29581 - ENVIRONMENTAL RISK ASSESSMENT SERVICES FRAMEWORK (ERAS2) - PROJECT FORM
Part 1 – to be completed by Environment Agency Project Manager

Project title: Socio-economic scoping for UK REACH restriction to the manufacture, import, marketing or use of perfluoro- and polyfluoroalkyl substances (PFAS) in dispersive uses other than Fire-Fighting Foams

Atamis project ref (if applicable): C20582

Date: 22/09/2023

Contracting Authority (Environment Agency; Natural England; Defra etc)	Environment Agency		
Environment Agency Project Manager/Technical Lead:	[redacted]	**Phone number:**	[redacted]
Budget holder:	[redacted]	**Cost code:**	[redacted]
Procurement Contact (if over £50k):	N/A	**Email:**	[redacted]
Project Start Date		29/09/2023	
Project Completion Date		28/02/2024	
For any projects over £10k, full competition is required (i.e. all suppliers on the Lot invited to quote). Please tick	**Direct Award**		**Mini-comp** Lot 2
Proposal return date: ***(no less than 10 working days from current date)***			

Notes	Any extensions, or amendments to existing orders need to be discussed with the contract manager first and the table in section 6 completed to authorise the change to the contractor. A **Prior Rights Schedule** to record data being shared between parties and a **GDPR Schedule** (if personal data is being handled as part of the project) must be completed with the successful contractor at contract start up and updated throughout the project and held as part of the contract record.

Evaluation criteria: (for work over £10k project managers need to prepare and complete an evaluation model on receipt of tender submissions – see guidance notes). **Please note price and quality weightings are fixed (although you may alter the quality sub-criteria weightings**).
Optional: If a **minimum score threshold** is set for any criteria this must be stated in the table. If not used, please delete the wording.

Consultants: Failure to meet the minimum score threshold stated will result in the bid being removed from the process with no further evaluation regardless of other quality or price scores.

Price	**Weighting**	**40%**
Quality	**Weighting**	**60%**
Quality Sub-Criteria Weightings:		

Approach & Methodology *(minimum score threshold 4 will apply)* • Clearly set out the proposed approach and methodology for delivering the full scope of each of the main components of work. Include technical detail where appropriate on methodologies and robustness of approach. Justify the proposed approach by explaining why the methods proposed are the most suitable. • Please highlight any alternatives with reasons/benefits of using those alternatives. • Describe H&S considerations you would take, including any Covid-related measures. Note that H&S assessments should not be submitted with the quote: these will only be requested from the successful contractor at the commencement of the contract. • Describe sustainability principles relevant to this contract. • Demonstrate an understanding of what EA is trying to achieve through this contract.		**40**
Proposed Staff (inc CV's) *(minimum score threshold 4 will apply)* Please provide details of the key staff to be used for the project, their experience of undertaking similar work and any relevant qualifications they hold. Your reply should contain a short pen portrait to evidence the relevant experience, skills and qualification for each key member of the project team. The information provided should evidence the following skills: • Project Management • Economic appraisal, namely social cost-benefit & cost-effectiveness analysis. • Targeted and relevant gathering of evidence via literature search • Stakeholder identification and engagement • Report writing in preparation for regulatory guidance Desirable- experience of the following: • Economic appraisal of PFAS, persistent, bioaccumulative and toxic (PBT), very Persistent, very Bioaccumulative (vPvB) substances. • REACH (UK or EU)		**30**
Project Management (including project plan) *(minimum score threshold 4 will apply)* Please provide details of your company's experience of successfully undertaking similar projects. • Please provide details on how the project will be managed that evidences a planned approach, identification and mitigation of key project risks and the ability to deliver high quality outputs within the required timeframes. • Your reply should include an overview of the quality assurance procedures you will apply to the project. • Your reply should also give an overview of your approach to risk identification and management. • If you are using sub-contractors to deliver key elements of the project, please advise how they will be managed. • Please provide your approach to delivering and managing key milestones and deliverables.		***30***

Specification (Details to be provided by the Environment Agency project manager. ***Note*** *– the contractor's proposal will be limited to* ***5 pages*** *(excluding pen portraits and costs) unless otherwise indicated in your specification.* ***Please also detail the Contractor's required Limitation of Liability.***

Please detail the Contractor's required Limitation of Liability. If no sum is stated, the Contract Price for the Services performed or to be performed under the Contract or five million pounds whichever is the greater will apply.

