirical determinations, it is concluded that C17 – C21 PFCAs have the potential to bioaccumulate.

71. In humans, long-chain PFCAs accumulate in the blood and well perfused tissues such as the liver and kidneys (Kudo 2015). Long-chain PFCAs are eliminated very slowly from the human body, likely due to their strong protein binding affinity and the reabsorption processes occurring at the hepatic, intestinal and renal level (EFSA 2020). The mean half-lives for C9 PFCA are estimated to range from 2.5 to 4.3 years in humans whereas the mean half-lives for both C10 and C11 PFCA range from 4.5 to 12 years (Zhang et al. 2013). In studies with C4 - C10 PFCAs, compounds with longer carbon chains have been found to bind more strongly to proteins (Chen et al. 2020). Although it is unclear if this trend holds for compounds above C10 PFCA (Jackson et al. 2021). Several animal studies suggest that the longer the carbon chain length, the more slowly the PFAS is eliminated, and thus, the more bioaccumulative it is (Ohmori et al. 2003; Kudo et al. 2006; Yeung et al. 2009).

72. Although information is lacking for the bioaccumulation of C12 - C21 PFCAs in humans, a

read-across argument can be made to address data gaps. The high degree of chemical similarity for the series of acids has been described earlier and is suggestive of similar bioaccumulation characteristics. There is direct evidence of the long half-lives of C9, C10 and C11 PFCAs in humans, and in animal studies, there is evidence of slower elimination with increasing chain lengths. There is also evidence of increasing protein binding with increasing chain length for C4 – C10 PFCA, with some uncertainty acknowledged for longer PFCAs. Consequently, it is reasonable to expect that long-chain PFCAs of up to 21 carbons may bioaccumulate in humans.

73. Long-chain PFCAs have met regulatory criteria for bioaccumulation in some jurisdictions. Long-chain PFCAs (C9 – C14) have been assessed in the European Union and identified as bioaccumulative (C9 and C10 PFCAs) or very bioaccumulative (C11 to C14 PFCAs) in accordance with the criteria set out in the REACH regulation (ECHA 2012a,b,c,d, 2015, 2016). In Canada, the ecological risk assessment for long-chain PFCAs, their salts and their precursors (Environment Canada 2012) used a weight of evidence approach based on BMF and TMF data to conclude that long-chain PFCAs and their salts accumulate and biomagnify in birds, and terrestrial/marine mammals.

2.2.4 Potential for long-range environmental transport

74. Long-chain PFCAs, their salts and related compounds are measured in both biotic and abiotic samples in remote areas, such as the Antarctic and the Canadian Arctic that are far from known manufacturing sites. Long-range transport pathways include atmospheric and oceanic transport of long-chain PFCAs and/or related compounds. Examples of compounds related to long-chain PFCAs include fluorotelomer alcohols (e.g., 8:2 FTOH, 10:2 FTOH, 12:2 FTOH) and their fluorotelomer acid derivatives (e.g., 10:2 FTA; 10:2 FTUCA).

Global modelling indicates that long-chain PFCAs, their salts and/or related compounds have 75. the potential to be transported over long distances (Wallington et al. 2006; Wania 2007; Yarwood et al. 2007; Thackray et al. 2020). The presence of long-chain PFCAs in remote areas can be attributed to related compounds (e.g., FTOH) emitted to the atmosphere ultimately yielding long-chain PFCAs through biotic or abiotic degradation. Wallington et al. (2006) used a three-dimensional global atmospheric chemistry model (IMPACT) to show that 8:2 FTOH degrades in the atmosphere to form C9 PFCA. Young et al. (2007) suggested that the presence of C9 - C11 PFCAs on several Canadian High Arctic ice caps (Melville Ice Cap (Northwest Territories), Agassiz Ice Cap (Nunavut), and Devon Ice Cap (Nunavut)) is indicative of atmospheric oxidation of volatile precursors. Young et al. (2007) detected C9 PFCA (0.005 - 0.246 ng/L), C10 PFCA (ND - 0.022 ng/L), and C11 PFCA (ND - 0.027 ng/L). Ellis et al. (2004) showed that the atmospheric lifetime of FTOHs, as determined by their reaction with hydroxy radicals, was approximately 20 d which would allow precursors to be slowly oxidized by atmospheric radical species to give fluorinated acids that would then be deposited in remote areas by precipitation (Waterland and Dobbs 2007). Atmospheric measurements confirm modelling results, in that volatile precursors can reach the Arctic and Antarctic latitudes where they may be biodegraded or transformed to long-chain PFCAs (Shoeib et al. 2006; Jahnke et al. 2007; Stock et al. 2007; Young et al. 2007; Cai et al. 2012a; Kwok et al. 2013; Wang et al. 2015b; Casal et al. 2017; MacInnis et al. 2019; Pickard et al. 2018; Wong et al. 2018; Joerss et al. 2020). Details are provided in Table 4 of UNEP/POPS/POPRC.18/INF/x.

Rauert et al. (2018) reported on long-chain PFCAs and related compounds at three Arctic sites 76. including the Canadian Arctic for the years 2009-2015 under the Global Atmospheric Passive Sampling (GAPS) Network. The levels of FTOHs (8:2 and 10:2) ranged between <2 to 121 pg/m³ and of C9 - C14 PFCAs ranged from <0.03 to 8 pg/m³ with C9 having the highest concentration. Wong et al. (2018) also summarized air concentrations and trends of PFCAs and related compounds at the Canadian High Arctic station of Alert, and at Zeppelin and Andøya stations in the Norwegian Arctic from 2006 to 2014. At Alert, concentration ranges of FTOHs (8:2 and 10:2) and FTAs (8:2 and 10:2) were <0.015 to 21 pg/m³ and <0.033 to 0.71 pg/m³, respectively. 8:2 and 10:2 FTOHs showed slow increasing trends with doubling times of 5.0 and 7.0 years, respectively. C9-C14, C16 and C18 showed concentrations of < 0.0063 - 0.77 pg/m³ at Alert, with C9 having the highest concentrations. At Zeppelin and Andøya, C9 - C11 PFCAs showed concentrations of < 0.079 to 11 pg/m^3 , with C9 and C10 showing the highest concentrations. Stock et al. (2007) measured C9 – C12 PFCAs (0.2 - 19)ng/L) and their FTOH acid derivatives (i.e., 8:2 FTUCA and 10:2 FTUCA) in Resolute Lake, Char Lake, and Amituk Lake on Cornwallis Island (Nunavut, Canada). Wong et al. (2021) reported that atmospheric levels of 8:2 and 10:2 FTOH increased between 2006 and 2012, followed by decreasing trends from 2012 to 2017, where the half-lives were derived as 4.0 and 3.0 years for 8:2 and 10:2 FTOH, respectively. By modelling air mass transport densities and comparing temporal trends in deposition with production changes of possible sources, Pickard et al. (2018) determined that the deposition of long-chain PFCAs on the Devon Ice Cap was dominated by atmospheric formation from volatile precursors. Pickard et al. (2018) sampled a 15-m ice core representing 38 years of deposition

(1977 - 2015) from the Devon Ice Cap and detected C9 – C13 PFCAs with concentrations that ranged from 0.00321 - 0.751 ng/L.

