



FPP4EU Collaboration Platform Meeting

Teams meeting – 21st June 2023

Cefic – product stewardship – contact:  [@cefic.be](mailto:cefic@cefic.be)

The European Chemical Industry Council, AISBL – Rue Belliard, 40 – 1040 Brussels – Belgium – Transparency Register n°64879142323-90



June 2023 SEAC plenary

- **CONTENT**

- Stakeholder comment

- Recommendations

- Conclusion



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Extract of some statements shared by stakeholders

- **Cefic**

- Two studies launched on economic impacts
- Existing of collaboration platform with industry impacted by the proposal
- Call on challenges for DU to participate and follow closely the process

- **Industry**

- Durability needed for the products
- Difference between PFAS chemicals and multiple applications
- Potential overlap with other legislations

- **NGO's**

- Urgent situation to act to avoid increase Env/HH impact but also to limit future costs for society
- Call of support to find alternatives



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Observations after first reading from rapporteurs – useful tips for industry

Clarification welcome to increase robustness of the assessment

Any relevant, useful and justified information from the public consultation to be used

- **Uses and additional applications**

- **Extrapolation based on 14 uses** - additional information and correlation between emissions and socio economic impact of the restriction
- **Sector/industry data** - provided in the consultation to be included in the assessment

- **Structured presentation of information to allow systematic approach and consistent assessment**

- **Status of alternative solutions** –Address all elements relevant for the recommended alternative – availability, technical and economic feasibility , risks of alternatives,etc.
- **Excell sheet or table (per sector/sub-use)** - with tonnages (manufactured-used-placed on the market), annual emissions (resulting from technical stock), socio economic aspects, substance ID, timing of derogations, 2nd hand articles, waste stage, etc.
- **Mapping (sub)-uses** – listed and additional applications



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Observations after first reading from rapporteurs - Clarification to support the assessment

Any relevant and justified information from the public consultation to be used

- **Qualitative information**
 - **Qualitative approach applied due to missing data** – any indication why quantitative approach is challenging.
 - **Additional quantitative information from industry to support the assessment** – data on economic, environmental, health impacts.
- **Derogations - based on availability of alternative solutions – clarification to allow systematic approach**
 - **Proposed derogations** –Pesticides, biocides, medicinal products - clarification – emission, amount of products covered => **Waste stage** information
 - **Transition period** – additional data to support the proposed timing – certification/approval processes.
 - **Enforcement** – clarify which uses fall under the proposed derogations
 - **Interactions** - between certain derogations - for polymeric PFAS - for the use of PFAS in production of polymeric PFAS and general ban on manufacture of PFAS.



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Observations after first reading from rapporteurs - Clarification to support the assessment

Any relevant and justified information from the public consultation to be used

- **Concentration limit**
 - Clarification on rationale and functioning of concentration limits
- **Transition period**
 - Clarification supporting the length of the transition period
- **Existing legislations**
 - Clarification on how substances are regulated - What is the level of protection (HH/Env) already in place. (PPP/BPR/medical products, and other derogations).



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- **CONCLUSION**

- Recommendations provide additional indications to industry
- What kind of data will help keeping consistency in the assessment approach

=> The clearer the comment provided in the consultation

=> The better the understanding by the committee's





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