1. Description of work required – overall purpose & scope

Background & aim

Following the publication of the UK REACH (UK Registration, Evaluation, Authorisation and Restriction of Chemicals) Regulatory Management Options Analysis (RMOA) for Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)[1] we are considering the case for restriction of certain uses of PFAS. This project specifically concerns **dispersive uses** of PFAS that could lead to the contamination of surface water, groundwater, soils or biota (including humans). Examples of dispersive PFAS uses include in fire-fighting foams, drilling fluids, paints, varnishes, coatings on textiles, upholstery, leather, apparel and carpets and cosmetics. The Environment Agency has already commissioned a report on fire-fighting foams[2] so this use is **excluded** from this project. A second report[3] conducted a brief review of socio-economic considerations around some other dispersive uses. This project is to expand on this initial review for a defined set of dispersive uses that are relevant to GB and that may be considered for restriction.

UK REACH legislation requires that the UK Chemicals Agency undertakes a socio-economic analysis/impact assessment (SEA) to thoroughly investigate the estimated societal impacts of the restriction. This SEA is subject to independent expert scrutiny and public consultation. **We are seeking a contractor to construct a database necessary for such an SEA.** This will draw on publicly available data, such as the UK REACH RMOA, and an extensive stakeholder evidence gathering exercise conducted by the contractor.

Approach

When the UK exited the European Union (EU), it retained much of the EU's REACH legislation, including the requirement for a full SEA when restricting a substance. As such, the European Chemicals Agency's guidance on SEA can provide an outline on what is required. We have also recently published two Annex 15 restriction proposals as part of a public consultation. They can be found here and here, and provide a good example of what is expected from a consultation impact assessment. The database constructed by the contractor would be used by the Agency to produce a similar impact assessment. A restriction proposal on dispersive professional and consumer uses of PFAS would need a similarly detailed SEA.

The dispersive uses that are in scope of this project are:

Surface coatings (including packaging)

Paints, printing inks and varnishes

Coatings on textiles, upholstery, leather, apparel and carpets (TULAC)

Cleaning agents, varnishes, polishes and waxes

Lubricants

[1] HSE (2023) Analysis of the most appropriate regulatory management options (RMOA) https://www.hse.gov.uk/reach/assets/docs/pfas-rmoa.pdf

[2] Environment Agency (2023) Unpublished report "Socio-economic analysis of applying a UK REACH restriction on PFAS in firefighting foams",

[3] Environment Agency (2023) Unpublished report "Socio-economic analysis of applying a UK REACH restriction on PFAS in certain diffuse uses"

Drilling fluids and mining

Cosmetics

Personal protective equipment

The following PFAS groups and/or uses are outside of this requirements scope:

Non-dispersive uses, including use as intermediates, in sealed/contained systems, and as fluoroplastic or fluoroelastomer articles or as components of articles;

Fluorinated greenhouse gases, or PFAS that could come within scope of the F-gas regulations;

Medicines and medical devices, veterinary medicines, biocides, and plant protection products;

Firefighting foams.

We advise that the contractor follow the steps below:

1) Identify and engage with relevant stakeholders including suppliers, users or trade organisations, in addition to gathering any relevant publicly available evidence, in order to collate GB specific information. This should include information on uses, tonnages and types of PFAS used for each application, potential alternatives and timescales, voluntary measures to reduce PFAS use and any data that could be used to estimate the costs to industry of transition away from PFAS.
2) This information should be collated into an excel database. The contractor should explain in detail how they will approach this, the minimum and targeted number of stakeholders for each in scope use listed above, the methods they will use and how they will mitigate risks to the project if stakeholders do not engage with this work. Clear assessment of the robustness of this evidence should be demonstrated.

The evidence base should be constructed such that the Agency is able to further pursue data sources where necessary as it investigates the case for restriction on each use.

Deliverables and timeline:

We are aiming for project commencement in XX 2023. The contractor will produce a draft report by XX 2024. The Environment Agency will comment on the report within 2 to 3 weeks. The contractor would need to produce the final analysis by mid-February 2024. Regular meetings will be scheduled within this time-period, with the timing to be decided by the Environment Agency and the contractor during the start-up meeting.