Oceanic transport is another long-range environmental transport mechanism for long-chain 77. PFCAs. As perfluorinated alkyl acids, their salts and conjugate bases are highly water-soluble with no appreciable vapor pressure, their presence in the atmosphere may be via sorption to air particulate or their transfer from the surface ocean by sea spray aerosols (Webster and Ellis 2010; Reth et al. 2011; Johansson et al. 2019). Reth et al. (2011) determined that their surface-active properties results in enrichment on the "surface of bursting bubbles". Reth et al. (2011) examined the water-to-air transfer of C6 - C14 PFCAs in a laboratory-scale sea spray simulator and found that the sequestration of the perfluorinated alkyl acids, their salts and conjugate bases out of bulk water to the air-water surface increased exponentially with the length of the perfluorinated alkyl chain. Sha et al. observed a strong correlation of long-chain PFCA in sea spray aerosol and sodium ion, which is a marine tracer (Sha et al. 2022). Measurements of long-chain PFCAs in oceans suggest that oceanic transport does play a role in the transport of long-chain PFCAs to remote regions (Ahrens et al. 2010; Benskin et al. 2012b; Cai et al. 2012a; Cai et al. 2012b; Zhao et al. 2012; Gonzalez-Gaya et al. 2014; Casal et al. 2017; Yeung et al. 2017; Li et al. 2018; Gonzalez-Gaya et al. 2019; Zhang et al. 2019). Additionally, C9 -C12 PFCAs were measured in air samples at two Norwegian coastal sites, and were positively correlated with Na⁺ ion concentrations, which suggests that sea spray aerosols are a source of PFCAs to the atmosphere in coastal areas (2022).

78. Long-chain PFCAs (primarily C9 to C18 PFCAs), have been measured in Antarctic and Arctic environmental matrices, including snow, ice caps, lake water, air, lichen, lake sediment and seawater, and biota such as, penguin (e.g., *Pygoscelis papua*), polar bear (*Ursus maritimus*), Arctic fox (*Vulpes lagopus*), caribou and reindeer (*Rangifer tarandus*), Alaskan sea otter (*Enhydra lutris kenyoni*) and muskox (*Ovibos moschatus*) (Bossi et al. 2005; Letcher et al. 2018; Smithwick et al. 2005a; Smithwick et al. 2005b; Smithwick et al. 2006; Tao et al. 2006; Butt et al. 2007a; Butt et al. 2007b; Butt et al. 2008; Dietz et al. 2008; Hart et al. 2009; Katz et al. 2009; Schiavone et al. 2009; Bengtson Nash et al. 2010; Müller et al. 2011; Greaves et al. 2012, 2013; Llorca et al. 2012; Rotander et al. 2017a; Routti et al. 2016; Routti et al. 2017; Tartu et al. 2017; Boisvert et al. 2019; Costantini et al. 2019; Roscales et al. 2019; Roos et al. 2021). Refer to Table 4 of UNEP/POPS/POPRC.18/INF/x for concentrations in biota.

79. No measurements of C19 – C21 PFCAs in environmental matrices or biota from locations distant from sources have been identified in the literature. A read-across argument can be made to address these data gaps. The high degree of chemical similarity for the series of acids has been described earlier and is suggestive of similar transport mechanisms. There is empirical evidence of the presence of long-chain PFCAs in locations distant from sources of long-chain PFCAs up to C18. While analytical limitations present challenges in empirical determination of certain long-chain PFCAs (refer to section 1), there is evidence of use/release of compounds related to C19 – C21 PFCAs, as indicated by the chain length distribution of FTOHs substances identified in the patent literature. As a result of the release of compounds related to long-chain PFCAs during their production and use in many applications (as described in section 2.1.2), and the potential for these precursors to undergo long-range environmental transport, long-chain PFCAs of up to 21 carbons may be expected to be present in remote environments.

2.3 Exposure

2.3.1 Environmental monitoring data

80. Long-chain PFCAs were detected globally, in all continents as well as in all environmental compartments, including biota, freshwater and saltwater, sediment, soil and rainwater, as can be seen in Figure 1, representing concentrations from 1980 to 2019. Long-chain PFCAs with chain lengths C9 to C14 were measured in Africa, Antarctica, Asia, Europe, North America, Oceana and South America. Only Europe reported measurements of C19 – C21 in the environment, which was measured in snow in Sweden (Plassman and Berger 2013). The list of references used to generate Figure 1 is provided in UNEP/POPS/POPRC.18/INF/x. Details on the reported environmental concentrations of long-chain PFCAs are provided in UNEP/POPS/POPRC.18/INF/z.

81. A further breakdown of worldwide concentrations of long-chain PFCAs is illustrated in Figure 2 of UNEP/POPS/POPRC.18/INF/x, which shows the occurrence of long-chain PFCAs by chain length, as well as measurements in seas and oceans. The compartments in which long-chain PFCAs were measured in all continents were biota, freshwater, and soil. Asia, Europe and North America reported concentrations of long-chain PFCAs in all environmental compartments, including ice/snow, rainwater and sediment. Biota was the compartment with the most reported measurements worldwide

(n=3780), followed by freshwater. Long-chain PFCAs were also measured in saltwater in coastal regions of Asia, Europe, North America, South America, and in seas and oceans. Birds/eggs were the only biota that were sampled in all continents (refer to Figure 3 of UNEP/POPS/POPRC.18/INF/x). The highest concentration of long-chain PFCAs in biota was measured in European starling eggs in Canada (PFDA= 720 ng/g, Gewurtz et al. 2018). Fish were the most studied biota after birds/eggs, followed by mammals, invertebrates, reptiles, and then plants. Some of the highest measured concentrations of long-chain PFCAs were reported in freshwater at an industrial park in Taiwan, at US Air Force sites in North America, and downstream of industrial sites in France (Anderson et al. 2016, Bach et al. 2017). Liu et al. 2012).

