

PFAS Subgroup ENGO members' Proposed Scenario for PFAS reporting to NPRI

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Bases of our Scenario:

NPRI Community Right to Know on PFAS requires comprehensive reporting, particular for those communities that face elevated risks associated with PFAS exposure.

Health impacts associated with PFAS exposure include: altered immune and thyroid function, liver and kidney diseases and impacts to reproductive and developmental system (including delays in onset of puberty in girls) and increase in risk of certain cancers such as breast and thyroid.

All PFAS are extremely persistent, or will partially transform into extremely persistent PFAS and will remain in the environment for hundreds if not thousands of years.

Due to their mobility in water and ability to circulate in air, PFAS are ubiquitous contaminants in the Canadian environment, as described in the Government of Canada's Draft State of Per- and polyfluoroalkyl substances (PFAS) Report of May 20, 2023.

PFAS are used and/or present and/or released or transferred from a very wide range of facilities. See Memo: Adding PFAS Sources to Canada's National Pollutant Release Inventory, dated October 23, 2024, prepared for NGO members of the PFAS Subgroup and submitted to NPRI for PFAS Subgroup)

For these reasons, we have concluded that reporting of PFAS to NPRI should be comprehensive.

Our Scenario's Characteristics:

1) **All facilities, all sectors and all activities** should be required to report PFAS releases and transfers to NPRI. This should include removing current exemptions from NPRI reporting such as hydraulic fracturing.

2) **PFAS should be reported as a class:**

- It should capture any potential PFAS in waste streams as well as releases or transfers, account for transformation, and could track substitutions as risk management actions are implemented.

- Report PFAS as a class, in keeping with OECD definition for PFAS, but also include US EPA CompTox CAS RNs (15,994 PFAS) (PFASSTRUCTV5 - August 2022 and PFASDEV2 - August 2021). OECD definition/list of PFAS has not been updated recently.
- Measure Total PFAS - Use Total Fluorine not Total Organic Fluorine in order to capture long and short chain PFAS, and also account for PFAS that volatilize into the air

Additional consideration:

- There is added value to report on releases, disposals, transfer data for specific PFAS as has been done before in NPRI (e.g. VOCs and PAHs) as well as to the addition of the PFAS as a class as a whole (starting reference for individual PFAS : Class Approach scenario by ECCC, slide 17 presentation)

3) Thresholds:

Current NPRI thresholds are not appropriate for reporting on PFAS as a class because it would severely reduce the reporting and very low levels of PFAS matter.

There should be:

- No concentration threshold
- No MPO or releases thresholds
- No employee threshold

4) Testing:

- The Government should adopt a standardize method for Total Fluorine testing to be used by facilities in reporting to NPRI on PFAS as a class.
- We cannot and should not rely on Safety Data Sheets (SDS) for reporting under NPRI because of their substantial limitations.

5) Pollution Prevention Reporting under NPRI:

Pollution prevention reporting under NPRI should have the following PFAS specific questions:

- Pollution Prevention actions for PFAS should be reported separately from pollution control actions.
- Because of the nature of PFAS, substitution of PFAS by another substance should not be considered Pollution Prevention unless the material it was replaced with is not a member of the broad PFAS class.
- Providing answers to these questions to NPRI should be required for PFAS.