2. Required skills / experience from the Framework contractor

Essential - experience of the following**:**

- Stakeholder identification and engagement
- Economic appraisal, namely social cost-benefit & cost-effectiveness analysis.
- Targeted and relevant gathering of evidence via literature search
- Report writing in preparation for regulatory application

Desirable - experience of the following:

- Economic appraisal of PFAS or PBT/vPvB substances.
- REACH (UK or EU)

3. Proposed programme of work and payment table (Detailing specific tasks, deliverables & completion date where appropriate) Payment schedule should detail the % amount that will be paid after delivery of each task (*We always hold back a minimum of 30% until the project is complete*)

Task no.	Task and deliverable	Completion date
1	Contract Award	22/09/2023
2	Start up meeting	TBC
3	1st Progress meeting	TBC
4	2nd Progress meeting	TBC
5	Approval of draft product/database by Project Executive	31/01/2024
6	Progress meeting to discuss comments	TBC
7	Approval of Final product/database by Project Executive	28/02/2024

29581 - ENVIRONMENTAL RISK ASSESSMENT SERVICES FRAMEWORK (ERAS2)
TASK QUOTATION SHEET
Part 2 – to be completed by Framework Consultant Project Manager

Framework Consultancy name			
Consultant Project Manager name			
Consultant project manager phone number:		**Consultant project manager e-mail address:**	

Part 2 - Consultant Proposal (details to be provided by the Contractor)
(to include methodology, work programme, staff details (including relevant pen portraits) Limit to 3 sides of A4, excluding pen portraits and costs (unless otherwise indicated in Environment Agency project client's specification)

1. Approach & Methodology

Background
The Environment Agency (EA) are considering preparing a restriction proposal for certain dispersive uses of Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS). PFAS have been identified as a priority in the UK based on recommendations from the UK REACH Risk Management Options Analysis (RMOA). The EA commissioned a report on PFAS in fire-fighting foams and a separate report conducting a brief review of socio-economic considerations concerning other dispersive uses of PFAS. This project will build on this initial review, focusing on a defined set of dispersive uses relevant to Great Britain.

Objective and scope
The objective of this project is to construct a database with information necessary for a socio-economic assessment (SEA) for a potential UK REACH restriction on the use of PFAS in the following 8 dispersive uses: (i) surface coatings (including packaging), (ii) paints, printing inks and varnishes, (iii) coatings on textiles, upholstery, leader, apparel and carpets (TULAC), (iv) cleaning agents, varnishes, polishes and waxes, (v) lubricants, (vi) drilling fluids and mining, (vii) cosmetics and (viii) personal protective equipment. An SEA, and hence the database, needs to cover the following topics: Baseline, Analysis of Alternatives, Impacts (economic, human health and environmental). Considering the large number of PFAS (~15,000 chemicals[4]), it is suggested that the PFAS are grouped (e.g., fluoropolymers; fluoroelastomers[5] etc.) for the purpose of this data gathering, which can be discussed at the start-up meeting.

Approach and method
Task 1: Inception: The project will be initiated with a start-up meeting. Key aspects to be covered in the meeting are understanding and agreement of the project scope, approach, timeline, database format and communication.

Task 2: Questionnaire development: We will develop a questionnaire to send to stakeholders aiming to collect information needed for developing a full SEA. Development of the questionnaire requires consideration of how the data will be used in the baseline and restriction scenarios of an SEA and in an analysis of alternatives. The project team has extensive experience in SEAs, including a number of PFAS-specific SEAs, and will use this experience in the questionnaire development.

For each of the eight uses in scope, information will be collected on (list of information requirements non-exhaustive):
- Baseline scenario: quantities (i.e., tonnages) of PFAS manufactured, imported, used and recycled; types 'sub-uses' or products manufactured using PFAS; revenue and profits from sales of PFAS and PFAS-containing products; market size and projections; employment data; PFAS emissions from production, use and waste management (including recycling); potential occupational exposure and associated risk management measures (RMMs); discharges to the environment and associated RMMs; and voluntary measures to reduce PFAS use.
- Analysis of alternatives: potential alternatives to PFAS (e.g., drop-in or functional substitutes); substitution steps and timescales; R&D carried out to identify alternatives; costs of developing, testing and using alternatives (e.g., cost of alternative substance, change in operating costs from alternative, recertification costs etc.).

[4] NIH (2023) Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS). Available here.
[5] A comprehensive list of PFAS groups is provided by the OECD. Available at: https://one.oecd.org/document/env/cbc/mono(2022)1/en/pdf

- Impacts: Behavioural responses to a restriction (e.g., substitution, closure of production lines and or relocation), additional costs associated with the behavioural responses (e.g., relocation or remediation costs).