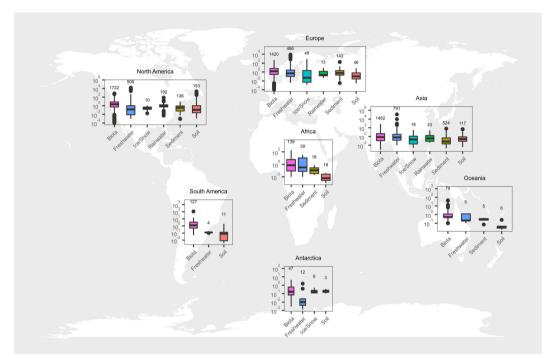


Figure 1. Worldwide occurrence of long-chain PFCAs (C9 – C21) in different environmental compartments. All measurements are in ng/L or ng/g, except for biota which are in ng/mL or ng/g.

Tukey box plots are interpreted as follows: the numbers above the bars indicate the number of data points and the lower and upper hinges (edges) of the box represent the first and third quantiles (Q1 and Q3), which are the 25th and 75th percentiles, respectively, while the black horizontal line within the box represents the second quantile, or the 50th percentile (median). The distance between the 25th and 75th percentile is called the interquartile range (IQR). The lower whisker represents the lowest data that are within the Q1 – 1.5 x IQR threshold, and the upper whisker represents the highest data that are within the Q3 + 1.5 x IQR threshold. Data exceeding these thresholds appear as circles. However, if the minimum and maximum are within these thresholds, they represent the lower and upper whiskers and no outliers are present.

82. Temporal trends for long-chain PFCAs (up to C15 PFCA) have been reported in wildlife (including top predator species found in remote regions such as polar bears) (De Silva and Mabury 2004; Bossi et al. 2005; Letcher et al. 2015; Smithwick et al. 2005a; Smithwick et al. 2006; Butt et al. 2007a; Butt et al. 2007b; Verreault et al. 2007; Butt et al. 2008; Dietz et al. 2008; Tomy et al. 2009a; Holmström et al. 2010; O'Connell et al. 2010; Miller et al. 2015; Gewurtz et al. 2016; Lam et al. 2016; Dassuncao et al. 2017; Smythe et al. 2018; Falk et al. 2019; Gui et al. 2019; Wu et al. 2020; Soerensen and Faxneld 2020). From 1972 to 2002, mean doubling times for concentrations in polar bear livers from North American Arctic regions ranged from 5.8 to 9.1 years for C9 - C11 PFCAs (Smithwick et al. 2006). From 1984 to 2006, 128 sub-adult (3-5 years old) Greenland polar bears showed annual increases for C9 PFCA (6.1%), C10 PFCA (4.3%), C11 PFCA (5.9%), C12 PFCA (52%), and C13 PFCA (8.5%) (Dietz et al. 2008). From 1974 to 2007, C9 – C15 PFCA doubling times ranged from 5.6 to 9.0 years in peregrine falcon (Falco peregrinus) eggs collected from Sweden (Holmström et al. 2010). Temporal trends for the harbor porpoise (Phocoena phococena) populations from the Baltic Sea and North Sea showed that C9 - C13 PFCA concentrations increased significantly from 1991 to 2008 (Huber et al. 2012). Liver and serum mean concentrations of C9 and C10 PFCAs in the Baikal seal (Pusa sibirica) (Lake Baikal, Russia) collected in 2005 were 1.2 and 1.7-fold greater than liver and serum concentrations from 1992 (Ishibashi et al. 2008a). For the years 1980 to 2010, the Σ PFCAs (including C8 – C12 PFCAs) in livers of male beluga whales (Nunavut, Canada) showed an annual

increase of $1.8 \pm 0.5 \text{ ng/g}$ ww (Tomy et al. 2009). For the years 1986 to 2013, C9 – C13 PFCA concentrations in the muscle tissue of North Atlantic male pilot whales (*Globicephala melas*) (caught in Faroe Islands) increased 2.8% to 8.3% per year (Dassuncao et al. 2017).

2.3.2 Human exposure

83. Humans may be exposed to long-chain PFCAs and their related products through indoor dust, food, drinking water, indoor/outdoor air and consumer products; however, the relative importance of each of these pathways for the general population remains unclear (ATSDR 2021).

84. Analyses of major routes of exposure to long-chain PFCAs indicate that house dust ingestion and inhalation of indoor air can make important contributions to total intakes (Shoeib et al. 2011; Poothong et al. 2020). In a study of a Swedish population, the ingestion of house dust was estimated to account for >40% of the C9, C13 and C14 PFCA uptake (Vestergren et al. 2012). Significant positive associations have been noted between levels of C9 PFCA in serum and levels in house dust or air (Makey et al. 2017; Poothong et al. 2020). Significant positive correlations were also noted between C9, C11 PFCAs in serum samples and intakes of their precursor compounds (8:2 FTOH and 10:2 FTOH) from indoor air (Makey et al. 2017; Poothong et al. 2020). Studies have analyzed for C9 – C15 PFCAs in indoor air and/or dust samples from several countries at various locations including private homes, hotels, office buildings, vehicles and daycares (see Table 5 in UNEP/POPS/POPRC.18/INF/x).

Long-chain PFCAs have been infrequently measured and detected in tap water. This may be 85. due in part to the fact that as the length of the perfluorinated chain increases, the water solubility of the PFCA molecule will likely decrease (Ellis et al. 2004). However, some of these substances are still found in drinking water around the world (see Table 6 in UNEP/POPS/POPRC.18/INF/x). For example, C9 – C14 PFCAs were recurrently detected in drinking water samples from Africa, Europe, Asia and the Americas in a study conducted during 2015 to 2016. C9 PFCA was found in the highest concentrations with a maximum value of 4.5 ng/L (Kaboré et al. 2018). In the USA, data on C9 PFCA was collected under the Third Unregulated Contaminant Monitoring Rule. The data showed that in 14 of the 4,920 public water systems (or 19 out of a total of 36,972 water samples) C9 PFCA was detected above the minimum reporting level of 0.02 µg/L (US EPA 2017). Levels of C9 PFCA in tap water were statistically significant predictors of plasma concentrations among individuals who drank more than 8 cups of tap water per day (Hu et al. 2019). In a Chinese study, women drinking bottled water had significantly lower (between 6% and 13%) blood concentrations of C9 - C12 PFCA compared with those consuming mainly tap water (Zhou et al. 2019). Drinking water may be an important source of exposure to long-chain PFCAs in areas contaminated with a point source of pollution. In a study of 29 public drinking water systems (PWS) in New Jersey, USA, C9 PFCA was detected at two PWS at high concentrations of 72 ng/L and 96 ng/L. An industrial facility, where large quantities of C9 PFCA were used as a processing aid in the manufacture of fluoropolymers, is located near the Delaware River about 2 miles from the site with the highest C9 PFCA concentration and is a possible source of contamination at both of these two PWS (Post et al. 2013).

