

Attendance:

Agenda	Discussion	Action Points
1. Info from the members	_____ : _____ of enforcement agency VL as co-rapporteur for ECHA forum on the UPFAS restriction. Addition from _____ : He will help _____ (SEAC rapporteur of the restriction) for his work as co-rapporteur	
2. Presentation and discussion of the UPFAS restriction	<u>Regarding the scope of the restriction</u> _____ presents slides on the UPFAS dossier _____ on Scope: BECA has more expertise, VITO has expertise, important there are only very limited exclusion and that it is necessary to check what this exclusion is and that there are no 'escape' routes. _____ question: regional level the availability of performing technology (filtering, sanitation) is important to take into account when assessing the risk, has this been done? _____ response: The restriction does not present certain means to limit the exposure. Reporting; might help enforcement, but no measures in the restriction that would oblige companies to limit exposure. _____ : Site specific management is included in the proposal and in the dossier all available analytical methods are listed. _____ : notes that the pfas are not considered at hazardous waste. Even if there would be a prevention of emission, that the filter would go into waste, no means to consider this as hazardous waste. As such, a number PFAS are not classified under CLP. _____ : COM was instructed in last revision of POP, all POP waste should classify as hazardous waste. _____ : import is also in this restriction? Also wonders whether this will not just shift production to outside of the EU, which will then	Action points: BECA will check with the Dossier Submitters on the reasoning of excluding certain PFAS from the scope Check with Product Policy and internal affairs whether national codes for buildings exist and whether PFAS are included Identify which companies could be having derogations from the restrictions to link this with the permitting Check in the dossier whether all derogations are properly justified and whether we could contribute data/info to refute them CCIM members will collect data that could be relevant to include into a BE comment into the

	leach into EU again (either via import or envi transport) █: Yes import is included. And international challenge is indeed difficult. This restriction could however be an interesting precedent for international level. █: the technical dossier, in the beginning it did not cover the manufacture (leaves door open to export), need to support that the ban is on manufacture (and use, and market). █: technical stock can also mean, products which are currently on the market: for example, building contains products which contain pfas. Look to stock as a very broad term. <u>Analysis of the current restriction proposal text</u> <u>Paragraph 4 – unlimited derogations</u> █: this does not include DU (biocides, pesticides, human veterinary). █: what does this include? The active substance. █: under reach for medical products, authorities can still act on this, if problem for envi, so we could check whether its needed to have specific actions for these uses. <u>Paragraph 5 – temp derogations</u> National safety standards. █: Whats the situation for national safety standards in BE? => █ from product policy could help. █: What are those National Safety standards? Related to defence?. Linked to F-gas? █: stop talking about F-gases, but fluorinated gases. █: Impregnation in homes (for shoes) covered? █: derogations are for industry and professional uses mainly. █: in most cases are not derogated. Or highly technical application or professional or industrial use. The impregnation exemptions mainly concerns the PPE. █: for permit writers it is important to know what it is, which companies use it? It's very clear what this derogation is, but what are cleaning fluids. We need to analyze this. In other derogations, when there are derogations, there is something which lowers emission by controlled close measurements. █: annex A	PC. New data on emissions/monitoring as well as data on alternatives and analytical methods are interesting to communicate Deadlines: Info for first comment: 22/03 (depending on whether specific info request will be send) First BE comment: 22/04 Note that data regarding Risks and Hazards on PFAS are most interesting to send early in the consultation process
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cannot include everything we will need. Dona: according MP what is exempted should be reported, COM proposal did not include intermediary. [redacted]: promoting restriction route over authorization route.

[redacted]: 3M, permit on ultra-short PFAS, made their own toxicity report. It's important to know if these 3M are within this restriction, or derogated. That we want to know.

[redacted]: when you say that only these exemption are substantiated for the restriction, if the authorities have data on these relation to emission and data. [redacted]: derogations are only based on strong, weak ... evidence on alternatives, so env emissions are not taken into account. Potential derogations, waiting on public consultation, use the methodology by the dossier submitter. What is behind this? If we receive information on this, that derogation is needed, but only comes from one source and cannot be backed up by other data sources, then I think the conclusion will be not to be sufficiently strong.

[redacted]: alternative is important, are alternative technologies also covered? [redacted]: seems kind of clear that all types of alternatives should be taken into account. Also take in mind what kind of derogation, specific product vs a use. Having more information is helpful, but some of these decisions have big data gaps.

Essential use discussion

[redacted]: in past, we thought restriction would target PFAS except essential uses. Does someone has something to say on this? [redacted]; the current regulation does not provide a possibility for using this concept in restrictions. Together with SPF economy a call for tender is being announced on essential use (own def for essential use). PFAS would be taken as an example in this project. [redacted]: explain to politics and society, difficult to explain in another way then just referring to essential use. Now we have to talk about mitigating effect on society. Regions included in steering com? Goals of study? [redacted]: the idea is ones we have this

framework we will try to propose to BCR when the REACH revision will be happening.

Derogation discussion

█: for the derogations, there are things in it for example piping and tubing with PFAS vs drinking water rules, this does not seem like a sensible derogation. █: PFAS in drinking water tubes, do they lead to exposure?

█: one of the action points will be trying to identify if all the proposed derogations are sensible and whether we could contribute data/info to refute these.

Further planning and follow-up

█ presents slides with some planning proposals.

█: timeline will be delayed. End of 2024 opinion of committees at the earliest, timing as put in the slides should therefore be moved up 1 year at least.

SSbD discussion

█: questions whether it has been assessed whether the proposed alternatives are (less) hazardous than the PFAS? Has the SSbD been taken into account.

█: SSbD will not be legally binding, COM informed that ssbd at the level of voluntary measure.

█: currently the framework is still in development, therefore was not possible and plausible to do this kind of assessment for all the alternatives.

REACH registration discussion

Discussion on the fact that currently there is an obligation for industry to notify that PBT and vPvB substances are present in articles and how there are challenges in the current workings of REACH to properly assess, check and enforce that all the data is available for these kinds of substances. Important to note that the

PBT/vPvB classification is a long and burdensome process, and that only few substances up to date have been classified.

The revision of REACH and CLP will be important ways to improve this process and broaden the scope to vPvM and PMT.

█: explains he is the BE member of the PBT expert group at ECHA. Further explains he has been working on substance evaluations of several PFAS substances (including 3M substances). █ invites the CCIM members to contact him to discuss this issue on PBT and vPvM further with him.

█ and █ clarify that these kinds of communications are best done via the CCIM network to ensure correct information exchange.

Discussion/brainstorm on input of the CCIM to the PC

█: it is advised to group the comments of the CCIM into a BE comment in order to ensure an efficient communication of the info collected.

█: appendix E4: available analytical methods, also intention to give information on that?

█: if it is identified that methods are missing or incomplete this can certainly be included in a BE comment.

█: Link between emission sources and exposure is valuable to include into a comment.

█: new data on waste water has been collected since 2021, this will be shared with the group for sending into the PC.