Questionnaire design is crucial to any subsequent data processing and analysis. A key aspect is that it must be possible to combine data in a meaningful way. To facilitate this, data will be collected according to key variables, such as the uses and types of PFAS. This will allow EA to aggregate data based on these variables, e.g., volumes and market value associated with a specific type of PFAS in a specific use.

To increase the response rate, it is important to minimise the cognitive burden on respondents as much as possible. This can be done in a number of ways, including: (1) utilise multiple choice or drop-down options, (2) minimising the overall number of questions by asking questions that can be used in further analysis (e.g., unit values, shares instead of absolute number, etc.), (3) automatically populating subsequent questions based on responses to previous questions, and (4) informing the respondent about expertise needed to input into parts of the questionnaire. It is also believed that collecting data by PFAS category would be more effective and less onerous for respondents and therefore could increase the response rate and the quality of the responses.

Task 3: Stakeholder engagement: This will involve identification of relevant stakeholders, where the first step will be to identify key industry associations within the eight uses in scope. It is envisaged that the associations will distribute the questionnaire to their members, which, based on previous experience, will result in a higher response rate than if individual companies are contacted directly. This process will be carried out in parallel with the questionnaire development.

Note that a minimum of three stakeholder responses per question will be needed in order to ensure confidentiality in reporting and to enable aggregation of data. Reminders will be sent to stakeholders in order to maximise the number of questionnaire responses received. As detailed above, the questionnaire will be designed to minimise the burden placed on respondents in order to aid higher response rates. If fewer than three responses are received, the data will not be aggregated and used in the user-facing database (see Task 5 for a description of the database), but will still be provided as confidential raw data to the EA.

The responses to the stakeholder questionnaire will be reviewed and validated against information found through desk-based research (see Task 4), and follow-up questions will be sent directly to the respondents. Interviews will also be conducted with key stakeholders (up to a maximum of 10 interviews), to obtain more detailed information and increase the understanding of the data. These two approaches will increase the completeness and robustness of the data collected, as the additional layer of review ensures that there are no anomalies and that the responses are fully understood.

Task 4: Desk-based research: We will map out available information and sources in the RMOA provided by the EA as well as the call for evidence summary reports and the public consultation carried out in relation to the EU REACH PFAS restriction proposal. It is also anticipated that the EA's unpublished SEAs of applying a UK REACH restriction on PFAS in firefighting foams[6] and certain diffuse uses[7] will provide further sources and information that can be utilised.

UK government data held by the HSE, EA, BEIS, and the Office of National Statistics (ONS)) may also be relevant for the database. If EA would like for confidential data to be included (e.g., UK REACH registration data), a discussion will be held as to whether additional data security measures must be put in place to maintain confidentiality when integrated into the database. Other sources such as PRODCOM (which has data at Member State level including the UK) will also be useful for gathering historic market data.

Desk-based research will be conducted in parallel with the stakeholder engagement and is intended to complement the desired outputs of the database. The evidence collected can also be used to validate stakeholder responses and to fill potential data gaps if insufficient information is received in the stakeholder consultation.

Task 5: Database development: The database will be Excel-based and comprise several tabs, including: an overview of the database, raw data from the questionnaires and the desk-based research, look-up tables for qualitative and quantitative data and user-tailored pivot tables. The overview tab will provide a brief description on the purpose of the database, an explanation of the variables included in the database, and a brief user-guide.

The tab presenting the raw questionnaire data will include all stakeholder data in a table format with each row representing an individual respondent and each column representing the responses to the questions asked in the questionnaire. Each row will have a unique respondent identifier and each column will have a unique question

[6] Environment Agency (2023) Unpublished report "Socio-economic analysis of applying a UK REACH restriction on PFAS in firefighting foams"
[7] Environment Agency (2023) Unpublished report "Socio-economic analysis of applying a UK REACH restriction on PFAS in certain diffuse uses"

identifier. This data structure provides ease of use for further data analysis in Excel or for importing data into other programming languages, such as Python and R. The raw data in the database will have been cleaned and will therefore include any of the necessary changes to the data once issues have been clarified with stakeholders.

