

From: [REDACTED]
To: [REDACTED] (ENV)
Subject: RE: ?RE: ?RE: Request to clarify scope in Commission Delegated Regulation (EU) 2020/784
Date: 06 July 2020 18:25:15
Attachments: [image001.jpg](#)
[image003.jpg](#)

Dear [REDACTED],

Thank you very much for looking into this and for keeping me informed. I really appreciate your help and responsiveness!

We will be monitoring the website "Have your say" for the opening of the public consultation period and plan to provide input.

Best regards,

[REDACTED]

From: [REDACTED]@ec.europa.eu [REDACTED]
Sent: Monday, July 6, 2020 11:53 AM
To: [REDACTED]<[REDACTED]@chemours.com>
Subject: ?RE: ?RE: ?RE: Request to clarify scope in Commission Delegated Regulation (EU) 2020/784

External email. Confirm links and attachments before opening.

Dear [REDACTED]

I have now received the view of ECHA on the exemption for the transported isolated intermediates for the production of C6 alternatives, and the wording of the C9-C14 PFCAs restriction appears to be the most appropriate. For this reason, we'll correct the wording of the POPs Regulation with our next amendment. There will be a public consultation on this amendment towards the end of July, on <https://ec.europa.eu/info/law/better-regulation/haveyoursay>

Regards

[REDACTED]

From: [REDACTED]<[REDACTED]@chemours.com>
Sent: Saturday, July 4, 2020 12:04 AM
To: [REDACTED] (ENV) [REDACTED]<[REDACTED]@ec.europa.eu>
Subject: RE: ?RE: ?RE: Request to clarify scope in Commission Delegated Regulation (EU) 2020/784

Dear [REDACTED]

Thank you very much for following up with me and for providing the additional context. Your help is very much appreciated.

Best regards,

From: [REDACTED] <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)> [REDACTED]
Sent: Friday, July 3, 2020 11:18 AM
To: [REDACTED] <[\[REDACTED\]@chemours.com](mailto:[REDACTED]@chemours.com)>
Subject: ?RE: ?RE: Request to clarify scope in Commission Delegated Regulation (EU) 2020/784

External email. Confirm links and attachments before opening.

Dear [REDACTED],

On the point of the manufacture in the EU and possible export of non-compliant products, our lawyer confirmed the interpretation that we discussed.

On the different wording on the intermediate use exemption in PFOA and C9-C14 PFCAs, I'm still waiting for a clarification from ECHA.

On the interpretation of Art. 4(2), we published it today:
https://ec.europa.eu/environment/chemicals/international_conventions/index_en.htm
(under "Implementation measures").

Regards

From: [REDACTED] <[\[REDACTED\]@chemours.com](mailto:[REDACTED]@chemours.com)>
Sent: Friday, June 26, 2020 7:30 PM
To: [REDACTED] (ENV) [REDACTED]
Subject: RE: ?RE: Request to clarify scope in Commission Delegated Regulation (EU) 2020/784

Dear [REDACTED],

Thank you very much for checking and for responding so quickly.

Best regards,

From: [REDACTED] <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)> [REDACTED]
Sent: Friday, June 26, 2020 11:53 AM
To: [REDACTED] <[\[REDACTED\]@chemours.com](mailto:[REDACTED]@chemours.com)>
Subject: ?RE: Request to clarify scope in Commission Delegated Regulation (EU) 2020/784

Now I see that there was no mistake in the legal drafting because we copied exactly the same wording of the PFOA restriction. The wording of the C9-C14 PFCAs proposal is indeed different (but this proposal has not yet been translated into a legal text). I've asked ECHA for a clarification on the reason for the difference and I'll come back to you as soon as I receive a reply.

