

From: [REDACTED]
To: [REDACTED]
Cc: [ECHA Restriction PFAS in firefighting foams](#)
Subject: RE: RAC restrictions in year 2021 : PFAS
Date: 14 July 2022 10:41:00
Attachments: [image003.png](#)
[image004.png](#)
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[image010.png](#)
[image011.png](#)
[image012.png](#)
[image013.png](#)

Dear [REDACTED]

Apologies for the long delay in replying to you. I just found your email.

In response to your questions.

1. Harmonised classification for the PFAS class is not part of the proposed restriction.
2. The restriction option described as an export ban would strictly be a ban on the formulation of foams containing PFAS ingredients. This would be because of the releases associated with the formulation step. A ban on formulation would automatically result in a ban on export. The wording was used to ensure that stakeholders understood the implications of this restriction option. The wording used in the Background Document (the version of the proposal that RAC and SEAC ultimately make their opinions on) has been revised to remove the term export from the draft Annex XVII text based on feedback from some stakeholders that this is misleading and outside of the scope of REACH.
3. The proposed restriction on firefighting foams contains sector-specific transitional periods, which can be understood to be derogations. The phrase 'no derogations' on corresponds to at the end of the transitional periods. The proposed restriction ensures the phase-out of PFASs in firefighting foams. The approach to derogations in the universal PFAS restriction is the responsibility of the 5 Member States preparing the proposal.
4. The decision to delay the submission of the universal PFAS proposal until January 2023 was taken to ensure that the quality of the proposal was sufficient. They have very large volume of information to process.

Any further questions I would be pleased to answer and hopefully more quickly than these.

Yours,

[REDACTED]

[REDACTED]
Senior Scientific Officer / Restriction Process Coordinator
Risk Management I / D3
European Chemicals Agency
P.O. Box 400, FI-00121 Helsinki, Finland

[REDACTED]
<http://echa.europa.eu/>



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From: [REDACTED]
Sent: 17 March 2022 22:17
To: [REDACTED]
Subject: RE: RAC restrictions in year 2021 : PFAS

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Good evening [REDACTED]

Unfortunately, I missed your presentation (as attached) last Monday March 14th scheduled for 17.30 – as given much earlier (I should have indicated RAC secretariat that I had particular interest in this subject so that I would have received warning the programme was advanced).

Nevertheless very interesting ppt and please allow to ask me some questions for clarification :

- Slide 12 : Harmonized Hazard Classes could be applicable for PFOS ..., does this mean also for PFAS in FFF but also for the universal PFAS?
- Slide 19 : RO3 seem to be the preferred restriction approach, incl. export ban = this is the first time we see export ban in a restriction, is this correct understanding?
- In addition it is written "No derogations", would this also be applicable for the universal PFAS restriction? And what about essential uses like in pharmaceutical products and PPPs, very much vertically regulated whereby stringent risk assessment are applied?

In addition, I am wondering why the U-PFAS restrictions proposal initially foreseen Mid 2022; is now delayed till Jan. 2023 : any particular reason ?

Your feedback on the above points would be very much appreciated.

Best regards,

[REDACTED]
Advisor - REACH, CLP, PIC & POP

[REDACTED]



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From: [REDACTED]

Sent: 07 June 2021 16:00

To: [REDACTED]
[REDACTED]

Cc: [REDACTED]

Subject: RE: RAC restrictions in year 2021 : PFAS

Dear [REDACTED]

Could I suggest that, if you have not already done so, you subscribe to ECHA's 'weekly' news bulletin. All PFAS-relevant announcements about risk management, including any entry to the ROI, will be made via this platform. I'm sure that you'll appreciate that we cannot undertake to keep you informed personally about developments.

<https://www.echa.europa.eu/news>

In terms of timing, I've not heard anything to suggest that the five countries planning has been changed.

Yours,

[REDACTED]

[REDACTED]

Senior Scientific Officer / Restriction Process Coordinator
Risk Management I / D3
European Chemicals Agency
P.O. Box 400, FI-00121 Helsinki, Finland

[REDACTED]

[REDACTED]

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From: [REDACTED]
Sent: 07 June 2021 16:40
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: RAC restrictions in year 2021 : PFAS

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Good afternoon [REDACTED]

Many thanks for your feedback and would very much appreciate if you can keep me in the loop of communication on PFAS topic and the intended broad restriction as Regular Stakeholder in RAC and SEAC.

In this respect, it was foreseen Entry in RoI towards end 1st Half 2021 and can you please inform me if this is likely going to be delayed?

Thanks for your further feedback.

Best regards,

[REDACTED]
Advisor - REACH, CLP, PIC & POP



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From: [REDACTED]

Sent: 07 June 2021 15:06

To: [REDACTED]

[REDACTED]

Cc: [REDACTED]

Subject: RE: RAC restrictions in year 2021 : PFAS

Dear [REDACTED]

The five countries working on the broad restriction of PFAS hosted a webinar in the autumn of 2020 to update stakeholders on the likely scope and timing. This is available on the ECHA website here:

<https://www.echa.europa.eu/-/restriction-of-per-and-polyfluoroalkyl-substances-pfas-under-reach>

There is also an accompanying Q&A document – on the same page.

