



September 25th, 2023

ECHA Committee
c/o European Chemicals Agency
P.O. Box 400
00121 Helsinki
Finland
restriction@echa.europa

Subject: 2023 ECHA Annex XV Restriction Report Proposal

These comments are submitted on behalf of Polaris Inc. and its subsidiaries (Polaris).

Introduction

Polaris designs, engineers, and manufactures all-terrain vehicles (“ATVs” or “quads”), recreational and utility side by side vehicles (“SbS”), in addition to other powersports vehicles. In the EU, these vehicles are regulated in a few categories as machinery, T-category, and L-category. With a portfolio of more than 30 brands, Polaris shares the ECHA’s goal of enabling consumers to use these vehicles safely.

Polaris is a member of the European Association of Motorcycle Manufacturers (ACEM), which represents the largest manufacturers of mopeds, motorcycles, tricycles and quadricycles with operations in Europe. These comments are intended to supplement comments previously submitted by ACEM.

Definition of Transport Vehicles

ANNEX XV Restriction Report, E.2.10, states that “The transportation sector covers all modes of transport, by road, rail, air and sea.” Polaris respectfully submits that the final report includes the term “off-road” to include non-road mobile machinery that operates off-road, such as all-terrain vehicles and side by side vehicles, in their definition of transportation sector.”

Conclusion

Polaris appreciates the opportunity to respond to the per- and polyfluoroalkyl substances (PFAS) ECHA public consultation to reduce the hazards associated with certain chemicals. If you have any questions or comments regarding any of the above, please contact me directly.

Best Regards,