

**From:** [REDACTED]  
**To:** [REDACTED] (ENV)  
**Cc:** [REDACTED]  
**Subject:** PFOA POP Regulation / C6 on-site intermediates  
**Date:** 09 April 2021 10:54:35  
**Attachments:** [image798254.png](#)  
[C6 telomer production process C6 on site intermediates.pdf](#)

---

Dear [REDACTED],

Please allow us to write to you on behalf of Archroma, producer of specialty chemicals including C6 fluorotelomers, concerning the POP Regulation on PFOA and how it applies to C6 on-site intermediates.

At the Archroma manufacturing site in Gendorf, Germany, there are **five different C6 on-site intermediates used in the production of C6 fluorinated polymers**. These are shown in the attached slide.

In terms of C8 concentrations, it ranges from max 20% (in one intermediate), to less than 20 ppm (in the four other intermediates).

It is our understanding that C6 products, including intermediates, do not fall within the scope of the Stockholm Convention.

However, we would like to clarify if an annotation and subsequent notification are required for C6 on-site intermediates containing C8 levels above the C8 UTC levels set in the EU POP Regulation on PFOA.

Such annotation/notification procedure is described in Article 4 paragraph 3 of the EU POP Regulation. It is not clear to us if it applies to C8 on-site intermediates only (like in the Stockholm Convention), or also to on-site intermediates containing C8 residues beyond the UTC levels of the EU.

At present, the POP Regulation on PFOA provides a derogation for C6 transported intermediates under SCC, with a limit for C8 at 20 ppm.

Our understanding is that neither the Stockholm Convention, nor the POP Regulation on PFOA intend to prohibit the production of C6 fluorotelomers. Yet, depending on the answer, this may unintentionally impact C6 production in Europe.

We would very much appreciate the opportunity to discuss this issue with you at your earliest convenience.

We thank you in advance for considering our request and look forward to hearing from you,

Best regards,

[REDACTED]



Partner

Kreab

2/4, Rond-Point Schuman, BE-1040 Brussels, Belgium

Tel

Mob

@kreab.com

[www.kreab.com](http://www.kreab.com)

EU Transparency Register ID Number: 1078390517-54

This communication is only intended for the use of the individual or entity, to which it is directed and may contain information that is privileged, confidential and exempt from disclosure under applicable law. If received in error please notify us immediately, delete this e-mail and destroy all copies.