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**Comments from the Swedish Armed Forces,
Department of Defense Inspector regarding the
Reach Annex XV report Proposal for restricting Per-
and polyfluoroalkyl substances (PFAS)**

Department of Defense Inspector (FIHM) supervises compliance both with current uses of hazardous substances in products and waste, and contaminated areas related to The Swedish Armed Forces operations. We therefor are responding to the proposed PFAS-ban with the focus of reducing the risk of future contamination of land and water.

FIHM believes proposed restricted use of all forms of PFAS is a good first step towards long term reduction of PFAS to the environment and reduced risks to human health. Previous attempts to restrict uses of individual PFAS such as PFOS, PFOA and PFAS-200 has partially resulted in swapping PFAS compounds to other PFAS. The proposed total ban makes swapping ineffective. However FIHM:s believes that the proposed limit values are still too high for non-containable uses where contact or discharge to the environment can be expected during or after use.

Any level of PFAS in products that during or after use can result in concentrations over guideline values for drinking water, soil, food for human consumption, or is over the threshold EQS value for PFAS needs to be assessed and addressed in the FIHM supervision of The Swedish Armed Forces operations. From a supervision point of view the proposed limit values 25 ppb (individual

(MGF)

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PFAS), 250 ppb (sum of measurable PFAS) and 50 ppm (total flour) are much too high compared to the actual risks during and after use. Transparency is essential to ensure proper handling, storage and waste management and to be able to decide when additional treatment of discharge, waste or emissions is needed. With today's legislation, according to REACH, manufacturers and sellers of products are only required to declare content of hazardous substances when above limit values. With the current labelling requirements both professional and laymen users risk using products in accordance with product instructions and still be liable for damages to health and the environment according to Polluters Pays Principle. To ensure that the Swedish Armed Forces can make informed choices and take necessary precautionary measures this legislation gap needs to be addressed. FIHM proposes therefor that, in addition to REACH, a mandatory requirement to manufacturers and sellers of products to disclose all content of PFAS in the products in the product information and/or safety sheets, especially when below ECHA:s proposed limit values for products.

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Distribution list

ECHA (via webpage: <https://comments.echa.europa.eu>)

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