86. The diet has been suggested as a principal exposure route for long-chain PFCAs (Vestergren et al. 2012; Poothong et al. 2020) and a number of studies have investigated the presence of long-chain PFCAs in food items (see EFSA 2020 Annex A4; see section 2.3.2 and Table 7 of UNEP/POPS/POPRC.18/INF/ \mathbf{x}). However overall, the detection frequencies of long-chain PFCAs in food items tend to be low. This is due in part to the methodological challenges associated with targeted analyses in varied and complex food matrices. When detected in foods, values for long-chain PFCAs are in the low pg/g to low ng/g range with the highest concentrations being found in fish (or fish offal) and meats.

87. Maternal transfer through cord blood and breastfeeding are sources of long-chain PFCAs for the fetus and for nursing infants/children. Long-chain PFCAs have been detected in umbilical cord blood (Apelberg et al. 2007a, 2007b; Manzano-Salgado et al. 2015; Morello-Frosch et al. 2016), and studies show levels correlate with maternal blood/serum levels, indicating that these substances can cross the placental barrier resulting in *in utero* exposure (Manzano-Salgado et al. 2015; Yang et al. 2016). C9 PFCA has been the most frequently detected in umbilical cord blood/serum with concentrations as high as 2.24 ng/mL in cord serum (Manzano-Salgado et al. 2015). Relatively lower detection frequencies were reported for C10 – C12 PFCAs with a maximum concentration of 1.9 ng/mL (Apelberg et al. 2007a, 2007b; Morello-Frosch et al. 2016). Studies from Europe, Asia and North America have detected C9 – C18 PFCAs in human milk with values typically ranging from below the LOD to low pg/mL (see Table 8 of UNEP/POPS/POPRC.18/INF/x). In addition to being an exposure source for infants, breastfeeding is also an elimination route for mothers. A study of Norwegian women showed that parous women had 62% lower C9 PFCA levels as compared to nulliparous women and that the duration of breastfeeding was associated with decreased levels of C9 PFCA in maternal serum (Brantsaeter et al. 2013). In another study, each month of breastfeeding was associated with a 2% decline in C9 PFCA levels in maternal serum (Mondal et al. 2014).

Long-chain PFCAs have been detected globally in humans. Plasma and serum concentrations 88. reflect an integrated exposure to long-chain PFCAs regardless of the source (Sexton et al. 2004). Much of the biomonitoring data is limited to the measurement of C9 - C14 PFCAs, with C9 PFCA typically having the highest detection frequencies, which are often close to 100%. Some studies have also measured and detected up to C18 PFCAs, however detection frequencies are low (e.g., less than 2%, Nystrom et al. 2022). The results from 29 biomonitoring studies in the EU showed C9 - C11 PFCA serum concentrations to be in the high pg/mL to low ng/mL range, whereas C12 - C14 PFCAs were relatively lower in the pg/mL range (ECHA 2018a). A similar range in values was noted for other larger scale biomonitoring studies in Asia, Australia and North America (see Table 9 of UNEP/POPS/POPRC.18/INF/x). In cycle 2 (2009–2011), cycle 5 (2016–2017) and cycle 6 (2018-2019) of the Canadian Health Measures Survey (CHMS), geometric mean plasma concentrations of C9 - C11 PFCAs ranged from 0.12 to 0.82 µg/L in participants aged 12-79 (Health Canada 2021). Of note, concentrations of long-chain PFCAs in the serum/plasma of Nunavik adults, including pregnant Inuit women (C9 - C11), First Nation Anishinabe youth (C9) and seven Gwich'in and Dene First Nation communities (C9) who live in very different areas across Canada (but all remote) were higher than CHMS values for comparable age and sex groups, and time periods (Caron-Beaudoin et al. 2019; Caron-Beaudoin et al. 2020; AMAP 2021; Garcia-Barrios et al. 2021; Dubeau et al. 2022). Specifically, C9 PFCA geometric mean concentrations among participants from Anishinabe communities aged 6 to 11 and 12 to 19 years old were 9.44 µg/L and 3.01 µg/L, respectively (Caron-Beaudoin et al. 2019). These values are 20 and 7 times higher respectively than CHMS cycle 5 values for the same age groups. Concentrations of C9 PFCA were up to seven times higher in Nunavik adults as compared to CHMS values (AMAP 2021). C9 - C13 PFCAs have also been found in serum samples from Inuit women from Greenland at concentrations ranging from to 0.031 to 38.6 ng/mL (µg/L) (Long et al. 2015; Wielsoe et al. 2017; Hjermitslev et al. 2020), highlighting the significance of the long-range transport of PFAS to remote communities. Importantly, there is also evidence of an association between serum concentrations of long-chain PFCAs in Indigenous populations in these remote communities and biomarkers for the consumption of traditional foods (e.g., marine mammals) (Long et al. 2015; Caron-Beaudoin et al. 2020; Hjermitslev et al. 2020). Serum concentrations of longchain PFCAs have been observed to increase with age, possibly due to a number of factors including continuous exposure since the 1950s, bioaccumulation, relatively long biological half-lives and renal resorption processes (Ji et al. 2012). In some but not all studies, higher concentrations have been observed in older males than females, possibly due to the loss of PFAS through menstruation and the transfer of these pollutants from mothers to offspring via parturition and lactation (Ji et al. 2012; Seo et al. 2018).

89. Occupational exposure can lead to higher serum levels of long-chain PFCAs. In a Swedish study of 8 ski wax technicians, blood levels of C9 - C11 PFCA were all higher in technicians as compared to representative populations from Sweden, China, and North America; C9 PFCA was 15-270 times higher in the ski wax technicians (Nilsson et al. 2010). Further, a significant correlation was found between the number of years in the ski wax profession and serum levels of C9- C13 PFCAs (Freberg et al. 2010; Nilsson et al. 2010). In a study of 86 female firefighters in the USA, firefighters had 1.26 times higher geometric mean concentrations of C9 PFCA (95% CI = 1.01, 1.58) and 1.83 times higher mean concentrations of C11 PFCA (95% CI = 0.97, 3.45) as compared to office workers. Firefighters that worked at the airport had C9 PFCA levels that were two times higher compared to firefighters assigned to other stations (Trowbridge et al. 2020). Other U.S. studies of more than 100 firefighters also found higher levels of C9, C10 and C12 PFCAs in firefighters as compared to levels in the general population as measured in the National Health and Nutrition and Examination Survey (NHANES) (Dobraca et al. 2015; Graber et al. 2021). In contrast to these findings, a study of 38 firefighters in the U.S., noted that levels of C9 and C11 PFCA were significantly lower than the NHANES measurements (Khalil et al. 2020). In a study of eight male firefighters in Finland, levels of C9 PFCA were 0.43-6.69 ng/mL in the firefighters as compared to 0.35-1.66 ng/mL for the general Nordic population (Laitinen et al. 2014).

