

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** RE: ECHA's restriction proposal on firefighting foams: suggestion for a discussion  
**Date:** 05 February 2021 17:34:32  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)

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Dear [REDACTED] and all,

Thank you very much for your quick response ! Indeed, we would be happy to have a discussion especially on if and how the large users of PFAS-based firefighting foams (for class B fires – flammable liquids) such as oil and petrochemical installations could be defined in a regulation using reference to the Seveso or IED Directives, how the classification and permit system works and if the granting of permits could possibly require a justification for continuing using PFAS-based foams in case a REACH restriction is put in place for this use.

I created the following [Doodle poll](#) to check availabilities. For the ones interested in joining, thank you for filling in by 9 February COB.

Best regards,

[REDACTED]

[REDACTED] [REDACTED]

Scientific officer  
Risk Management Unit II  
European Chemicals Agency  
PO Box 400 / Telakkakatu 6  
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**From:** [REDACTED] <[REDACTED]>  
**Sent:** 05 February 2021 13:28  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** [REDACTED] <[REDACTED]> [REDACTED]  
<[REDACTED]> [REDACTED] <[REDACTED]>  
**Subject:** RE: ECHA's restriction proposal on firefighting foams: suggestion for a discussion

Many thanks [REDACTED] for your quick reply.

[REDACTED] from ECHA will probably contact soon the colleagues you indicate. If a discussion is organised, I would be interested to join.

Kind regards

[REDACTED]

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**From:** [REDACTED] (ENV) <[REDACTED]>  
**Sent:** Friday, February 5, 2021 9:33 AM  
**To:** [REDACTED] (ENV) <[REDACTED]>  
**Cc:** [REDACTED] (ECHA) <[REDACTED]> [REDACTED] (ENV)  
<[REDACTED]> [REDACTED] (ENV)  
<[REDACTED]>  
**Subject:** RE: ECHA's restriction proposal on firefighting foams: suggestion for a discussion

Dear [REDACTED]

[REDACTED] is responsible for the Seveso Directive and is also knowledgeable regarding IED.

In terms of impacts of the decision, would this not also be other industrial plants not falling under Seveso and falling under IED?

I copy [REDACTED] and also our IED Team Leader [REDACTED]

Best regards,

[REDACTED]

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**From:** [REDACTED] (ENV) <[REDACTED]>  
**Sent:** Friday, February 5, 2021 9:19 AM  
**To:** [REDACTED] (ENV) <[REDACTED]>  
**Cc:** [REDACTED] (ECHA) <[REDACTED]>  
**Subject:** FW: ECHA's restriction proposal on firefighting foams: suggestion for a discussion

Dear [REDACTED]

ECHA is developing a restriction dossier on PFAS in fire-fighting foams. There will be longer transitional periods for large industrial installations with big atmospheric tanks. ECHA was wondering if we could refer to Seveso sites to identify such cases. Whom could ECHA contact in your Unit on the Seveso directive?

Kind regards

[REDACTED]

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** Tuesday, February 2, 2021 11:34 AM  
**To:** [REDACTED] (ENV) <[REDACTED]>  
**Cc:** [REDACTED] (ECHA) <[REDACTED]>  
**Subject:** FW: ECHA's restriction proposal on firefighting foams: suggestion for a discussion

Dear [REDACTED]

I suggested a short call with Eurofeu to invite them to provide clarification on the usage rate, the stocks and the 'definitions' of sectors/types of uses (see bottom email). Are you interested in joining this call? They propose the below timeslot. For us Friday works best all time.

Regarding the definition of sectors/types of uses I was thinking in making a distinction between the most problematic uses (large tanks, oil/petroleum and similar) from the other less problematic industrial uses (cfr. the first idea paper attached that I circulated earlier). Since it will be probably difficult to make a definitive list of the most problematic uses (industry always come with new example we haven't thought about) I was thinking in defining them as 'installations subject to the Seveso directive". However, I don't have much knowledge on the Seveso directive and it this idea makes sense. What do think? Are there any Commission colleagues I could consult on this?