The look-up table tabs will collate and organise the data that has been gathered. Structured data (e.g., quantitative data and information from drop-down or multiple-choice questions) will be presented in separate tables from qualitative (less structured) information (e.g., description of alternatives and information from other open text questions). This is to increase the usability of the look-up tables; in particular, it will allow for more functionality to be included for the structured data. However, all tables will be possible to filter by key variables, such uses and types of PFAS. It is suggested that data from external sources and from the stakeholder survey is presented in separate look-up tables, as the data found in external sources may not be directly comparable (e.g., volumes may be for different years, uses may not fully correspond, geographical areas may differ etc.). It is envisaged that four look-up tables will be created; namely (1) Desk-based research - structured data, (2) Desk-based research - qualitative data, (3) Stakeholder consultation - structured data, (4) Stakeholder consultation - qualitative data.

A brief user-guide, in the form of a PowerPoint presentation, will be provided alongside the database, to provide step-by-step guidance on how to use the look-up and pivot tables. This will be presented and discussed at the draft database meeting and the materials will be provided to the EA.

2.Project Management (inc Project plan)

[redacted]

[redacted]

3. Proposed Staff who will do the work and briefly state previous relevant experience

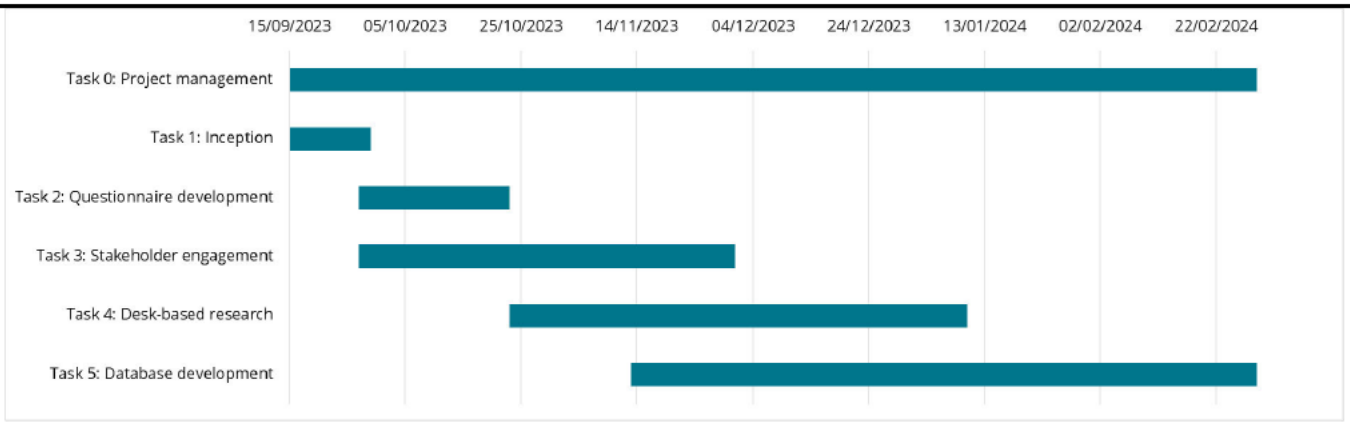
The project will be managed by initially establishing the fundamental project management structure and logistics o the project. Different team members have clear roles and responsibilities, which ensures that no one person is over- loaded and eases coordination across the project team. We will use an excel based project management file fo tracking progress of activities and deadlines, which is an internally developed tool that has been successfully applied for years. The project team will be organised as follows:


[redacted]

wca and eftec have long-proven track records of successfully supporting the EA and Defra on numerous projects concerned with risk assessment and socio-economic analysis; we have also worked together on several restriction appraisals for ECHA. To ensure that the lead (eftec) and subcontractor (wca) coordinate effectively, responsibilities and expectations will be defined prior to the start of the project. Fortnightly team meetings will be arranged to discuss any issues as they arise. Data sharing platforms, such as SharePoint, will be set up to ensure that both teams have access to the necessary information.

All project outputs will be reviewed internally before submission to the EA to ensure the quality of outputs. Thea Sletten (Director) will be the Quality Assurer reviewing all project outputs, following internal quality assurance guidance for analysis and reporting.

