

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: List of substances for PFOA amendment and test method
Date: 22 July 2020 14:38:00
Attachments: [image001.jpg](#)
[image003.jpg](#)
[image005.jpg](#)
[image008.jpg](#)
[image009.jpg](#)

Dear [REDACTED]

A medical device that complies with exemption 5c requirements can benefit from it until 4 July 2023.

Derogation 5e allows the use of PFOA to manufacture fluoropolymers used in the production of specific membranes but it does not allow to use PFOA to treat the membranes (if this is the meaning of your question).

Concerning the analytical methods, we do not intend to work on standardisation but, as you are probably aware, the Forum is going to update the compendium of analytical methods for restrictions and this work will include also PFOA.

If you refer to the public consultation on some exemptions for C9-C14 PFCAs and PFOA, the question on analytical methods related to the possibility to detect low level of impurities in PFAS materials.

Regards

[REDACTED]

From: [REDACTED]@euratex.eu>
Sent: Friday, July 10, 2020 5:05 PM
To: [REDACTED]@ec.europa.eu>
Cc: [REDACTED]@ec.europa.eu>; [REDACTED]
[REDACTED]@euratex.eu>
Subject: RE: List of substances for PFOA amendment and test method

Dear [REDACTED]

Thanks again for your swift reply.

I have a few other questions of clarification:

- As you know, certain medical equipment falls both in the scope of MDR and PPE Regulations; in this case particularly considering the widespread demand for medical equipment (with unpredictable future scenario), EURATEX would welcome a clarification that *medical protective textiles* falling under both Regulations would conform to the derogation specified in 5c) with expiration date 4/7/2023
- EURATEX would also welcome a further clarification on derogation 5e) that currently exempts manufacturing of PTFE and PVDF for the production of certain membranes to also apply to *final products*

- Regarding test methods, we understand from our Members and collaborating testing labs that a harmonised test method is still not available, however work is currently being done in CEN with ongoing discussion on the scope of substances. Will the Commission recommend a test method for enforcement purposes considering that the amendment is already applicable and ECHA Forum is looking into further enforcement activities for this issue?
In addition, I noticed that ECHA is consulting on PFAS analytical methods by 24 July. Will this facilitate harmonisation of a test method?

Thank you in advance and nice WE,

[Redacted]

[Redacted]

[Redacted] Sustainable Businesses

Euratex-LOGO-small



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From: [Redacted] <[\[Redacted\]@ec.europa.eu](mailto:[Redacted]@ec.europa.eu)>
Sent: jeudi 2 juillet 2020 10:54
To: [Redacted] <[\[Redacted\]@euratex.eu](mailto:[Redacted]@euratex.eu)>
Cc: [Redacted] <[\[Redacted\]@euratex.eu](mailto:[Redacted]@euratex.eu)>
Subject: RE: List of substances for PFOA amendment and test method

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Dear [Redacted]

There is a Q&A on ECHA website on this. It gives you the links to the Background Document where you find an indicative list.

<https://echa.europa.eu/support/gas-support/browse/-/qa/70Qx/view/scope/REACH/Restrictions>

Additionally, POPRC prepared a non-exhaustive list of substances included (attached). Please notice that POPRC should review this list and that the entry in the POPs Regulation is slightly different from the substance identification of the Stockholm convention. This is because if there were substances covered by the REACH restriction and not covered by the Stockholm Convention, we have included them.

Kind regards

[Redacted]

From: [REDACTED] <[\[REDACTED\]@euratex.eu](mailto:[REDACTED]@euratex.eu)>
Sent: Wednesday, July 1, 2020 3:08 PM
To: [REDACTED] <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Cc: [REDACTED] <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] <[\[REDACTED\]@euratex.eu](mailto:[REDACTED]@euratex.eu)>
Subject: List of substances for PFOA amendment and test method

Dear [REDACTED]

Hope you are well.

Lately, we are receiving a lot of questions and concerns from our Members regarding the test method (or lack thereof) and list of substances to test in textiles for PFOA presence.

Particularly, the testing labs are faced with ambiguity over the substances in scope; I understand that the PFHxA proposed restriction has a very useful [indicative list](#) of substances. Does the PFOA amendment have something similar?

This will be extremely important for the upcoming [REF project](#) which might investigate PFOA in textiles, among other things.

Kind regards,

[REDACTED]

[REDACTED]

[REDACTED] | Sustainable Businesses

