

From: [REDACTED]
To: [ECHA Management Board](#); [ECHA EQ](#)
Cc: [REDACTED]; [REDACTED]; [REDACTED]
Subject: Conformity check of the Annex XV Restriction Report Proposal for PFASs
Date: 08 March 2023 22:34:33
Attachments: [image179863.png](#)
[White Paper - Conformity Check - Annex XV PFAS Restriction Report - 08.03.2023 - FINAL.pdf](#)

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Dear ECHA Secretariat,

We refer to the "*Annex XV Restriction Report Proposal for a restriction for Per- and polyfluoroalkyl substances (PFASs)*" and its Annexes ("the Proposal"), submitted to ECHA on 13 January 2023 and officially published on 7 February 2023.

We understand that the ECHA's Committee for Socio-Economic Analysis ("SEAC") and Committee for Risk Assessment ("RAC") will respectively meet on 10 March and on 15 March 2023 to discuss the content of this Proposal. We understand that in the context of these meetings, the Committees will vote on the conformity of the Proposal with the requirements set in Annex XV of REACH Regulation, so-called "conformity check procedure".

However, we believe that the Proposal should not move forward in the REACH restriction procedure as it appears legally flawed for the reasons set out in the *attached document*.

In order to ensure due process, we kindly ask the ECHA Secretariat to share this document with the RAC and SEAC members ahead of their respective meetings.

If the RAC and SAC members consider that the Proposal does not conform, they should send the Proposal back to the Dossier Submitters so that the latter may bring it in compliance within 60 days of receipt.

May we please ask you to acknowledge receipt of this email?

We thank you in advance for your collaboration and we look forward to hearing back from you.

Best regards,

[REDACTED] / [REDACTED]

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