90. Although serum concentrations of other PFAS such as PFOA and PFOS generally appear to be declining after the 2000s (when their production was phased-out or restricted nationally and internationally) time trends for the long-chain PFCAs have been inconsistent. For example, levels of C9 and C10 PFCAs increased from 1986-2007 in a Norwegian study, whereas levels of C11 PFCA were stable (Berg et al. 2021). In a study of first time mothers in Sweden, levels of C9 PFCA increased from 1996-2008, but then declined until 2019. C11 and C13 PFCAs showed increasing temporal trends during the study period 1996-2019 (Gyllenhammar et al. 2020). Levels of C9 and C10 PFCAs in a cohort of Swedish children also demonstrated downward trends from 2008-2019 (Hedvall

Kallerman et al. 2020). Conversely, a study of a cohort of seniors reported an increase in C9 - C11 PFCAs during 2001-2014 (Stubleski et al 2006). For roughly the same period (2003-2014), data from the U.S. NHANES study showed that levels of C9 and C10 PFCAs decreased (CDC 2018). No overall temporal trends for C9 - C14 PFCAs were observed in German Biobank specimens for the period of 1982-2010 (Shroter-Kermani et al. 2013), although the time period of 2000 to 2009 showed increasing concentrations of C9 - C10 PFCA (Yeung et al. 2013) and new information used to extend the dataset showed a decline in C9 PFCA from 2006 to 2019 (Göckener et al. 2020). Levels of C9, C10 and C11 PFCA in the general Canadian population were declining or stable between 2011 and 2016-2017 (Health Canada, 2021). However, during the same time period, concentrations of C9, C10 and C11 PFCA in Canadian Nunavik pregnant women increased by 19%, 13% and 21%, respectively (Caron-Beaudoin et al. 2020). A systematic review examining the phase out of PFAS worldwide found that, between roughly 1980 and 2013, C9 - C14 PFCAs in humans were generally increasing, with no evidence of significantly declining trends in any global region (Land et al. 2018).

2.4 Hazard assessment for endpoints of concern

91. PFAS, in general, have been shown to activate the peroxisome proliferating receptors (PPARs) in multiple species (Ishibashi et al. 2008b; Hickey et al. 2009; Ishibashi et al. 2011; Kurtz et al. 2019; Routti et al. 2019a). PPAR- α plays a critical physiological role as a lipid sensor and a regulator of lipid metabolism. Within the cytochrome P450 enzymes, the CYP4A family members are integral to several metabolic functions, including detoxifying xenobiotic compounds. PPARs regulate CYP4A expression, which in turn acts as a modulator with other PPAR α target genes involved in lipid homeostasis. Activation of the PPAR α –CYP4A pathway could result in altered liver function, developmental toxicity, immunotoxicity, and feeding disorders (Kurtz et al. 2019; Kubota et al. 2011). C9 and C10 PFCAs have been shown to induce hepatic CYP4A-like proteins via PPAR- α signaling in Lake Baikal seals (Ishibashi et al. 2008b). PPAR- α mRNA expression and C14 PFCAs (Kurtz et al. 2019).

92. In laboratory toxicity studies assessing endpoints such as growth, reproduction, and lethality, long-chain PFCAs (up to C14 PFCA) show low to moderate toxicity depending on species sensitivity. Species tested include pelagic cladoceran (*Daphnia magna*), benthic cladoceran (*Chydorus sphaericus*), rainbow trout, medaka (*Oryzias latipes*), green algae (*Chlorella vulgaris*), diatom (*Skeletonema marinoi*), blue-green algae (*Geitlerinema amphibium*), nematode (*Caenorhabditis elegans*), algae (*Scenedesmus obliquus*) and African clawed frog (*Xenopus laevis*) (Ding et al. 2012, Benninghoff et al. 2011, Ishibashi et al. 2008c, Hoke et al. 2012, Latala et al. 2009, Tominaga et al. 2004, Liu et al. 2008a, Kim et al. 2013). For example, C9 – C12 PFCAs, the 48h EC50 values for immobilization for a pelagic cladoceran (*Daphnia magna*) and a benthic cladoceran (*Chydorus sphaericus*) ranged from 12.4 – 181 mg/L with the benthic cladoceran showing greater sensitivity (Ding et al. 2012). Refer to section 2.4.1 of UNEP/POPS/POPRC.18/INF/x for detailed results.

93. In additional laboratory toxicity studies assessing the exposure to long-chain PFCAs (up to C13 PFCA), endpoints also included developmental effects, behavioural effects, hepatotoxicity, immunotoxicity, neurotoxicity, genotoxicity, changes in gene expression, chemosensitivity and altered thyroid function. Species tested include common cormorant (Phalacrocorax carbo), zebrafish, rainbow trout, African clawed frog, rare minnow (Gobiocypris rarus), mussels (Pema viridis; Mytilus californianus) and chickens (Gallus gallus) (Matsubara et al. 2006; Stevenson et al. 2006; Liu et al. 2008a; Liu et al. 2008b; O'Brien et al. 2009; Wei et al. 2009; Yeung et al. 2009; Nobels et al. 2010; Tichy et al. 2010; Benninghoff et al. 2011; Liu et al. 2011b; Vongphachan et al. 2011; Benninghoff et al. 2012; O'Brien et al. 2013; Zhang et al. 2012a; Zhang et al. 2012b; Zheng et al. 2012; Kim et al. 2013; Ulhaq et al. 2013a; Ulhaq et al. 2013b; Jo et al. 2014; Liu et al. 2014a; Liu et al. 2014b; Yang et al. 2014; Liu et al. 2015; Lu et al. 2015; Gorrochategui et al. 2016; Jantzen et al. 2016a,b; Zhang et al. 2016; Guo et al. 2018; Zhang et al. 2018; Menger et al. 2020; Liu and Gin 2018). For example, embryo-larval zebrafish exposed to C9 PFCA at 0.93 mg/L resulted in altered responses in locomotion and gene expression as well as biochemical and behavioural changes in young adult zebrafish exposed embryonically (Jantzen et al. 2016a; Jantzen et al. 2016b). Refer to section 2.4.1 of UNEP/POPS/POPRC.18/INF/x for detailed results.

