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Sent: mardi, 28 novembre 2023 15:56
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Cc: ██████████ (SPF Santé Publique - FOD Volksgezondheid); ██████████ ██████████
Subject: RE: Feedback on deadline for PFOA POP entry

Recently we received similar concerns from our Swedish colleagues on this PFOA entry for firefighting foam stocks (see blue text below).

Many thanks in advance for your feedback!

We would like to share some experience from our side as well, Sweden has rather similar experience as FI that stakeholders will have problems meeting the 2025 target and we are also uncertain whether the requirements have reached all related stakeholders.

For years, Swedish authorities have propagated to stop using AFFF:s and PFAS-containing ones in particular. AFFF use has decreased substantially, and many Civil Protection services has stopped using foam completely, and today, only a few percent of fires are extinguished using foam.

The Swedish Contingencies Agency has since 2022 a government assignment to administer the collection and destruction of PFAS-containing AFFF:s in stock at the Civil Protection services. Funding for PFAS-containing AFFF-destruction comes from the Swedish EPA budget post - prevention of contaminated land. Half-time description of the project at the Swedish EPA website (in Swedish). Today's figure: about 320 tons AFFF is destroyed and ¾ of civil protection services joined. The situation in the private sector is unclear, but most likely amounts of AFFF are at least in the same order of magnitude as in the Civil Protection services.

The Swedish EPA will, before the end of the year, publish guidance for enforcement of fire extinguishing actors (both commercial and public ones).

The Contingencies Agency has launched several pilot studies addressing efficiency of different techniques to clean and relining equipment (foremost tanks and piping of firefighting trucks), and some Civil Protection services has done monitoring pre and post cleaning of equipment.. In most cases recontamination occurred after a period of time - concentrations increased continuously to reach tens of thousands ng PFAS11 per litre after two months.



Tel:



The background documents and transition manuals are freely available on the site if you find them helpful. You can disregard the disclaimer: the deliverable have been approved on the working group level by all 8 Arctic countries. It will likely take some time before they can be adopted on the ministerial level for reasons you all know. We will continue working on pilot projects in 2024 and gather further experiences on the transition.



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From: ██████████ (SPF Santé Publique - FOD Volksgezondheid)
Sent: mardi, 14 novembre 2023 10:58
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Subject: Feedback on deadline for PFOA POP entry

Dear CCIM PFAS WG colleagues,

We have received information from the German Competent Authority for POP regarding the concerns on the deadlines of certain PFOA uses that will no longer be derogated after July 2025.

More specifically it is asked whether other countries are experiencing similar challenges with stockpiles of certain uses, which could make it challenging to reach the July 2025 deadline. The following uses of PFOA are concerned for the 2025 deadline:

- photolithography or etch processes in semiconductor manufacturing,
- photographic coatings applied to films,
- invasive and implantable medical devices
- fire-fighting foam for liquid fuel vapour suppression and liquid fuel fire (Class B fires) already installed in systems, including both mobile and fixed systems

Could you inform us on whether you have similar concerns or have received these concerns from stakeholders?

FYI below you can find the exact question from Germany:

In the course of our reporting activities on stockpiles, we identified the following issue with fire-fighting foams containing PFOA.

The enforcement authorities informed us that many companies will not be able to meet the deadline of July 4, 2025 due to different reasons: some companies were not aware of the deadline; some underestimated the effort involved; some did not follow the regulations as a whole; in some cases, there is probably also a lack of financial resources. This is in line with the feedback from a consultant to the fire departments with whom we are in contact. According to his estimate, around 2000 systems in Germany will be affected and would be non-compliant from July 5, 2025.

What is the experience with this issue in your country? How do we want to proceed? Is a request for an extension of the deadline, also for the Stockholm Convention, an option?

Kind regards,

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