



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP
AND SMES
Ecosystems I: Chemicals, Food, Retail

DIRECTORATE-GENERAL FOR ENVIRONMENT
Circular Economy

The Directors

Brussels
GROW.F.1 [REDACTED]
grow.f.1(2023) 12731099



RECHARGE
[REDACTED] [@rechargebatteries.org](mailto:[REDACTED]@rechargebatteries.org)

Subject: Request to exclude batteries from the PFAS restriction proposal scope

Dear [REDACTED],

Thank you for your email of 9 November 2023 to Commissioner Sinkevičius in which you inform the Commission on the impact of the PFAS restriction proposal on your industry and on the society. In your email you also request the Commission to exclude batteries from the PFAS restriction proposal. The Commissioner asked us to reply on his behalf.

We took note of your position on the restriction dossier as submitted by Germany, the Netherlands, Denmark, Sweden and Norway. As you are aware, the European Chemicals Agency (ECHA) is assessing a possible restriction of use PFAS. A stakeholders' consultation on the restriction dossier recently ended.

Pollution from PFAS (per- and polyfluoroalkyl substances) is a serious human health and environmental concern, considering the large number of cases of soil and water contamination across Europe - including drinking water. At the same time, PFAS are needed in critical applications, for example in the digital and energy sectors (e.g. semiconductors, electrolyzers, batteries etc). For some of these applications, there are currently no suitable alternatives available on the market. Under the current REACH Regulation, derogations from restrictions can be granted based on the assessment of risk, availability of alternatives and socio-economic impacts. Therefore, the Commission envisages derogations for critical uses where no alternatives are currently available, while considering the need to minimise emissions of PFAS for the derogated uses in their entire life cycle.

We are sure we will keep in touch during general events organized in relation to PFAS, like we did during the Fipra roundtable on circularity and green transition (8 November) and the FPP4EU collaboration platform (11 December).

Our services remain at your disposal in case you wish to receive additional clarifications or information.

Yours sincerely,

(e-sign)
Kristin Schreiber
DG Internal Market, Industry
Entrepreneurship and SMEs

(e-sign)
Aurel Ciobanu-Dordea
DG Environment