It is anticipated that the project will begin the 15th September 2023 and will be completed by 29th February 2024. Questionnaire development will commence immediately after the kick-off at the end of September. The fina questionnaire will be sent to stakeholders in w/c 23rd October. Identification of relevant stakeholder will happen in parallel with the development of the questionnaire. Stakeholders will be asked to respond to the questionnaire by 13th November. These project milestones have been set to allow enough time for the development of the database, taking into consideration Christmas holidays, to ensure that the draft database can be delivered by the 26th January. Follow- up engagement with stakeholders will take place as responses to the questionnaire are received, i.e., if any responses are received early, follow-up will be initiated early for these stakeholders. It is envisaged that interviews will be completed by the 1st December. Desk-based research will be undertaken whilst stakeholders respond to the questionnaire. Data cleaning and the development of the draft database will be carried out between December and late January. The following Gannt chart shows the timeline of the project.



To ensure that the final database is fit for purpose, regular communication with the EA will be important. It is proposed that a short meeting (15-30 min) is held every two weeks to discuss project progress and any issues that may arise with longer progress meetings set up periodically. The milestones and meetings are detailed below, alongside the indicative timing.

Indicative timing of project milestones

Milestones	Indicative timing
Project start	15-Sep
Start-up meeting	22-27 Sep
Questionnaire sent to stakeholders	23-Oct
Deadline for questionnaire response from stakeholders	13-Nov
Deadline for interviews	01-Dec
Deadline for draft report	26-Jan
Draft database meeting	12-Feb
Deadline for final report	29-Feb
Project end	29-Feb

As with all projects we undertake, there is some inherent risk involved, and we have a risk management process by which to identify and mitigate potential risks. Should any significant risks arise during the project, the Project Manager will address these with involvement of the Technical lead and the Project Director. If it still cannot be mitigated, it will be discussed with the EA. The following table present the most relevant risks identified in relation to this project.

Project risk register

Risk	Likelihood	Impact	Control measures	Residual impact
Misunderstanding of aims and objectives	Low	Med	The start-up meeting will include a discussion of the initial scope of the project, our approach and how these meet the requirements. Progress meetings will assure scope continues to be appropriate and will highlight any changes in the scope. Extensive experience within the project team in developing SEAs for regulatory purposes also reduces the risk of misunderstanding the objectives of the aims of the project and the data required for subsequent development of a full SEA.	Low
Delivery to constrained timeline	Med	Med	The project will be managed closely to ensure the timeline is kept and EA will be provided with progress updates. The project timeline has taken into consideration holidays (both in the project delivery team and stakeholders) during the festive holidays. We operate a shadowing management system with a nominated stand-in project manager in case of staff absence. Additional resources will be on hand should capacity become constrained.	Med
Insufficient responses to the stakeholder questionnaire	High	High	Desk-based research will allow for data gaps from stakeholder consultation to be filled with information found in the public domain, which can be used in a subsequent SEA. The questionnaire will be devised to minimise the cognitive burden on respondents which will encourage a greater number of responses. Reminders to complete the questionnaire will be sent to stakeholders to encourage further participation. If an insufficient number of responses to the questionnaire are received, the deadline for responding to the questionnaire could be extended by a week, although this will reduce the time available for other project tasks.	Med
Issues with availability of stakeholders for interview	Med	Med	We will immediately begin identifying interviewees as responses to the questionnaire are provided, allowing time to identify second choice interviewees if first choices are unavailable.	Low

4. Proposal cost

Please use day rates, including any applicable discounts, as agreed under the framework contract.

[redacted]

5.-Terms & Conditions

Note to contractor – All call off contracts under the ERAS2 Framework are subject to the terms and conditions issued with the framework, including the Prior Rights Schedule and GDPR Schedule completed at award of the call-off contract.

Notes	You must have a purchase order number from the EA project manager before you start any work in connection with this proposal.
Contractor Project Manager:	
Signature :	
Date:	

6. Proposal Acceptance

Notes	All agreed post submission amendments to scope, proposal, timetable or costs must be updated prior to accepting the proposal. Atamis ECM reference should be obtained from Commercial if the project has been issued by Atamis and quoted on your purchase order.

Authorisation	**Name**	**Signature**	**Date**
Contract Project Manager	[redacted]	[redacted]	**22/09/23**
Supplier_			
Authority_			

ATAMIS Ref (if applicable)	C20582

7. Change Control **All amendments to scope, timetable or costs must be submitted to and approved by the PM Prior to implementing the change.**			
Change Details	**Revised completion date (if applicable)**	**Revised Cost (if applicable**	**Approved by EA PM / Date**