

[REDACTED]

From: [REDACTED]
Sent: 03 December 2021 17:31
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: FFF: RMOs and TPs

Dear [REDACTED]

As discussed, here is a table of the different restriction options that we have been assessing in the fire-fighting foams restriction with details of the transitional periods. Looking forward to discussing further with you on Wednesday next week. Please could you treat this as confidential for the time.

In addition, here is the link to the presentation that I gave on the proposal at ECHA's recent stakeholder day.

<https://www.youtube.com/watch?v=BYrC4H2ODzI>

Yours,

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From: [REDACTED] <[REDACTED]>
Sent: 03 December 2021 17:08
To: [REDACTED] <[REDACTED]>
Subject: FFF: RMOs and TPs

Hi [REDACTED]

As discussed:

RMO#	RMO description
1	Restriction on the placing on the market but use continued to be allowed until expiry date of the stocks
2	Restriction on the placing on the market and use after use/sector-specific transitional periods
3	Restriction on the export, placing on the market and use after use/sector-specific transitional periods

4	Restriction on the placing on the market and use after use/sector-specific transitional periods, with a derogation mechanism via a permit system to which only Seveso establishments and defence sites would be eligible
5	Restriction on the placing on the market and use for all uses after sector or use-specific transitional periods, unless adequate risk management measures are in place to minimise the emissions to the environment

All the risk management options above include transitional periods adapted to the different sectors of use or type of use, supplemented with the requirement to implement risk management measures minimising the emissions of PFAS in the environment.

The preferred RMO is RMO3 (i.e. ban on manufacture, export and use) with the following transitional periods:

- Training and testing: 18 months
- Municipal fire services: 18 months
- Civil ships: 3 years
- Seveso establishments: 10 years
- All other uses (e.g. civil aviation, defence, fire extinguishers, etc.): 5 years

In addition, from 6 months after entry into force: **additional RMMs**, including the mandatory collection of PFAS waste (firewater runoff, contaminated equipment cleaning water, expired foam concentrates, etc.) to the extent technically and economically feasible and disposal in hazardous waste incinerators, cement kilns or disposed of using [other treatment techniques reducing the concentration of PFAS close to zero].

PFAS concentration threshold: 1000ppb (1mg/L).

Best regards,

