



To:

5.1.2e - Netherlands

5.1.2e - Germany

5.1.2e - Sweden

5.1.2e - Denmark

5.1.2e - Norway

5.1.2e @rivm.nl

5.1.2e @baua.bund.de

5.1.2e @kemi.se

5.1.2e @mst.dk

5.1.2e @miljodir.no

Dear all,

Cefic and PlasticsEurope (Fluoropolymers Group) are closely following the policy developments on PFAS. We recognize the need for sufficient and reliable information for an effective and workable policy on PFAS substances. We welcome the opportunity to engage with the REACH authorities who have initiated an evidence gathering exercise prior to the submission of a registration of intention for a REACH restriction dossier, planned for the second half of 2021.

During the past few weeks member companies have been contacted by several consultancies requesting on your behalf, a variety of scientific and socio-economic data from industry stakeholders. However, the way in which the data collection is currently being handled poses practical challenges and risks to jeopardize the quality of submitted info.

The PFAS group of substances represents a very diverse group of substances with a broad range of physicochemical properties and a myriad of uses, emphasizing the need to involve the entire value chain which relies on the availability of PFAS for their applications.

We are committed to deliver the requested information working with our value chain, but we need to have the appropriate conditions to do this in a meaningful and effective way:

- **Overview.** We do not have an overview which questionnaires have been sent to whom, which makes it difficult to assess whether the appropriate companies or associations are involved, whether important ones are missing, which customers are aware, etc.
It would help us to have an overview of questionnaires and addressees.
- **Harmonisation and general purpose.** Questionnaires for different uses will have different questions, but as companies may receive multiple questionnaires, a certain streamlining of types of information would be helpful. In addition, a better understanding of how the requested information will be used in the context of the restrictions will help companies to provide appropriate information.
- **Realistic timelines:** Industry wants to provide meaningful and reliable data. Answering these detailed questionnaires on many different uses need a realistic timeframe to be able to reach out to our downstream users.
Timeframes may vary depending on specific situations, but this will need at least several months. We would therefore kindly request to extend deadlines for responding to the end of the first quarter 2021.
- **Confidentiality:** Some questions are asking for sensitive confidential business information, but it is unclear how confidentiality is guaranteed. This is a major concern and will hamper the collection of information if not thoroughly organised. Could you share details on how sensitive information will be protected and used to guarantee strict confidentiality?



We would highly appreciate if you would consider the above elements and adapt the procedures to enable a meaningful input to the data-collection exercise.

For further information, please feel free to contact [redacted] (contact details below) or [redacted] ([\[redacted\]@plasticseurope.org](mailto:[redacted]@plasticseurope.org) | [redacted])

Yours Sincerely,

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[redacted] REACH & Chemicals Policy
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