

From: [REDACTED] (GROW)
Sent: mardi 8 septembre 2020 17:22
To: [REDACTED]
Cc: [REDACTED]; [REDACTED] (GROW); GROW D1; [REDACTED] (ENV); [REDACTED] (GROW)
Subject: RE: Follow-up: ATCS - Meeting request to discuss PFHxA restriction proposal and CfE all PFAS

Dear [REDACTED]

Thank you very much for contacting us about a meeting request to discuss the PFHxA restriction proposal on behalf of the Alliance for Telomer Chemistry Stewardship.

In the past, your colleagues have also requested to discuss this restriction on behalf of other companies too (eg. Swatch, AGC, Daikin).

We have replied to you the following:

At this stage of the restriction process, the Commission plays an observer role. Stakeholders can submit their contribution to the public consultation on the restriction dossier. Further discussion will take place in RAC and SEAC in order to assess and elaborate the restriction dossier, and also on these occasions stakeholders can contribute.

I know that you are aware that we are at the process of the ECHA opinion development. More specific, the first public consultation for the PFHxA has started on 25/3/2020 and is going to finish on the 25/9/2020.

There will be a second public consultation on the SEAC draft opinion, which will look also at derogations. The full analysis will be reflected in the committees' opinions, that ECHA will send to the Commission next year. Only at that point the Commission will become the main actor in the regulatory procedure.

For these reasons, we do not find that a meeting at this specific point in time would be convenient.

Kind Regards

[REDACTED]



European Commission
DG for Internal Market, Industry, Entrepreneurship and SMEs REACH

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From: [REDACTED]@kreab.com>
Sent: Tuesday, September 8, 2020 4:06 PM
To: [REDACTED] (GROW) [REDACTED]@ec.europa.eu>; [REDACTED] (GROW)
[REDACTED]@ec.europa.eu>; GROW D1 <GROW-D1@ec.europa.eu> Cc [REDACTED]
[REDACTED]@kreab.com>
Subject: FW: Follow-up: ATCS - Meeting request to discuss PFHxA restriction proposal and CfE all PFAS

Dear [REDACTED], dear [REDACTED]

I am writing to follow up on the meeting request we have sent on 6 August on behalf of the **Alliance for Telomer Chemistry Stewardship** (see below). We are contacting you concerning **the [proposal for a restriction of PFHxA, its salts and related substances](#) under the REACH Regulation, as well as the forthcoming Restriction on all PFAS.**

We would like to reiterate that we would appreciate to have the opportunity to discuss these matters with you and that we would be **available for a call at your earliest convenience.**

In the meantime, please do not hesitate to contact me if you have any questions or would like any additional information.

Thank you in advance for your consideration.

Yours sincerely,

[REDACTED]



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EU Transparency Register ID Number: 1078390517-54

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From: [REDACTED]
Sent: 26 August 2020 09:25
To: [REDACTED]@ec.europa.eu; [REDACTED]@ec.europa.eu>;
[REDACTED]@ec.europa.eu; 'GROW-D1@ec.europa.eu' <GROW-D1@ec.europa.eu>
Cc: [REDACTED]@kreab.com>; [REDACTED]
<[REDACTED]@kreab.com>
Subject: Follow-up: ATCS - Meeting request to discuss PFHxA restriction proposal and CfE all PFAS

Dear [REDACTED], dear [REDACTED],

We hope this email finds you well.

I am writing to follow up on the meeting request we have sent on 6 August on behalf of the **Alliance for Telomer Chemistry Stewardship** (see below). We are contacting you concerning **the [proposal for a restriction of PFHxA, its salts and related substances](#) under the REACH Regulation, as well as the forthcoming Restriction on all PFAS.**

We understand that there are severe restrictions in place due to COVID-19 all across Europe and that this situation hampers the possibility to arrange a date for the meeting. For that reason, we wanted to reiterate that we would be **available for a call at your earliest convenience.**

In the meantime, please do not hesitate to contact me if you have any questions or would like any additional information.

Thank you in advance for your consideration.

Yours sincerely,

[REDACTED]

From: [REDACTED]
Sent: 06 August 2020 17:19
To: [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu); [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)
Cc: [REDACTED] [@kreab.com](mailto:[REDACTED]@kreab.com)>; [REDACTED] [@kreab.com](mailto:[REDACTED]@kreab.com)>; [REDACTED] [kreab.com](mailto:[REDACTED]@kreab.com)>
Subject: ATCS - Meeting request to discuss PFHxA restriction proposal and CfE all PFAS

Dear [REDACTED], dear [REDACTED],

We hope this email finds you well.

We are contacting you on behalf of the **Alliance for Telomer Chemistry Stewardship**, an industry alliance of the largest producers of C6 fluorotelomer-based chemistry, representing AGC, Daikin, Dynax Corporation, and Johnson Controls. The purpose of this email is to request a meeting/call to discuss **the [proposal for a restriction of PFHxA, its salts and related substances](#) under the REACH Regulation, as submitted by Germany in December 2019.**

As you are most likely aware, ECHA recently launched its [consultation on the restriction proposal](#). ATCS has already submitted two responses to the consultation in May and July (see attached). We will prepare a third submission with a detailed list of additional derogation needs, which will be submitted before the **deadline for final contributions on 25th September**.

The ATCS does not believe that PFHxA meets the criteria for restriction under REACH. We are also concerned about the **insufficient analysis provided in the dossier with respect to derogation needs related to C6 fluorotelomer chemistry**. As you are most likely aware, C6 fluorotelomer chemistry plays a **key role in many strategic sectors in Europe**, particularly in providing the required levels of water- and oil-repellence, barrier properties and unmatched surface-active capabilities.

In addition to the restriction of PFHxA, we would be grateful for the opportunity to also discuss **the forthcoming Restriction on all PFAS**. The ATCS has participated in the [Call for Evidence](#) launched by Germany, The Netherlands, Denmark and Sweden, and supported by Norway (see also attached).

We would like to propose to hold the meeting from September onwards. If you agree, we will be happy to propose various dates/times.

So long as the COVID-19 situation persists, we propose to hold the meeting in a web-based format or as a conference call.

In the meantime, we remain at your disposal would you need additional information.

Thank you very much for your consideration.

Kind regards,

[REDACTED]