

To: 5.1.2e@acumenpa.com' [5.1.2e@acumenpa.com]
 From: restrictiePFAS
 Sent: Sun 4/21/2024 11:38:25 PM
 Subject: RE: Announcement of revision of PFAS dossier
 Received: Sun 4/21/2024 11:38:25 PM

Dear 5.1.2e

I heard you've had a short call with 5.1.2e on this. I assume that helped in getting clarifications and answers to most of your questions and concerns.

If not, let me know.

Best regards,

5.1.2e

From: 5.1.2e <5.1.2e@acumenpa.com>
 Sent: vrijdag 19 april 2024 10:31
 To: restrictiePFAS <5.1.2i@rivm.nl>; 5.1.2e@BAUA.BUND.DE
 Subject: RE: Announcement of revision of PFAS dossier

Good morning 5.1.2e

Thank you for the swift response. It is much appreciated.

However, in order for me to be able to clearly report to my clients, I just have a clarification question. And apologies in advance but this is **really important**.

Question: can you be clear what your 'background document' is?

We know a 'background document' is part of the ECHA process, but these are only published (for public viewing) at the end of the ECHA process. However, the BAUA announcement clearly states the 5CA '**process will result in updates to the initially submitted proposal**'. In our understanding this refers to the **Annex XV report**. If the public is not going to be able to see your background document now, why would you announce this?

Unfortunately, and in my personal view, this does not bring clarity to a very complex and difficult situation for all. Stakeholders only see a very long drawn out opinion-building process and would like to better understand what is going on.

The '**report**' you refer to from ECHA 13 March announcement further confuses (Annex XV **report**? and not a **background document**?).

Apologies, but a lot of stakeholders rely on information from me. I need to understand what is going on. And I do very much appreciate your feedback.

Thanks,

5.1.2e

From: restrictiePFAS <5.1.2i@rivm.nl>
 Sent: Friday, 19 April 2024 01:43
 To: 5.1.2e; 5.1.2e@baua.bund.de'; restrictiePFAS
 Subject: RE: Announcement of revision of PFAS dossier

EXTERNAL

Hi 5.1.2e,

Thanks for your message. Since ECHA is the one that communicates about timelines, and since the finished SEAC and RAC opinion are the ultimate products of the opinion-making process, we cannot say when we will deliver our last update of the background document. And since the opinions are the ultimate products of this process, it is not very relevant when exactly the Dossier Submitters provide ECHA with the last part of the updated background document.

Having said that, the communication by ECHA from March 13 ([All news - ECHA \(europa.eu\)](#)) could give you some guidance on our work processes. Especially this phrase is important: "*This updated report will be assessed by the committees and will serve as the foundation for their opinions.*"

So, what we can say, is that we provide updates of the background document in batches to ECHA, as well, and that RAC and SEAC form their opinion based on our updated BDs and on the information provided by stakeholders during the consultation.

Hopefully this gives you at least some guidance. For further information, we will have to refer you to ECHA.

Best regards,

5.1.2e

From: 5.1.2e <5.1.2e@acumenpa.com>
 Sent: donderdag 18 april 2024 15:09

To: 5.1.2e @baua.bund.de; restrictiePFAS <5.1.2i @rivm.nl>

Subject: Announcement of revision of PFAS dossier

Dear BAuA, Dear RIVM colleagues,

Based on the [announcement](#) on the BAuA website (15 April), I wanted to ask if you had a timeframe for transmission of the revised PFAS dossier to ECHA?

Even a broad estimate would be welcome to know (e.g. before or after summer)!

Thank you in advance.

Kind regards,

5.1.2e

M: 5.1.2e

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