94. For the field-based wildlife studies, it is difficult to uniquely distinguish effects from exposure to long-chain PFCAs, as exposures from mixtures of other PFAS (e.g., PFOS or PFOA) and other contaminants cannot be excluded (Knudsen et al. 2007; Letcher et al. 2010; Bourgeon et al. 2017; Liu et al. 2018a; Routti et al. 2019b). PFAS (including related compounds) are also often summed as a group and statistically correlated with the effect observed. Thus, mixtures can be confounding when determining whether a singular substance or group of substances is affecting the health and condition of the wildlife species under investigation. As such, a direct cause-effect correlation is difficult, as

statistical correlations, by themselves, do not imply causal relationships. Recognizing this uncertainty, several field-based wildlife studies have shown statistical correlations with observed effects for longchain PFCA mixtures (from C9 to C16) in various wildlife species, including top predators (Houde et al. 2006b; Erikstad et al. 2009; Peng et al. 2010; Miljeteig et al. 2012; Houde et al. 2013; Aas et al. 2014; Ask 2015; Bustnes et al. 2015; Elliott et al. 2019; Persson and Magnusson 2015; Eggers Pedersen et al. 2016; Blévin et al. 2017; Soloff et al. 2017; Tartu et al. 2017; Bangma et al. 2018; Grønnestad et al. 2018; Lopez-Antia et al. 2019; Briels et al. 2019; Costantini et al. 2019; Groffen et al. 2019; Kurtz et al. 2019; Lasters et al. 2019; Blévin et al. 2020; Guillette et al. 2020; Sun et al. 2020). Refer to section 2.4.1 of UNEP/POPS/POPRC.18/INF/x for detailed results.

Current environmental monitoring data indicate that concentrations for long-chain PFCAs are 95. generally at the nanogram level (ng/g or ng/L) in biota. These concentrations are below the available tested toxicity thresholds, which are generally at the microgram $(\mu g/g)$ or milligram level (mg/L) with varying sensitivity across species. There is a potential for further ecological effects to be caused by mixtures of long-chain PFCAs at environmental concentrations as well as interactions with other environmental stressors, though these effects cannot currently be predicted. There are unique concerns about highly persistent and bioaccumulative substances such as long-chain PFCAs. Long-chain PFCAs are acknowledged to have the potential to cause serious and irreversible impacts to wildlife populations in the long-term due to their persistent nature (MacLeod et al. 2014; Ahrens and Bundschuh 2014). Long-chain PFCAs are persistent and remain in the environment for a very long time, which increases their probability, magnitude and duration of exposure to wildlife. Maternal transfer of long-chain PFCAs has also been demonstrated in wildlife (Houde et al. 2006; Taylor et al. Long-chain PFCAs are also subject to long-range transport, which can also result in regional or global contamination. As such, releases of long-chain PFCAs can lead to elevated concentrations in organisms over wide areas. Long-chain PFCAs may also biomagnify through the food chain, resulting in increased internal concentrations for top predator species. Since they are widespread, several different long-chain PFCAs can be present simultaneously in the tissues of organisms, increasing the likelihood and potential severity of harm. Increasing temporal concentration trends (i.e., doubling times) in wildlife (as discussed earlier in Section 2.3.1), including top predator species, suggest that long-chain PFCAs can approach or exceed toxicity thresholds resulting in harm for wildlife populations in the future.

96. A number of mammalian toxicity studies in animal models are available for assessing the adverse effects of long-chain PFCAs. The most commonly observed effects in animal models include effects on liver, the immune system, on reproductive and developmental endpoints and on the thyroid. Further details on the studies investigating these endpoints are located in Section 2.4.2 of UNEP/POPS/POPRC.18/INF/x. Other effects reported to a lesser extent in animal models include renal, cardiovascular and neurological effects, metabolic disruption, body and organ weight changes, and mortality.

97. In vivo data in rodents provide evidence of hepatotoxicity after acute, short-term and/or subchronic exposure to C9 – C12, C14, C16 and C18 PFCAs. Effects include liver weight alterations, hepatocellular hypertrophy, histopathological changes, alterations in liver gene expression, and clinical chemistry changes (Zhang et al. 2008; Ding et al. 2009; Mertens et al. 2010; Fang et al. 2012a, 2012b, 2012c; Hirata-Koizumi et al. 2012; Takahashi et al. 2014; Fang et al. 2015; Hirata-Koizumi et al. 2015; Kato et al. 2015; Wang et al. 2015a; Frawley et al. 2018; NTP 2019).

98. Effects on the immune system induced by exposure to C9 - C11 PFCAs are reported in rodents after acute, short-term and/or subchronic oral exposure (gavage or drinking water), or after intraperitoneal administration. The effects observed include splenic and thymic atrophy, reduced phagocytic function of macrophages, altered balance of immune cells, and inhibition of cytokine production (Fang et al. 2008, 2009, 2010; Rockwell et al. 2013; Bodin et al. 2016; Rockwell et al. 2017; Frawley et al. 2018; NTP 2019).

99. Several long-chain PFCAs (C9, C11, C12, C14, C16 and C18) have been shown to induce reproductive and developmental toxicity in rodents after short-term and/or subchronic oral exposure (gavage). Effects observed included reproductive organ weight alteration, testicular toxicity, and altered reproductive hormone levels. Developmental effects included postnatal mortality, reduced body weight, and developmental delays (Harris and Birnbaum 1989; Shi et al. 2007; Feng et al. 2009; Lau et al. 2009; Shi et al. 2009; Wolf et al. 2010; Hirata-Koizumi et al. 2012; Rogers et al. 2014; Takahashi et al. 2014; Das et al. 2015; Hirata-Koizumi et al. 2015; Kato et al. 2015; Singh and Singh 2018; Chen et al. 2019; NTP 2019; Singh and Singh 2019a, 2019b, 2019c).

100. Short-term studies performed in rats and mice provide evidence that oral (gavage) exposure to C9, C10 and C14 PFCAs induce altered thyroid weight and histopathological alterations in the thyroid gland as well as changes to thyroid hormone levels (Harris et al. 1989; Fang et al. 2009; Hirata-

Koizumi et al. 2015; NTP 2019).

101. Over 200 epidemiological studies have investigated associations between exposure to longchain PFCAs and various disease incidences or markers of effects. Although some studies have reported null, equivocal or even negative associations with exposure (i.e., protective effects), many studies have established positive associations between exposure to long-chain PFCAs and various health related outcomes. While there are limitations to epidemiological studies, including the fact that the associations identified are not causal in nature, when combined with toxicological data from experimental animals, the findings are more compelling and the overall evidence is strengthened. Endpoints commonly investigated in epidemiological studies include effects on the liver, the immune system, reproduction and development and effects on the thyroid.

