

From: [REDACTED]
To: [REDACTED] (ENV)
Cc: [REDACTED] (GROW); [REDACTED]
Subject: Follow-up to questions on EU POP Regulation, presentation with background information/questions (confidential)
Date: 23 March 2021 15:35:56
Attachments: [image001.png](#)
[image222994.png](#)
[CONFIDENTIAL_Heroflon_PTFE_micropowder_presentation_March_2021.pdf](#)

Dear [REDACTED]

I hope you are well. I revert to you regarding the EU POP Regulation on PFOA and the questions related to different scenarios for the production of compliant PTFE micropowders in the EU after July 2022.

On behalf of Heroflon, a subsidiary of Daikin, please find enclosed a confidential presentation with additional background information, outlining the current situation and the potential business model(s) for the production of compliant PTFE micropowder in the EU after July 2022. In anticipation of the upcoming review of the current derogation for PTFE micropowders, the presentation also outlines the questions that Heroflon has in relation to the legal and regulatory framework after July 2022. Please note that the presentation should remain confidential as it contains sensitive company information.

We hope that the enclosed presentation is useful for you and your legal service in assessing these questions. As mentioned, Heroflon is trying to better understand whether the production of compliant PTFE micropowders in the EU, using the processes outlined in the presentation, would be possible after July 2022 under the EU POP Regulation as it stands now, or whether additional derogations may be needed. The questions in the presentation notably relate to the intermediary steps of the overall process to produce compliant PTFE micropowders.

Heroflon would be happy to hold a call/web-based meeting to further discuss the content of the presentation and go through the questions, if you were to find that useful.

As before, we have copied [REDACTED] from DG GROW because the questions asked in the presentation are also likely to be pertinent for the C9-C14 REACH Restriction.

Thank you in advance for your consideration and we look forward to your reply. If you have any questions in the meantime, please feel free to contact me.

Kind regards

[REDACTED]



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EU Transparency Register ID Number: 1078390517-54

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From: [REDACTED]@ec.europa.eu>

Sent: jeudi 4 février 2021 15:22

To: [REDACTED]@kreab.com>

Cc: [REDACTED]
[REDACTED]

Subject: RE: Follow-up to questions on EU POP Regulation

Dear [REDACTED]

I remember the question you refer to. Our lawyer for the POPs Regulation is still looking at it. Indeed it would be useful to have more information on the specific case. It would be OK to receive it by end of February/beginning of March.

Regards

[REDACTED]

From: [REDACTED]@kreab.com>

Sent: Wednesday, February 3, 2021 10:51 AM

To: [REDACTED] (ENV) [REDACTED]

Cc: [REDACTED]
[REDACTED]

Subject: Follow-up to questions on EU POP Regulation

Dear [REDACTED],

Please allow me to contact you with regarding to EU POP Regulation on PFOA, and as a follow up to your exchange with my colleague [REDACTED] who had sent you a set of questions related to different scenarios for production processes to produce compliant PTFE micropowders in the EU.

As mentioned at the time, we are trying to understand, from a legal and regulatory perspective, whether/which of the various scenarios would be allowed under the POP Regulation, without a specific derogation being required for after July 2022. Some of the

scenarios could involve transport between two different legal entities to allow for further processing to ensure the substances comply with the POP Regulation.

We would like to let you know that we are working with Kreab's client (Heroflon, a subsidiary of Daikin based in Italy) in putting together materials and additional information that we hope will be useful for you and your legal service in assessing the questions that Kreab submitted to you. The materials would provide additional background information to the questions and also summarise and explain the questions again on behalf of the client (on a confidential basis). T

The plan would be to send you that information and the materials at the end of February/in early March. Would this timeframe be acceptable to you?

As we understand, this information would be relevant in the light of the upcoming review of the derogation for PTFE micropowders.

We have copied [REDACTED] at DG GROW as the same questions about the possible need for additional derogations are likely also to be pertinent for the C9-C14 REACH Restriction and its future review.

We thank you very much in advance for your consideration and time.

Kind regards

[REDACTED]



[REDACTED]

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