

From: [REDACTED] (ENV)
Sent: 22 December 2022 16:23
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: 3M to Exit PFAS Manufacturing by the End of 2025

Dear Mr [REDACTED],

I am reaching out to you regarding the request below in case [REDACTED] would be interested in meeting with our Director for Circular Economy Mr Aurel Ciobanu-Dordea. You have indicated the week between January 30 and February 3, therefore I would like to already indicate that Mr Ciobanu-Dordea could be available on Thursday 2 February, either morning or afternoon, for an in-person meeting. Don't hesitate to let me know should [REDACTED] be interested and available, and we can proceed with the practicalities in January.

Thank you very much in advance.

Kind regards,

[REDACTED]

[REDACTED]



European Commission
Directorate-General for Environment
Directorate B – Circular Economy

[REDACTED]
B-1040 Brussels/Belgium

[REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)

Website: <http://ec.europa.eu/environment>

Follow us on:    

From: ENV DIRECTOR GENERAL <ENV-DIRECTOR-GENERAL@ec.europa.eu>

Sent: Thursday, December 22, 2022 12:48 PM

To: [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>

Cc: CIOBANU-DORDEA Aurel (ENV) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED]

[\[REDACTED\]@mmm.com](mailto:[REDACTED]@mmm.com)>; [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>; [REDACTED]

(ENV) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>

Subject: RE: 3M to Exit PFAS Manufacturing by the End of 2025

Dear Mr [REDACTED],

We are able to come back with an answer. Unfortunately, due to a very charged agenda and prior commitments for the mentioned dates for Ms Fink-Hooijer, we are unable to propose a slot, to our regret.

However, Director Aurel Ciobanu-Dordea is available to step-in and represent Ms Fink-Hooijer and DG ENV for this meeting.

If agreed, [REDACTED], will contact you directly and arrange the details.

We take this opportunity to thank you for the collaboration and send our best wishes for 2023.

Kind regards,

[REDACTED]

[REDACTED]



European Commission/Directorate-General for the Environment
Avenue d'Auderghem 19, B-1000, Bruxelles/Brussel

env-director-general@ec.europa.eu

Website: <http://ec.europa.eu/environment>

Disclaimer

This message represents solely the views of its author and cannot in any circumstances be regarded as the official position of the European Commission. It is intended solely for the person to whom it is addressed and may contain confidential information.

From: ENV DIRECTOR GENERAL <ENV-DIRECTOR-GENERAL@ec.europa.eu>

Sent: Wednesday, December 21, 2022 11:21 AM

To: [REDACTED] <[\[REDACTED\]@mmm.com](mailto:[REDACTED]@mmm.com)>

Cc: CIOBANU-DORDEA Aurel (ENV) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] <[\[REDACTED\]@mmm.com](mailto:[REDACTED]@mmm.com)>; [REDACTED] <[\[REDACTED\]@mmm.com](mailto:[REDACTED]@mmm.com)>; ENV DIRECTOR GENERAL <ENV-DIRECTOR-GENERAL@ec.europa.eu>

Subject: RE: 3M to Exit PFAS Manufacturing by the End of 2025

Dear [REDACTED],

On behalf of DG Fink-Hooijer, we hereby acknowledge receipt of your enquiry and we thank you for sharing the news related to 3M exiting PFAS manufacturing by 2025. We shared the information with relevant colleagues.

Related to the possible meeting we will come back to you with a reply as soon as possible.

Best regards,



European Commission/Directorate-General for the Environment
Avenue d'Auderghem 19, B-1000, Bruxelles/Brussel

env-director-general@ec.europa.eu

Website: <http://ec.europa.eu/environment>

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From: [REDACTED] <[\[REDACTED\]@mmm.com](mailto:[REDACTED]@mmm.com)>
Sent: Tuesday, December 20, 2022 4:59 PM
To: FINK-HOOIJER Florika (ENV) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Cc: CIOBANU-DORDEA Aurel (ENV) <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>;
ENV DIRECTOR GENERAL <ENV-DIRECTOR-GENERAL@ec.europa.eu>; [REDACTED]
<[\[REDACTED\]@mmm.com](mailto:[REDACTED]@mmm.com)>; [REDACTED] <[\[REDACTED\]@mmm.com](mailto:[REDACTED]@mmm.com)>
Subject: 3M to Exit PFAS Manufacturing by the End of 2025

Dear Florika,

I wanted to thank you again for the good working lunch at AECA end October – we appreciated your openness during the fruitful exchange of views.

I also wanted to inform you today re. a piece of news from 3M with the attached press release.

We would be pleased to further exchange with you on that matter.

FYI we will have again [REDACTED] coming to Europe during the week of January 30 until February 3.

