From: [redacted] on behalf of FINK-HOOIJER Florika (ENV)
Sent: mercredi 27 juillet 2022 16:42
To: [redacted] (ENV)
Subject: Thank you - follow up from discussion

From: FINK-HOOIJER Florika (ENV)
Sent: Wednesday, July 27, 2022 4:23 PM
To: [redacted]@mmm.com>
Cc: [redacted]@mmm.com>; [redacted]@mmm.com>; [redacted] (ENV) [redacted]@ec.europa.eu>; CHILD Patrick (ENV) <[redacted]@ec.europa.eu>; [redacted] (ENV) [redacted]@ec.europa.eu>; CIOBANU-DORDEA Aurel (ENV) <[redacted]@ec.europa.eu>
Subject: RE: Thank you - follow up from discussion

Dear Mr [redacted], dear [redacted]

It was a pleasure meeting you and your colleagues and I am appreciative for the informative exchange of views we had.

As explained, discussions are ongoing on the concept of essential use and on the next steps regarding the targeted revision of REACH. I took well note of the additional arguments provided in your mail, which I am sharing with my colleagues in charge of this specific file. I might have overlooked it but I did not saw the final version of the 3M presentation from our meeting you were referring to as an attachment to your mail. Your team may wish to resend it to all colleagues in copy. Thank you.

We shall stay in contact,
Best
Florika

Florika FINK-HOOIJER
Director General

European Commission
Directorate General for Environment

Avenue d'Auderghem 19, B-1000 Belgium
[redacted]

[redacted]@ec.europa.eu

From: [redacted]@mmm.com>
Sent: Wednesday, July 20, 2022 6:47 PM
To: FINK-HOOIJER Florika (ENV) [redacted]@ec.europa.eu>
Cc: [redacted]@mmm.com>; [redacted]@mmm.com>
Subject: Thank you - follow up from discussion

Dear Ms. Fink-Hooijer -

Thank you again for our discussion early July about the EU Green Deal, EU Industrial Policy and the need for specialty chemicals to achieve EU strategic objectives (green, digital, resilient / strategic autonomy). I would like to stress again 3M's support for a strong single market and the EU Green Deal objectives, including the zero-pollution ambition. Recalling our discussion on the need for companies to have certainty and balanced future legislation to plan investment, I would like to reiterate the following points:

- ***Regulating PFAS requires pragmatism ("smart grouping")***: The EC should not embark into banning all PFAS without a full understanding of its broad impact. There is a need for closing the data gap as to which PFAS poses an unacceptable risk to the environment or health, and for ensuring that the EU industry has the time to develop suitable alternatives. We would like to ask the EC to consider an alternative (grouping) approach for regulating PFAS. For example, a decision tree based on risk assessment, starting with the analysis of (eco)toxicological profile of relevant PFAS and their use, would be useful.
- ***Durable products will require persistent materials (contribution to circular economy)***: Many products need the functionality provided by individual PFAS to be durable and perform over time under demanding, sometimes extreme, conditions. Despite the negative perception currently assigned to the persistence of PFAS, it can be beneficial as it enables critical performance, durability and functionality of the application. Persistence can also support the circular economy's approach (performance = less materials needed, durability = less waste generated).

- ***Substitution will take time and will be challenging for some applications.*** Some applications (especially industrial ones) will have more difficulties with replacing PFAS than others without compromising on the safety and performance. Inertness and durability are key requirements for certain applications, and such functionality cannot be easily substituted with non-PFAS alternatives. In cases where durability is required, an alternative would very likely also be persistent.
- ***Health science on PFAS is not settled.*** While "legacy PFAS" like PFOA and PFOS can bioaccumulate in humans, it is key to recognize that these legacy PFAS-substances are no longer manufactured or used in Europe and their levels have been steadily dropping since the past 20 years. It is equally important to acknowledge that scientific evidence demonstrates no cause-and-effect relationship for any of the studied effects at levels people are exposed to. As a matter of fact, there is a large safety margin between the no-observed-adverse-effect level (NOAEL) assessed in laboratory animals and the measured levels in humans or nature.
- ***Need to distinguish between legacy PFAS and modern Fluoro-chemistries.*** While legacy PFAS such as PFOA and PFOS have been found to bioaccumulate in humans, this is not true for the shorter chain PFAS and other PFAS structures (e.g. fluoropolymers). Human biomonitoring results continue demonstrating this as well.
- ***PFAS emissions in the environment can be controlled and will be further limited.*** 3M committed to reduce PFAS discharges by more than 99% by 2024. In addition, we are working with downstream users and industry partners to control emissions throughout the life cycle of products (closed systems, recovery, recycling).

I look forward to continuing our discussion and thank you for any feedback. I attach for your information the final version of the 3M presentation from our meeting.

Sincerely,

[redacted]

3M Science. Applied to Life.™

[redacted] | [redacted], [redacted]

3M Research and Development
3M Center | Bldg 220-7W-02 | St. Paul, MN 55144-1000
Office: +1 [redacted]
Mobile: +1 [redacted]
[redacted]@3M.com