Happy to get your views,

Best regards,

[REDACTED]

PS: I'm still awaiting feedback from US DoD on possible meeting times

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**From:** [REDACTED] <[REDACTED]>  
**Sent:** 02 February 2021 12:03  
**To:** [REDACTED] <[REDACTED]>  
**Cc:** Eurofeu <[REDACTED]>  
**Subject:** AW: ECHA's restriction proposal on firefighting foams: suggestion for a discussion

Dear [REDACTED]

just tried both of your lines to schedule a date.

However I could offer:

1. Thursday, February 4<sup>th</sup>, as of 13h (CEWT)
2. Friday, February 5<sup>th</sup>, from 9:00h until 15:00h (CEWT)
3. Wednesday, February 10<sup>th</sup>, from 9:00h until 13:00h (CEWT)

Hope this helps

Best

[REDACTED]

Mit besten Empfehlungen | Best regards | Meilleures  
Salutations | Saludos Cordiales | Cordiali Saluti

[REDACTED] [REDACTED] [REDACTED]

Produktmanagement



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Komplementärin: Sthamer Verwaltungsgesellschaft mbH, Sitz und Amtsgericht Hamburg  
HRB 69047

Geschäftsführer: Frithjof Sthamer, Lorenz Grabow  
USt.IDNr.: DE 118872866

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**Von:** [REDACTED]  
**Gesendet:** Dienstag, 2. Februar 2021 10:32  
**An:** [REDACTED] <[REDACTED]>  
**Betreff:** AW: ECHA's restriction proposal on firefighting foams: suggestion for a discussion

Dear [REDACTED]  
please accept my apologies for not having replied any sooner. Not sure what happened but yes we are interested to have a phone call. EUROFEU is committed to supporting and help improving new legislation making a transition seamless. So if we can assist with further and more detailed information we are happy to do so. Do you have a special date in mind for the call?

Mit besten Empfehlungen | Best regards | Meilleures  
Salutations | Saludos Cordiales | Cordiali Saluti

■■■■■  
Produktmanagement



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**From:** ■■■■■ <■■■■■>  
**Sent:** 26 January 2021 17:12  
**To:** ■■■■■  
**Cc:** ■■■■■ <■■■■■>  
**Subject:** ECHA's restriction proposal on firefighting foams: suggestion for a discussion

Dear ■■■ or ■■■■

As you are certainly aware of, the European Commission has requested the European Chemicals Agency (ECHA) to develop a restriction proposal for per- and polyfluoroalkyl substances (PFAS) in fire-fighting foams. The expected date of submission of this restriction proposal by ECHA for opinion-making is 01/10/2021.

In preparation to this restriction proposal the European Commission and ECHA contracted consultants in 2019 to conduct a study on the use of PFAS and alternatives in firefighting foams, study to which Eurofeu contributed and for which we thank you. The report of this [study](#) was published in summer 2020 and will be the basis for drafting ECHA's restriction proposal.

In parallel, other, separate regulatory initiatives on PFAS which might have an impact on firefighting foams have been initiated, such as the restriction proposal on PFHxA to which Eurofeu provided comments.

In the context of ECHA's restriction proposal we would like to gain additional insight and clarifications on certain issues such as:

- the foam usage rate (annual use rate compared to annual sales or compared to total stock)
- total amount of foam stock in the EU
- definition of sectors of use and types of application (e.g. marine sector, oil/gas/chemical sector, testing)

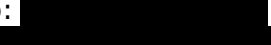
We suggest a call for us to explain in more details the information we are looking for and discuss the possibilities for Eurofeu to submit the relevant information.

Please note, as mentioned in the attached letter, that the information submitted will only be taken into account in the context of the restriction proposal prepared by ECHA on PFAS in firefighting foams, and not for the other regulatory processes possibly impacting firefighting foams which have their specific external input submission windows.

If you are interested in such a call, thank you for suggesting 2-3 timeslots in the coming weeks.

Thank you for your collaboration,

Best regards,

  
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