

**From:** [REDACTED]  
**Sent:** 15 December 2020 09:43  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** Update on PFAS in firefighting foams Annex XV dossier preparation  
**Attachments:** Annex XV project planning.xlsx; Lengths of the transitional periods\_v2.docx

Dear [REDACTED] and [REDACTED]

I'd like to give you an update on the preparation of the Annex XV dossier for the PFAS in firefighting foams. I am responsible for this file in ECHA with the help of [REDACTED]. Ad hoc liaison with colleagues working or having worked on other PFAS-related matters will also take place, including [REDACTED] (universal PFAS restriction), [REDACTED] (PFHxA restriction). [REDACTED] being also co-Chair of SEAC it is possible that his role on this restriction proposal evolves in the future.

The basis for the Annex XV dossier will be the one prepared by Wood as part of the project we supervised together. We will complement this document with the hazard/"concern" part of PFAS and several other elements which are not present in Wood's report (e.g. impact on foam manufacturers, additional information on safe foam disposal, etc.). We will also have a close look at the comments received during the consultations/call for evidence on the PFHxA and universal PFAS restriction which provided useful additional information.

Regarding the PFHxA restriction there are some differences in the way the emissions and costs have been derived compared to Wood's report but we will investigate this further and see how we can best reflect the different approaches in the firefighting foam-specific Annex XV dossier and come up with a sensible range of figures. The approach in terms of transitional periods and derogation is also a bit different. Wood's study showed differences in terms of availability of suitable alternatives among sectors or types of applications and we would like to explore this approach further to possibly suggest sector/application-specific transitional periods.

We had the possibility this end of year to request additional consultancy work as part of our framework contract so we took this opportunity to request Ramboll to perform some tasks to complement our information basis. In the attached Excel sheet you can see a summary of the four small projects we are initiating (the procurement process is being finalised this week for the three latest projects).

In terms of lengths of transitional periods per sector/application type we came up with a possible breakdown as indicated in the attached Word file, based on availability of alternatives and possibilities for containment of fire waters. We would like Ramboll to calculate the PFAS emissions and transitional costs over time (and total) for three different transitional periods per foam sector of use/application type, for the two main restriction scenarios (Sc1: ban on placing on the market, continued use allowed; Sc 2: ban on the placing on the market and ban on use). The breakdown of sectors of applications proposed in the Word document is close but not identical to the initial sectoral breakdown proposed by Wood, so remains to be seen if Ramboll can deal with this difference easily.

The exact breakdown of sectors of use/application types and their definitions will have to be refined at a later stage but we thought that such an initial analysis could help in having a better idea of the impact of the lengths of the transitional periods.

We aim at having the kick-off call with Ramboll still this week. If you would like to share thoughts before this call, please let us know.

Best regards,

[REDACTED]

[REDACTED]

Scientific officer

Risk Management Unit II  
European Chemicals Agency  
PO Box 400 / Telakkakatu 6  
00121 HELSINKI, Finland

Tel: [REDACTED]

Mob: [REDACTED]  
[REDACTED]

<http://echa.europa.eu/>



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