This could be a good time to further exchange ideas and debrief you on this major 3M decision and the impact for the industry.

Meanwhile I wish you and your team the best for the holiday season.

I copy Aurel with whom we also had a fruitful exchange early October!

Best regards,



Hermeslaan 7 | 1831 Diegem (Brussels) Belgium

Office: [REDACTED] | Mobile: [REDACTED]
[REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com) | www.3M.com
Twitter: [REDACTED]
EU Transparency Register ID Number: 91425447458-88

From: [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>
Sent: Saturday, 22 October 2022 16:23
To: [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)
Cc: [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>; [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>; [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; CHILD Patrick [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; CIOBANU-DORDEA Aurel [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
<[REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Subject: FW: Meeting with 3M [REDACTED] (October 6): follow up documents & course of action

Dear Ms. Fink-Hooijer –
Earlier in October, I had the opportunity to follow up on our discussion and engage with Mr. Ciobanu-Dordea and [REDACTED]. I greatly valued the exchange and the insights and perspective of Mr. Ciobanu-Dordea and [REDACTED] have been very helpful as we continue to work in support of the EU Green Deal. I've attached the follow-up materials from that discussion for your reference. I'd be happy to follow-up and provide you or your team with further details on the proposals and continue the discussion.

Thank you for the open and ongoing engagement

Best regards –

[REDACTED]

3M Science.
Applied to Life.™

[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](mailto:[REDACTED]@3M.com)

From: [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>
Sent: Friday, October 21, 2022 3:37 AM

To: CIOBANU-DORDEA Aurel <[REDACTED]@ec.europa.eu>

Cc: [REDACTED]@ec.europa.eu;

[REDACTED]@ec.europa.eu>;

[REDACTED]@mmm.com>;

[REDACTED]@mmm.com>;

[REDACTED]@mmm.com>

Subject: Meeting with 3M [REDACTED] (October 6): follow up documents & course of action

Dear Aurel,

It was good meeting you and Peter on October 6. Thank you again for the open discussion about the EU Green Deal, CSS and the need for specialty materials to achieve EU strategic objectives (decarbonized, digital, resilient and autonomous Europe).

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:

- **Durable products will require persistent materials.** Many products need the functionality provided by persistent chemicals to be durable and perform over time under demanding, sometimes extreme conditions. Despite the negative perception currently assigned to the persistence of certain chemicals like PFAS, persistence can be beneficial as it enables critical performance, durability and functionality of the application. Persistence can also support the circular economy's approach as performance means less materials, and durability means less waste generated.
- **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, if at all possible. We would like to ask the EU regulator to consider an alternative to the 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.
- **Need to distinguish between legacy PFAS and modern fluoro-chemistries.** While legacy PFAS such as PFOA and PFOS have been found to bioaccumulate, this is not true for all PFAS, especially 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 from its manufacturing processes 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).

- **Health science on PFAS is not settled.** As mentioned, while “legacy PFAS” like PFOA and PFOS can bioaccumulate, it is key to recognize that these legacy PFAS-substances are no longer manufactured or used in Europe for more than 15 years and that 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 the environment.

Per your suggestion, I attach for your consideration 2 thought starters with a few ideas on how PFASs could be regulated differently re. alternative grouping & derogation process. We would be happy to follow-up with you and your team on a more detailed proposal based on the existing legal framework.

We look forward to continuing our discussion - please let us know when you would like to have another meeting, and thank you for any feedback. I also attach for your information the 3M presentation from our meeting.

Sincerely yours,

[Redacted]

3M

[Redacted]

Hermeslaan 7 | 1831 Diegem (Brussels) Belgium

Office: [Redacted] | Mobile: [Redacted]

[Redacted] [@mmm.com](mailto:[Redacted]@mmm.com) | www.3M.com

Twitter: @ [Redacted]

EU Transparency Register ID Number: 91425447458-88

From: CIOBANU-DORDEA Aurel [Redacted] [@ec.europa.eu](mailto:[Redacted]@ec.europa.eu)>

Sent: Wednesday, 28 September 2022 13:46

To: [Redacted] [@mmm.com](mailto:[Redacted]@mmm.com)>

Cc: [Redacted] [@mmm.com](mailto:[Redacted]@mmm.com)>; [Redacted] [@ec.europa.eu](mailto:[Redacted]@ec.europa.eu)>

Subject: [EXTERNAL] RE: Meeting with 3M [Redacted] : Thursday 6 or Friday 7 morning

Dear [Redacted],

Sorry for the delay in replying. Thursday 6 in the morning would be fine.
[redacted] in copy, will get in contact with you for the preparations.

