

To: [REDACTED]
Cc: [REDACTED] MONTANI Elena (ENV)
Subject: RE: PFAS - request for a meeting

Dear [REDACTED],

As already communicated to you in December, please be aware that we have provided your contact details to our contractor who is currently preparing a first workshop for stakeholders on the concept of essential uses planned to take place on 3 March 2022. This is an open and inclusive forum where all interested stakeholders can provide their input to this topic. As such and in this point in time, it is therefore preferred over bilateral meetings.

You may find more information about this workshop here:

[Stakeholder workshop on the concept of 'Essential uses' \(europa.eu\)](#)

Finally, as also indicated to you earlier, the initiative to prepare a restriction proposal for a group of PFAS substances is an initiative of a group of Member States, not of the European Commission. You are therefore advised to provide information about your specific uses of PFAS to those Member State authorities (for more details, please consult [Registry of restriction intentions until outcome - ECHA \(europa.eu\)](#)).

Yours sincerely,

[REDACTED]
European Commission
DG ENVIRONMENT
Unit B.2 Sustainable chemicals
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This e-mail contains the personal opinions of the author and does not necessarily reflect the official opinion of the Commission. L'opinion exprimée ici est un avis personnel qui ne reflète pas nécessairement le point de vue officiel de la Commission.

From: [REDACTED] [@animalhealtheurope.eu](mailto:[REDACTED]@animalhealtheurope.eu)
Sent: Friday, February 4, 2022 1:29 PM
To: MONTANI Elena (ENV) <Elena.MONTANI@ec.europa.eu>; [REDACTED]
Cc: [REDACTED] [@animalhealtheurope.eu](mailto:[REDACTED]@animalhealtheurope.eu); [REDACTED]
Subject: PFAS - request for a meeting

Dear Ms Montani and [REDACTED],

AnimalhealthEurope is the association representing manufacturers of animal medicines, vaccines and other animal health products in Europe. We are a Brussels-based not-for-profit body representing both corporate members and national animal

health associations in Europe. It represents both innovators and generics alike, as well as large, medium-sized and small companies. AnimalhealthEurope's membership covers 90% of the European market for animal health products.

As you may know, some veterinary medicinal products (VMPs), after having been approved by the EMA contain PFAS.

However, as a result of the REACH Regulation (Reg 1907/2006) various initiatives are already impacting VMPs either during their manufacture or in their composition, and are in direct conflict with the rules in Reg 2019/6 (Veterinary Medicinal Products Regulation) entry into force on 28 January 2022. For example the recently launched proposal for restriction of per- and polyfluoro alkyl substances (PFAS) which, given its broad definition of PFAS, threatens a ban on specific VMPs or renders their manufacture impossible as there are no alternatives. E.g. this could eliminate all inhalation anaesthetics currently used in both human and veterinary medicine, and it could cause significant treatment gaps in other areas with implications for animal health but also for public health as some of the conditions that are treated by these medicines (e.g. fleas and ticks, and the diseases they carry) can impact human health if the animals are left insufficiently treated, or even untreated.

As we are aware that you are responsible for this file in DG Envi for the human medicines, and as our issues are quite similar, we would very much value to discuss with you the particularity of our sector and products, exchange on what the definition of "essential use" could entail, be consulted by the consulting firm Wood you are working with and be informed/involved in relevant workshops on the topic.

I hope to have an opportunity to discuss these elements with you in February still.

Best regards,



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