

To: 5.1.2e [5.1.2e @miljodir.no]; 5.1.2e [5.1.2e @baua.bund.de]; 5.1.2e [5.1.2e @kemi.se]; 5.1.2e [5.1.2e @mst.dk]
Cc: restrictiePFAS [5.1.2i @rivm.nl]
From: 5.1.2e
Sent: Tue 9/28/2021 9:02:05 AM
Subject: RE: PFAS REACH proposed restriction - Fluoropolymers Product Group RMOA study
Received: Tue 9/28/2021 9:02:06 AM

Dear 5.1.2e

We also received the document. Very interesting! Also in relation to our Friday discussions.

5.1.2e

From: 5.1.2e <5.1.2e @miljodir.no>

Sent: dinsdag 28 september 2021 10:26

To: 5.1.2e <5.1.2e @rivm.nl>; 5.1.2e <5.1.2e @baua.bund.de>; 5.1.2e <5.1.2e @kemi.se>; 5.1.2e <5.1.2e @mst.dk>

Cc: restrictiePFAS <5.1.2i @rivm.nl>

Subject: VS: PFAS REACH proposed restriction - Fluoropolymers Product Group RMOA study

Dear all,
 We just received the below email from the plastics industry. They have commissioned a consultant to develop a RMOA for fluoropolymers. See below for the main conclusions.

Best regards,

5.1.2e

Fra: 5.1.2e <5.1.2e @plasticseurope.org>

Sendt: tirsdag 28. september 2021 09:08

Til: 5.1.2e <5.1.2e @miljodir.no>

Emne: PFAS REACH proposed restriction - Fluoropolymers Product Group RMOA study

Dear 5.1.2e,

The Fluoropolymers Product Group (FPG) has commissioned the consulting firm ChemService to perform an independent Regulatory Management Option Analysis (RMOA) for Fluoropolymers. You can find the full study attached. Chemservice's RMOA has concluded that the best regulatory option to deal with concerns about fluoropolymers (FPs) will not be a full restriction but a combination of the following measures:

- A derogation of FPs and relevant monomers from the PFAS REACH restriction, supplemented by a Voluntary Industry Initiative which guarantees that industry will address the situations of concern related to manufacture and use of FPs
- an update of existing EU regulations on waste that would impact the end-of-life treatment of FP products, ensuring adequate technical controls are put in place to minimize to the furthest possible extent any risk derived from the disposal of FP products and from articles containing FPs

The study has also confirmed that there are no alternatives that can replace the high performance provided by fluoropolymers in "virtually every critical application in which they are used".

I will be pleased to have a meeting with you to answer to any questions you might have about this report and present our next publication on the phase use of our products.

Do not hesitate to contact me.

Kind regards,

5.1.2e

PlasticsEurope

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*Acting through Oaks & Reeds

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