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Sent: Wednesday, June 26, 2024 8:40 AM
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Subject: RE: Meeting request - PFAS restriction proposal - Federation of Swiss Watch Industry

Dear [REDACTED]

Thank you for contacting me on behalf of the Federation of the Swiss Watch Industry.

I remember very well the discussion on the (potential) derogation for the use of PFHxA in epilames in watches. As you know, the Commission decided to propose a targeted restriction for several PFHxA applications (like consumer textiles, consumer mixtures, food contact materials, cosmetics), not including the use of PFHxA in watches. The PFHxA restriction will soon be adopted by the Commission and published in the Official Journal. All uses not covered by the PFHxA restriction should be considered (again) in the broad PFAS restriction proposal ('UPFAS').

At this moment, the UPFAS dossier is assessed by RAC and SEAC in batches. The Commission is observer in this process. Giving your request on this specific use, I would like to suggest contacting ECHA.

Kind regards,



European Commission

DG for Internal Market, Industry, Entrepreneurship and SMEs
REACH



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From: [REDACTED] <[\[REDACTED\]@kreab.com](mailto:[REDACTED]@kreab.com)>

Sent: Monday, June 17, 2024 3:59 PM

To: [REDACTED] <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>

Cc: [REDACTED] <[\[REDACTED\]@kreab.com](mailto:[REDACTED]@kreab.com)>

Subject: Meeting request - PFAS restriction proposal - Federation of Swiss Watch Industry

Dear [REDACTED]

please allow me to contact you on behalf of [the Federation of the Swiss Watch Industry](#) (Swiss FH) with regard to the REACH restriction proposal on all PFAS substances.

The FH, based in Biel (Switzerland), is the **leading trade association of the Swiss watch industry**, representing about 440 members that account for over 90 per cent of all Swiss watch manufacturers (including finished products, watch movements and components). With around 61,000 persons employed in the sector, the Swiss watch industry represents the bulk of the European watch industry and is a major client of the European watch component supply industry. Indirectly, tens of thousands of jobs in the retail trade in the EU are dependent on the Swiss watch industry and the sale of its products.

In the context of the [REACH restriction proposal on PFHxA, its salts and related substances](#), the Swiss FH and its members, including The Swatch Group, supported a derogation for '*epilames used in watches*'. This derogation was included by the Dossier Submitter in the restriction proposal, as well as [supported](#) by the Risk Assessment Committee (RAC) and the Socio-Economic Assessment Committee (SEAC).

The Swiss FH has submitted two separate contributions to the all PFAS restriction. The first submission reflects all the relevant information in support of the derogation request for *epilame* and *epilame* mixtures (#Ref: bfce9536-1dd2-492e-8a75-bdf548798041). The second submission addresses the time-limited derogation request for the use of *lubricants* in internal watch parts (#Ref: 77356315-00da-40bb-a501-e1e438b083ef).

The technical experts of Swiss FH and member companies would very much appreciate the possibility to discuss these derogation requests with you at your earliest convenience.

We look forward to hearing from you and, in the meantime, remain at your disposal should you have any questions or remarks.

With kind regards,



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