Regards

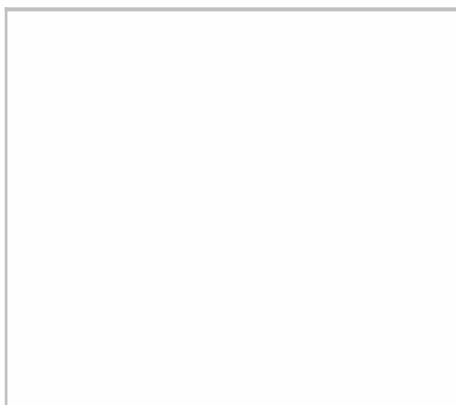
From: [REDACTED] <[\[REDACTED\]@chemours.com](mailto:[REDACTED]@chemours.com)>
Sent: Friday, June 26, 2020 5:02 PM
To: [REDACTED] (ENV) [REDACTED]
Subject: Request to clarify scope in Commission Delegated Regulation (EU) 2020/784

Dear [REDACTED],

Thank you very much for discussing with me earlier today. As promised, I am sending a comparison of text used in the delegated regulation and in the proposed (by SEAC) restriction language for C9-C14 PFCAs.

Text from specific exemption on intermediate use of other specification" No. 3 in Commission Delegated Regulation (EU) 2020/784: *"For the purposes of this entry, point (b) of Article 4(1) shall apply to concentrations of PFOA-related compounds equal to or below 20 mg/kg (0,002 % by weight) where they are present in a substance to be used as a transported isolated intermediate within the meaning of Article 3 point 15(c) of Regulation (EC) No 1907/2006 and fulfilling the strictly controlled conditions set out in Article 18(4)(a) to (f) of that Regulation for the production **of fluorochemicals with a carbon chain equal to or shorter than 6 atoms**. This exemption shall be reviewed and assessed by the Commission no later than 5.7.2022."*

Text from Conditions of the C9-C14 PFCAs restriction as proposed by SEAC:



The language in 4. (a) is much clearer as it specifies "...of fluorochemicals with a **perfluoro** carbon chain length equal to or shorter than 6 atoms;".

I would very much appreciate if you could clarify if the word addition "perfluoro" the POPs regulation (2020/784) exemption No. 3 is permissible so that the text would read "*...of fluorochemicals with a perfluoro carbon chain equal to or shorter than 6 atoms*".

Thank you very much for your consideration.

Best regards,



The Chemours Company
1007 Market Street; Office
Wilmington, DE 19899 (USA)



[LinkedIn](#) | [Twitter](#) | [Chemours.com](#)

This communication is for use by the intended recipient and contains information that may be privileged, confidential or copyrighted under applicable law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system. Unless explicitly and conspicuously designated as "E-Contract Intended", this e-mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-mail does not constitute a consent to the use of sender's contact information for direct marketing purposes or for transfers of data to

third parties.

<https://www.chemours.com/en/email-disclaimer>

This communication is for use by the intended recipient and contains information that may be privileged, confidential or copyrighted under applicable law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system. Unless explicitly and conspicuously designated as "E-Contract Intended", this e-mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-mail does not constitute a consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

<https://www.chemours.com/en/email-disclaimer>

This communication is for use by the intended recipient and contains information that may be privileged, confidential or copyrighted under applicable law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system. Unless explicitly and conspicuously designated as "E-Contract Intended", this e-mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-mail does not constitute a consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

<https://www.chemours.com/en/email-disclaimer>

This communication is for use by the intended recipient and contains information that may be privileged, confidential or copyrighted under applicable law. If you are not the intended recipient, you are hereby formally notified that any use, copying or distribution of this e-mail, in whole or in part, is strictly prohibited. Please notify the sender by return e-mail and delete this e-mail from your system. Unless explicitly and conspicuously designated as "E-Contract Intended", this e-mail does not constitute a contract offer, a contract amendment, or an acceptance of a contract offer. This e-mail does not constitute a consent to the use of sender's contact information for direct marketing purposes or for transfers of data to third parties.

<https://www.chemours.com/en/email-disclaimer>