

Helsinki, 23 April 2024

Vicky Cann
CEO
Rue d'Edimbourg 26
1050 Brussels
Belgium

Sent by email only: ask+request-14107-ce47ef95@asktheeu.org

Subject: Reply to your request for access to documents – Second batch

Reference: ATD/015/2024

Dear Ms Cann,

I refer to your request of 26 January 2024, registered on 29 January 2024, under the above-mentioned number.

Your request concerns access to:

"[...] the following documents related to lobbying on PFAS, per and polyfluoroalkyl substances. In particular I would like:

1. A list of all meetings/ discussions since 1 January 2022 between officials and businesses, trade associations, or think tanks where this topic was discussed.
2. Any records, minutes, preparatory briefings, or other notes of these meetings/discussions.
3. All correspondence since 1 January 2022, where this topic was discussed, exchanged between officials and businesses, trade associations, or think tanks."

ECHA has identified 53 documents to be disclosed. Twenty-seven (27) documents were disclosed in the 'reply to your request for access to documents – first batch' on 11 March 2024. The remaining 26 documents (second batch) are disclosed at this stage (see zip file attachment).

Decision

Based on Article 7(1) of the ATD Regulation¹

ECHA has decided to grant you partial access to 26 of the requested documents.

You can find the non-confidential versions of the documents enclosed in the zip file and listed in this letter.

¹ [Regulation \(EC\) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.](#)

Reasons

The exception provided by Article 4 (1)(b) of the ATD Regulation on the protection of personal data was found to apply to the names, signatures and contact details contained in the requested document. The necessity to have this data transferred for a specific purpose in the public interest, as required by Regulation (EU) 2018/1725, has not been established. Therefore, the information at issue has been redacted from all the documents.

Procedural history

On 16 February 2024, we informed you that the deadline for replying to your request had to be extended for 15-working days as your application concerns a large number of documents requiring different ECHA Services and third parties to be consulted. On 5 March 2024, we made a fair solution proposal in accordance with Article 6(3) of the ATD Regulation to extend the deadline by 30 working days to complete ongoing third-party consultations. Following a teleconference on 11 March 2024, it was agreed to proceed with your request in two batches with an extended deadline of 30 working days regarding the second batch (Wednesday 24 April 2024). The first batch of 27 documents was disclosed to you on 11 March 2024.

Means of redress

You are entitled to make a confirmatory application requesting ECHA to review this position by writing to the Executive Director of ECHA (P.O Box 400, 00121 Helsinki, Finland or executive-director@echa.europa.eu). This needs to be done within 15 working days, as applicable in your country, of receiving this letter.

Yours sincerely,

(e-signed)²

Head of Risk Management Unit I

Encl: See separate zip file attachment containing 26 disclosed documents.

² As this is an electronic document, it is not physically signed. This communication has been approved according to ECHA's internal decision-approval process.

List of 26 disclosed documents – ATD/015/2024 – Second batch

2021-12-06 CropLife Europe_Email_Received
2021-12-06_CropLife Europe_Email_Received_Attachment
2021-12-07 CropLife Europe_Email_Sent
2022-03-08_9_1A_EPEE webinar_Email_Thread
2022-03-08_9_1C_EPEE webinar_Email_Thread_ATT
2022-05-23_FW_ Letter from FETSA_LASTFIRE (fluorinated foam phase out)
2022-05-24_19_1A_GFL request_Email_Thread
2022-05-31_Newgate request_Email
2022-07-14_CropLife Europe_Email_Sent
2022-10-31 Willson Consulting to ECHA on PFAs exposure
2022-12-12_RE_ [redacted]'s attendance - accommodation - PFAS in FFF at RAC-62 REST WG
2022_07-13 Newgate request_Email
2023-01-26_13_Registration for 17 November Webinar on fluoropolymers
2023-02-27 Presentation by CETS
2023-03-08 White Paper on PFAS proposal
2023-03-08 White Paper - Fieldfisher to ECHA
2023-03-10 Fieldfisher to ECHA on PFAS
2023-03-24 Fieldfisher - ECHA Restriction Proposal for PFASs
2023-03-31 Reply Dir D to fieldfisher
2023-03-31 Response_Conformity check_Annex XV Restriction report_PFASs proposal
2023-07-07 Dynamesh to ECHA on PFAS submission
2023-07-07_85_PFAS submission-contact details
2023-09-18_Eurotox PFAS discussion
2023-09-20_FW_ ESIA - 20 September 2023_ 15_00 hrs - PFAS restriction
2023-06-07_RE_ LASTFIRE Steering Panel Meeting Helsinki Presentation
2024-01-29_207_PFAS restriction work plan - Transport sector