102. Several epidemiological studies evaluated hepatic endpoints and noted associations between exposure to C9 - C14 PFCAs and increased levels of serum lipid levels and changes to clinical biomarkers of liver function (e.g., EFSA 2020, ATSDR 2021 Blomberg et al. 2021). With regards to the immune system, epidemiological studies noted positive associations between exposure to C9-C12, C14 PFCAs and the incidence of infectious diseases, alterations of immune marker levels, asthma and allergic diseases (e.g., Dong et al. 2013; Zhu et al. 2016; Chen et al. 2018b; Impinen et al. 2018). The strongest evidence of immunotoxicity comes from investigations into antibody response to vaccines (Grandjean et al. 2012, 2017; Granum et al. 2013, Kielsen et al. 2016; Timmerman et al. 2020, 2022). Several studies evaluated possible associations between exposure to C9 - C14 PFCAs and reproductive outcomes in adolescents/adults. Associations were noted with altered hormone levels, issues related to menstruation, menopause and female reproductive health (e.g., Taylor 2014; Jensen et al. 2015; Tsai et al. 2015; Ding et al. 2020). In terms of developmental endpoints, associations were also observed with birth size, bone development, reproductive outcomes, neurobehavioural and neuropsychological endpoints (e.g., Lind et al. 2016; Kwon et al. 2016; Buck Louis et al. 2018; Vuong et al. 2018a; 2018b). Effects on the thyroid were investigated in relation to C9 – C14 PFCAs and associations were noted with outcomes including the incidence of congenital hypothyroidism and altered levels of hormones, thyroglobulin, and thyroid peroxidase antibodies (e.g., Kim et al. 2016; Ballesteros et al. 2017; Aimuzi et al. 2019; Itoh et al. 2019). Further details on some of the epidemiological studies investigating these endpoints are located in Section 2.4.2 of UNEP/POPS/POPRC.18/INF/x. Comprehensive reviews of the data have concluded that the most convincing evidence exists for associations between exposure to C9 - C10 PFCAs and increased serum lipid levels (ATSDR 2021; EFSA 2020), as well as for associations between C10 PFCA and immune effects (decreased antibody responses to vaccines) (ATSDR 2021; Kirk et al. 2018).

Long-chain PFCAs are commonly detected together with a range of other PFAS in human blood samples. Although little is known about the mixture toxicity of long-chain PFCAs in serum, some studies have investigated synthetic mixtures in an attempt to describe mixture effects. In a cell viability study, human liver cells were exposed to mixtures of nine or eleven individual PFAS, including C9 - C13 PFCAs. Mixtures of nine PFAS (including C9 - C11) that had the same nonmonotonic J-shaped response curves (i.e., response decreases and then increases with increasing concentration), showed synergistic effects. However, mixtures of eleven PFAS (including C9 - C13), which included those with both J-shaped and classical S-shaped response curves (i.e., response increases with increasing concentration) showed only partial addition effects (Hu et al. 2014). Synergistic interactions were also observed in cytotoxicity studies in which human liver cells were exposed to binary, ternary, and multi-component combinations of PFAS (including C9 and C10 PFCAs). Binary mixtures of C9 and C10 PFCAs in particular demonstrated strong synergism under inhibitory concentrations ranging from 10-90% (Ojo et al. 2020). Synergistic effects were also observed when Chinese hamster ovary cells were exposed to a mixture of five PFAS including C9 and C10 PFCA and tested for anti-androgen activity (Kjeldsen and Bonefeld-Jørgensen 2013). Therefore, given the vast number and ubiquity of PFAS, it is reasonable to assume that cumulative effects could occur following exposure to PFAS.

104. Data on the adverse effects of long-chain PFCAs is generally lacking for PFCAs with longer chain lengths (e.g., C15, C17 and C19-21). This is due in part to analytical difficulties in measuring longer chain PFCAs, as discussed earlier. However, predicting the hazard properties of chemicals in the absence of data is a well-established practice and read-across can be used to fill data gaps. Long-chain PFCAs have a high degree of chemical similarity for the series of acids, and existing data show effects on common endpoints. Data from homologues, including the extensively studied C8 PFCA (PFOA), which has been listed under Annex A of the Stockholm Convention, indicates the potential for adverse effects. Furthermore, several studies show that the activity/toxicity of PFCAs can increase with chain length. For example, in vivo studies in aquatic species and mammals indicate that the activity/toxicity of PFCAs tend to increase with chain length up to C12 (Kudo et al. 2006; Ding et al. 2012; Liu et al. 2014a; Das et al. 2015; NTP 2019). In vitro data in mammalian cells indicate a similar

trend of increasing activity/toxicity with increasing chain length up to C18 (e.g., Buhrke et al. 2013; Gorrochategui et al. 2014; Rand et al. 2014; Yang et al. 2017; Lee and Kim 2018; Ojo et al. 2020; Reardon et al. 2021). Therefore, despite the lack of data for some substances, based on read-across, it is expected that all long-chain PFCAs could have similar adverse effects on human health and the environment, although the toxic potency may vary with chain length.

3. Synthesis of information

105. Long-chain PFCAs, their salts and related compounds are used, or may have been used, in a range of applications, including in industrial applications; electronics, medical devices, printing inks and photographic materials; automotive care products; building and construction materials; cookware and food-contact materials; fire-fighting foams; ski waxes; and various other consumer products. In addition, long-chain PFCAs and their related compounds may be unintentionally produced during the manufacturing of PFAS.

106. Information in the public domain on the historic and current production of long-chain PFCAs, their salts and related compounds is limited, and estimated volumes vary between authors. Estimates of the global production of the ammonium salt of C9 PFCA have been reported to be in the range of 15 to 100 tonnes/year for the period between 1975 and 2004. The usage of APFN in Japan, Western Europe and the USA has been estimated to range between 8 and 107 tonnes per year for the years 1975 to 2015. Worldwide production of fluorotelomers (compounds related to LC-PFCAs) was estimated at approximately 9100 tonnes in 2006. Another source estimated or projected the global annual production of fluorotelomer-based products to range between 2500 and 20 000 tonnes for the years 1961 to 2004, and at 45 000 tonnes/year for the period 2005 to 2030. A geographical shift of industrial sources of PFCAs from the USA, Western Europe and Japan to emerging Asian economies, especially China, has been reported in the literature.

107. Long-chain PFCAs are released to the environment from direct (i.e. production of PFCAs and during the life cycle of products containing long-chain PFCAs) and indirect sources (i.e. when compounds related to the long-chain PFCAs emitted to the environment have degraded to long-chain PFCAs). Release of long-chain PFCAs, their salts and related compounds to the environment is documented by their detection in environmental matrices collected in proximity to production facilities and industrial areas; sites impacted by aqueous film-forming foam; wastewater, sludge and leachate from waste treatment facilities; agricultural sites with a history of application of biosolids; snow and soil from skiing areas; and indoor environments.