[REDACTED] is right that we have not yet received the notification to the ROI (registry of intentions).

[REDACTED]

[REDACTED]

Senior Scientific Officer / Restriction Process Coordinator

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author as soon as possible and delete the message.

From: [REDACTED]

Sent: 04 June 2021 11:26

To: [REDACTED]

Cc: [REDACTED]
[REDACTED]

Subject: RAC restrictions in year 2021 : PFAS

Dear [REDACTED]

Thank you for your question on the upcoming restriction proposals.

The below slide refers to the current entry in the Registry of restriction Intentions (RoI) which aims at restricting the use of per- and polyfluoroalkyl substances (PFAS) in fire-fighting foams (planned to be submitted in October 2021 by ECHA). More details of the scope of the restriction proposal can be found at <https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e1856e8ce6>

The broader PFAS restriction is yet to be included in the RoI, [REDACTED] might have more information on the scope and the expected timelines.

On behalf of RAC Secretariat

Kind regards,
[REDACTED]

From: [REDACTED]

Sent: 04 June 2021 10:20

To: [REDACTED]

Cc: [REDACTED]
[REDACTED]

Subject: RE: RAC restrictions in year 2021 : PFAS

Hi [REDACTED]

Glad to see that someone actually reads the workplan ☺.

As I understand it, the PFAS restriction proposal will be much broader than fire-fighting foams.

I'm sure [REDACTED] can provide general information on the nature of this proposed restriction in as far as we know it. I put [REDACTED] our Restrictions coordinator in copy, should you want more detail on how such restrictions work in practice.

With best regards,
[REDACTED]

From: [REDACTED]

Sent: 04 June 2021 09:15

To: [REDACTED]

Cc: [REDACTED]

Subject: RAC restrictions in year 2021 : PFAS

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Good morning [REDACTED]

From the work programme new restrictions proposals 2021 (see hereunder), I have noticed that submission of PFAS restriction is foreseen Oct. 2021.

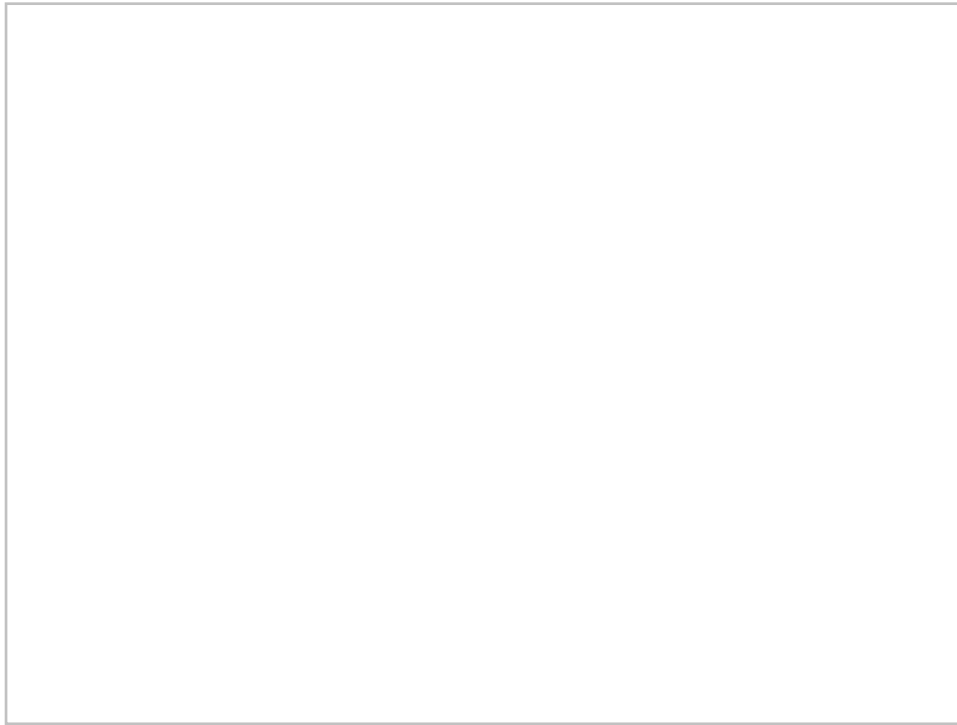
Can you / ECHA please clarify the definition and scope of this PFAS restriction? Is it related to PFAS used in firefighting foams?

The reason of my request is that we understand that 5 MS's (DK, SE, NL, DE and NO) are preparing a new proposal for a broad restriction of PFAS with intended proposal submission summer 2021.

Also any information or clarification of the definition and scope of such new PFAS restriction as under preparation by the 5 MS's would be appreciated.

Many thanks in advance for your feedback.

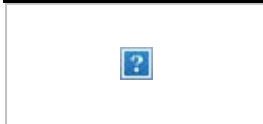
Best regards;



[Redacted]

Advisor - REACH, CLP, PIC & POP

[Redacted]



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