

From: [REDACTED]@mmm.com>
Sent: vendredi 25 septembre 2020 14:02
To: SADAUSKAS Kestutis (ENV)
Cc: [REDACTED]
Subject: DG ENV & 3M cooperation - EMAS certification update
Attachments: 3M Considerations in view of future EU Chemical Strategy and PFAS Action Plan - 15 July 2020.docx

Dear Kestutis,
Hope you & family – and team - are well.

I just wanted to follow up on the EMAS certification for 3M's 2 sites producing PFAS chemicals in Europe (out of our 44 manufacturing sites in EMEA).

As mentioned to you we already have this certification for our site in Gendorf (Bavaria, Germany) and I can now confirm you that the process for having the EMAS certification for our other site next to Antwerp is now started and should be completed by end 2020.

3M is indeed very committed to responsible manufacturing. In this respect, we would be pleased to invite you and your team to come next to Antwerp in 2021 as we also are working on a large investment on this manufacturing site.

Meanwhile it would be great continuing our discussion, for example in November when the Chemical Strategy for Sustainability has been published? Please let me know your views & availability.

Finally, FYI, earlier this week at this year's historic 75th session of the UN General Assembly, 3M partnered with the United Nations Global Compact (+ Accenture & SAP) in launching the SDG Ambition program to support businesses in accelerating action to achieve the SDGs. The objective is to offer support on measuring and managing sustainability performance through business technology systems and enterprise software solutions. The [press release](#) is on UNGC website.

Thank you & best regards, [REDACTED]

From: [REDACTED]
Sent: Thursday 16 July 2020 21:37
To: [REDACTED]@ec.europa.eu
Cc: [REDACTED]

Subject: DG ENV & 3M cooperation - follow up

Dear Mr. Sadauskas / dear Kestutis,

I wanted to thank you again for our call last Thursday with Daniel Calleja Crespo (whom I copy and thank again for his time), and follow up on some points raised during our discussion.

I appreciated your comments on seeing 3M not only as an innovative company, but also as a responsible manufacturer. We are committed to serve society - customers and communities where we operate in the best way possible, and I will follow up with my colleagues internally on your suggestion of getting the 3M Zwijndrecht plant in Belgium registered to EMAS.

We also took note of the political pressure you are facing on the existing chemicals policy in Europe, and in particular on REACH and persistent substances. I would like to share with you (attached) some key considerations which we would like to bring to the discussion. We are planning to elaborate further on some of them, especially on the grouping approach and the essential use concept. In this respect, we would be pleased to continue our cooperation and have another exchange of views with you and your team after the summer break. I would also appreciate if I could take on your agreement for setting up a call with Bjorn Hansen at ECHA.

Lastly, I would like to stress again how important these chemicals are for society and modern life as we know it. We can see it every day as we develop technology solutions for consumers, governments and the industry in the healthcare, security, transportation or energy sectors. We cannot achieve a Digital and Green Europe without the use of some of those chemicals. As we are all preparing for an economically & socially difficult H2 2020 (and coming years), we will be looking for a pragmatic and balanced approach from the European Commission.

I wish you a nice and relaxing holiday season, and looking forward to meet again after the summer break.

Best regards, [REDACTED]



[REDACTED], Government Affairs & Sustainability, Europe & MEA

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EU Transparency Register ID Number: 91425447458-88

From: [REDACTED]

Sent: Wednesday 22 April 2020 18:00

To: [REDACTED] @ec.europa.eu; [REDACTED]
[REDACTED]
[REDACTED]

Subject: DG ENV & 3M meeting with Dr. Sue Chang, 3M global lead toxicologist - follow up

Dear Mr. Sadauskas, [REDACTED] & [REDACTED]

I hope you are well – as well as your families. With some delays, I wanted to thank you again for our meeting in February and follow up on some of your questions.

Since we met, and more precisely since early March until now, 3M has been extensively & directly engaged in fighting the covid-19 crisis as we produce the necessary personal protective equipment (PPE) and medical devices. FYI we have worked closely with DG GROW, SANTE and TRADE on the regulatory framework and been awarded the joint procurement agreement of DG Santé for masks (FFP2 that are critical for healthcare workers) for 13 Member States – currently under delivery.