108. Long-chain PFCAs are persistent in the environment. The carbon-fluorine bond is one of the strongest covalent bonds, and is extremely stable and generally resistant to degradation by acids, bases, oxidants, reductants, photolytic processes, microbes and metabolic processes. The strong carbon-fluorine bond and high density of electron-rich repellent fluorine atoms protect the carbon backbone and result in inertness to both heat and chemical reagents. A number of studies demonstrate that long-chain PFCAs do not degrade under environmentally relevant conditions. For example, C9 PFCA did not biodegrade under the OECD 301F method. Other studies demonstrate some degradation of long-chain PFCAs, but not under environmentally relevant conditions.

109. Some measured BCFs and BAFs greater than 5000 have been reported for C9 - C14 PFCAs in freshwater and marine aquatic organisms. TMFs and BMFs greater than 1 have been reported for C9 - C16 PFCAs in studies that focused on top predator species, providing evidence that long-chain PFCAs biomagnify in air-breathing organisms. PFCAs up to C18 have been measured in top predator species, such as polar bears, herring gulls and peregrine falcons. In humans, long-chain PFCAs accumulate in the blood and well perfused tissues, and are eliminated very slowly from the body (i.e. estimated mean half-lives for C9 PFCA range from 2.5 to 4.3 years, and mean half-lives for both C10 and C11 PFCA range from 4.5 to 12 years). Using a read-across approach on the basis of the high degree of chemical similarity for the series of acids, it is reasonable to expect that long-chain PFCAs of up to 21 carbons have the potential to bioaccumulate in aquatic and terrestrial organisms, and in humans.

110. Global modelling indicates that long-chain PFCAs, their salts and/or related compounds have the potential to be transported over long distances. In addition, C9 - C18 PFCAs have been measured in environmental matrices, biota and human populations from remote sites, such as the Arctic and the Antarctic, indicating that long-chain PFCAs have the potential for long-range environmental transport. Furthermore, increasing temporal concentration trends in polar bears from remote regions have been reported. Compounds related to long-chain PFCAs have also been measured in ambient air from various regions around the world, including in remote areas. Available research indicates that the presence of long-chain PFCAs in remote areas results from the atmospheric and oceanic transport of volatile precursors and/or the acids themselves. There is empirical evidence of the presence of long-

chain PFCAs up to C18 in locations distant from sources. Long-chain PFCAs of up to 21 carbons may also be expected to be present in remote environments as a result of the release of compounds related to long-chain PFCAs during their production and use in many applications, and the potential for these precursors to undergo long-range environmental transport.

111. Long-chain PFCAs are detected globally, in all continents as well as in all environmental compartments, including biota, freshwater and saltwater, sediment, soil and rainwater. Increasing temporal trends for long-chain PFCAs (up to C15 PFCA) have been reported in wildlife, including in top predator species. In humans, C9 – C18 PFCAs have been detected globally in various tissues and fluids. Exposure of the general population to long-chain PFCAs and their related products may take place through exposure to indoor dust, food, drinking water, indoor/outdoor air and consumer products; however, the relative importance of each of these pathways for the general population remains unclear. Maternal transfer through cord blood and breastfeeding are sources of long-chain PFCAs for the fetus and for nursing infants/children. Occupational exposure to certain workers (e.g. firefighters, ski wax technicians) can lead to higher serum levels of long-chain PFCAs.

Laboratory studies of ecological endpoints demonstrated developmental effects, behavioural effects, hepatotoxicity, immunotoxicity, neurotoxicity, changes in gene expression, genotoxicity and altered thyroid hormones. In addition, vitellogenin induction has occurred in juvenile rainbow trout after dietary exposure to C9 - C11 PFCAs. Toxicological and epidemiological evidence indicates that long-chain PFCAs are associated with adverse effects in humans, including hepatotoxicity, developmental/reproductive toxicity, immunotoxicity and thyroid toxicity. Further ecological effects of long-chain PFCAs may be possible but cannot yet be predicted by current science because the interactions of long-chain PFCAs in mixtures or with other environmental stressors is not fully understood. Data on the adverse effects of long-chain PFCAs is generally lacking for PFCAs with longer chain lengths (e.g., C15, C17 and C19-21). However, read-across can be used to fill data gaps. Long-chain PFCAs have a high degree of chemical similarity for the series of acids, and existing data show effects on common endpoints. Data from homologues, including the extensively studied C8 PFCA (PFOA), indicates the potential for adverse effects. Furthermore, several studies show that the activity/toxicity of PFCAs can increase with chain length. Therefore, it is expected that all long-chain PFCAs would have similar adverse effects on human health and the environment, although the toxic potency may vary with chain length.

113. Long-chain PFCAs are persistent and remain in the environment for a very long time, which increases their probability, magnitude and duration of exposure to wildlife. Long-chain PFCAs are also subject to long-range transport, which can also result in regional or global contamination. As such, releases of long-chain PFCAs can lead to elevated concentrations in organisms over wide areas. Long-chain PFCAs may also biomagnify through the food chain, resulting in increased concentrations for top predator species. Since they are widespread, several different long-chain PFCAs can be present simultaneously in the tissues of organisms, increasing the likelihood and potential severity of harm. Increasing temporal concentration trends in wildlife, including top predator species, suggest that long-chain PFCAs can approach toxicity thresholds resulting in harm for wildlife populations in the future. In humans, the reported temporal concentration trends for the long-chain PFCAs have been inconsistent. However, concentrations of certain long-chain PFCAs have been reported to increase in Canadian Nunavik pregnant women between 2011 and 2016-2017, while levels of these PFCAs were declining or stable in the general Canadian population. This suggests that certain populations are at risk of greater exposure to long-chain PFCAs.

4. Concluding statement

114. Due to the ongoing use of long-chain PFCAs, their salts and compounds related to PFCAs, long-chain PFCAs are directly or indirectly emitted into the environment from human activities. Long-chain PFCAs are globally ubiquitous in environmental compartments, including biota, freshwater and saltwater, sediment, soil and rainwater, and humans. Long-chain PFCAs are persistent, bioaccumulative, have evidence of adverse effects to human health and/or the environment, and have the potential to undergo long-range environmental transport, in part due to the long-range atmospheric transport of compounds related to long-chain PFCAs. Therefore, it is concluded that long-chain PFCAs, their salts and related compounds are likely, as a result of their long-range environmental transport, to lead to adverse human health and/or environmental effects such that global action is warranted.

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