Thanks and looking forward to the discussion,

Aurel

From: [redacted] <[\[redacted\]@mmm.com](mailto:[redacted]@mmm.com)>
Sent: Wednesday, September 28, 2022 12:14
To: CIOBANU-DORDEA Aurel (ENV) <[\[redacted\]@ec.europa.eu](mailto:[redacted]@ec.europa.eu)>
Cc: [redacted] <[\[redacted\]@mmm.com](mailto:[redacted]@mmm.com)>
Subject: RE: Meeting with 3M [redacted]: Thursday 6 or Friday 7 morning

Dear Mr. Ciobanu-Dordea / Dear Aurel,

I would like to follow-up on this email I sent to you early last week. We were wondering whether you would have any availability to meet with our [redacted] in town next week? Would perhaps Thursday morning (8:30-9:30) or Friday work for you? Please let me know what would be the timeslots free in your calendar.

We would like to talk about the strategic execution of the green deal: importance of specialty chemicals / materials for strategic value chains in Europe and innovation angle / search for alternatives. The objective of this meeting is to exchange with you re. strategy & policy coordination.

Thank you for your attention and apologies for short notice but I think can be a very valuable exchange.

Kind regards,

[redacted]

3M Science.
Applied to Life.™

[redacted]
[redacted]

Hermeslaan 7 | 1831 Diegem (Brussels) Belgium

Office: +32 [redacted] | Mobile: +32 [redacted]

[redacted] <[\[redacted\]@mmm.com](mailto:[redacted]@mmm.com)> | www.3M.com

From: [REDACTED]
Sent: Tuesday 20 September 2022 15:10
To: CIOBANU-DORDEA Aurel <[REDACTED]@ec.europa.eu>
Cc: [REDACTED]@mmm.com>
Subject: Meeting with 3M [REDACTED]: Monday 3 October afternoon, or Wed 5 afternoon or Thursday 6 or Friday 7 morning

Dear Mr. Ciobanu-Dordea / Dear Aurel,

It was very nice e-meeting you as a chair of AmCham EU Environment Committee early September – thank you again for your time and a very rich discussion.

I'm reaching out to you as [REDACTED] will be in Brussels the week of the 3-7 October. That week he will be following up meetings we had in March with EU Commissioners Breton & Sinkevicius where we discussed the need for specialty materials & chemicals for ensuring the development of strategic value chains in Europe, and achieving the Green Deal as well as Paris Agreement's goals. We have been then advised to continue discussions at DG level: we already started with Ms. Fink-Hooijer in July and John would appreciate to also meet and continue the discussion with you. As [REDACTED] he is looking at innovation and investment worldwide – we have 20,000 employees in Europe.

Thank you to let me know whether you would be available and what day/time.

Best regards, [REDACTED]

3M Science.
Applied to Life.™

[REDACTED]
Hermeslaan 7 | 1831 Diegem (Brussels) Belgium
Office: [REDACTED] | Mobile: +[REDACTED]
[REDACTED]@mmm.com | www.3M.com

From: [REDACTED]@mmm.com>
Sent: Thursday 28 July 2022 01:31
To: FINK-HOOIJER Florika [REDACTED]@ec.europa.eu>
Cc: [REDACTED]@mmm.com>; [REDACTED]@mmm.com>; [REDACTED]@ec.europa.eu>; CHILD Patrick [REDACTED]@ec.europa.eu>; [REDACTED]@ec.europa.eu>; CIOBANU-DORDEA [REDACTED]

Aurel [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>

Subject: RE: Thank you - follow up from discussion

Dear Florika –

Thank you for following up. I believe [REDACTED] has provided you with the materials. My apologies for not including it in my earlier note.

Please let me know if there is any comments or questions on the material. I'm happy to follow-up with you and your staff at your convenience

I look forward to continuing the discussion

Thanks

[REDACTED]

From: FINK-HOOIJER Florika [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>

Sent: Wednesday, July 27, 2022 9:23 AM

To: [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>

Cc: [REDACTED] [mmm.com](mailto:[REDACTED]@mmm.com)>;

[REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>;

[REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; CHILD Patrick [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>;

[REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; CIOBANU-DORDEA

Aurel [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>

Subject: [EXTERNAL] RE: Thank you - follow up from discussion

Dear Mr B [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](mailto:[REDACTED]@ec.europa.eu)

From: [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>
Sent: Wednesday, July 20, 2022 6:47 PM
To: FINK-HOOIJER Florika (ENV) [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Cc: [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com)>; [REDACTED]
[REDACTED] [@mmm.com](mailto:[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 Research and Development
3M Center | Bldg 220-7W-02 | St. Paul, MN 55144-1000
Office: +1 [REDACTED]
Mobile: +1 [REDACTED]
[REDACTED] [@3M.com](mailto:[REDACTED]@3M.com)