Hence my apologies for my delayed answer following our meeting in February on fluoropolymers and fluorochemicals with [REDACTED] one of our global lead toxicologists. Please find below our answers to your questions:

1. Remediation plans on our PFAS related manufacturing sites in Europe

- 3M is a worldwide leader in the production of fluoropolymers and fluorochemicals with production sites in Germany and Belgium. These specialty chemicals play a key role in many high demanding applications and future technologies.
- In May 2000, 3M announced the voluntarily phase-out of PFOS and PFOA. In 2002, 3M eliminated the use of PFOS and completed the PFOA phase-out in 2008. This happened years before other fluoropolymer producers worldwide halted the use of PFOS and PFOA and long before regulatory provisions were put in place.
- 3M has been active in **Belgium** since 1963, including through the operation of its site in Zwijndrecht, one of 3M's main research, development and production sites for fluorochemical specialty chemicals. 3M employs more than 500 people in Belgium.
- In **Germany**, Dyneon GmbH, a fully owned subsidiary of 3M, has been active in Gendorf since 1996. This company is one of the leading global corporations in the fluoropolymer industry. Dyneon operates research, development, and production facilities for fluoropolymers and fluorinated monomers. With around 600 employees, Dyneon is an important employer in Bavaria.

Remediation activities undertaken by 3M in Zwijndrecht (Belgium)

- In 1997, a thermal oxidizer was installed to reduce emissions to air. In 2000, carbon filtration technology was added to the water treatment system to further reduce emissions. Both technologies have since been applied to many more process and production steps, resulting in significant overall emissions reduction.
- The production of PFOS in Zwijndrecht was stopped in 2002.
- 3M conducted soil and groundwater investigations at its Zwijndrecht site and submitted a Remedial Action Plan (RAP) for soil and groundwater impacts, which was approved by the Flemish Soil Agency (OVAM) in 2009. 3M reports its progress on the remedial actions to OVAM on a yearly basis.
- To follow-up on its RAP, 3M installed a pump and treatment system to remove Fluorochemicals and actively monitors the quality of water in its pumping wells and groundwater on and close to its site. Collected data show a stable/ decreasing trend in Fluorochemical concentrations on these locations. This suggests that the pump and treatment system is effective in reducing the concentrations of Fluorochemicals in groundwater.

Remediation activities undertaken by 3M Dyneon in Gendorf (Germany)

- PFOA has been used in Gendorf since 1968. Around 70% of today's PFOA concentration in the district was already there when Dyneon became active at the location in 1996.
- Dyneon has invested in modern retention and recycling technologies in a largely closed-circuit production process in Gendorf since 2000. Since then, residual emulsifier emissions have been further reduced steadily to a total capture rate >98%.
- In 2008, Dyneon was the first Fluoropolymer manufacturer worldwide to eliminate the use of PFOA.
- Today, further research is being conducted to achieve zero liquid discharge by complete closure of the water loop. Initial test plants are expected to be installed by mid-2020.
- Dyneon is the first company that has managed to develop a recycling process for single origin fluoroplastics. Production waste, that had to be disposed of or burned, can now be reintroduced into the loop. With this technology, large amounts of the natural raw material fluorite can be saved and emissions, like CO₂, can be reduced significantly.
- From 2010 through 2018, Dyneon conducted a detailed soil investigation to assess the presence of PFOA around its manufacturing location at Gendorf. Dyneon also conducted this investigation on behalf of companies that have, historically, also emitted PFOA in the region before Dyneon started its operations there in 1996.
- Currently, Dyneon, along with its industrial partners, is investing in activated carbon filter systems.

2. "Is 3M registered to EMAS?"

- The 3M Zwijndrecht plant does not have an EMAS registration, however it does have both ISO 14001 and 50001 certifications (as well as 9001 certification).

- Dyneon-Gendorf participates in the EMAS registration of the Chemical Park Gendorf, while also being ISO 14001 certified. An overview of all certificates can be found here: https://www.3mdeutschland.de/3M/de_DE/unternehmensinformationen/

3. **Information on PFBS**

- 3M commented extensively on PFBS during the Annex XV public consultation in October 2019 – please find our document attached. As a side remark, none of the argumentation provided by 3M has been taken into consideration by ECHA or the EU member states reviewing the PFBS dossier.

I hope this content will be useful for your team. As agreed in February, we would appreciate to continuing these discussions especially with the perspective of the Green Deal implementation and chemical strategy for sustainability. At 3M we indeed recognize the broader concerns linked to PFAS and we support EU-wide science-based regulation, coordinated research, and sharing best practices on detection, measurement, and remediation. We are committed to working with stakeholders, including the European Commission, to develop a comprehensive PFAS strategy, guided by the principles of sound science, responsibility, and transparency.

Thank you for your cooperation & we wish you a happy Earth Day!

Best regards,

3M

[REDACTED], Government Affairs, Europe & MEA

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