

Agenda	Discussion	Action Points
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1. Tour de table

(FPS Health and Environment)

- Ad-Hoc open BCR on PFAS
 - o Opportunity for stakeholders to present position on PFAS restriction
 - o Large interest (over 20 interventions)
 - o Mainly presence of fluoropolymer industry
 - o Many different sectors represented
 - o NGOs also present
- Study on PFAS in household textiles will be finalized in the coming weeks
- ECHA webinar of 05/04 on the restriction proposal
 - o Possible to rewatch online
 - o Q&A included, will also be shared in written the coming weeks
- Ad-hoc BCR on PFAS for authorities
 - o To discuss the current proposal and BE position with other BE authorities

(BXL)

- 2 campaigns organized on PFAS in Brussels (2021 and 2022)
- Second campaign at 11 sites
- Current or past PFAS emission sites
- VL guidelines are exceeded at 3 sites in the soil
- 5 sides for groundwater

Liste des sites étudiés dans le cadre des campagnes d'analyse PFAS						
Adresse site	année	Classe de sensibilité	Concentration maximale sol		Concentration maximale eau souterraine	
			PFOS (µg/kg)	PFOA (µg/kg)	Σ 20 PFAS (µg/l)	Σ Tous les PFAS (µg/l)
		Zone particulière	3,6	0,5	0,1	0,5
		Zone d'habitat	18	8,9	0,1	0,5
		Zone industrielle	110	643	0,1	0,5
Rue des Goujons 152-154 et Rue de la Petite-Île 1A à 1070 Anderlecht	2022	Zone d'habitat	2,5	0,5	0,302	0,302
Rue des Bassins 38, 60-64 et Rue Prévalaire 58-60 à 1070 Anderlecht	2022	Zone d'habitat	0,5	0,5	0,295	0,295
Chaussée de Mons 626-627 à 1070 Anderlecht	2022	Zone d'habitat	74	2	12,538	18,938
Avenue Hippocrate 92 à 1200 Woluwe-St-Lambert	2022	Zone d'habitat	3500	97	Pas d'analyse d'eau	Pas d'analyse d'eau
Avenue de l'Arbre Balton 251 à 1090 Jette	2022	Zone d'habitat	19	2,1	Pas d'analyse d'eau	Pas d'analyse d'eau
Rue du Foyer Schaerbeekois 36-38 à 1030 Schaerbeek	2022	Zone d'habitat	0,5	0,5	Pas d'analyse d'eau	Pas d'analyse d'eau
Rue Montagne aux Angles 35 à 1080 Bruxelles	2022	Zone d'habitat	0,5	0,5	0,02	0,02
Rue de la Carpe 55-57 et Rue d'Ostende 70-88 à 1080 Molenbeek-Saint-Jean	2022	Zone d'habitat	0,5	0,5	Pas d'analyse d'eau	Pas d'analyse d'eau
Avenue de l'Héliport 11 - 15 à 1000 Bruxelles	2021	Zone d'habitat	650	110	45,49	120,18
Rue du Dobbelenberg à 1190 Bruxelles	2021	Zone industrielle	2,7	0,4	0,297	0,3
Avenue de la Verrerie 17-23 à 1190 Forest	2021	Zone d'habitat	0,2	0,2	0,02	0,02
Chaussée de Neerental 164-172 à 1190 Forest	2021	Zone d'habitat	0,7	0,2	0,02	0,02
Rue Brodyère 6 à 1070 Bruxelles	2021	Zone d'habitat	0,2	0,2	0,025	0,034
Rue van Malder à 1080 Molenbeek-Saint-Jean	2022	Zone d'habitat	0,5	0,5	Pas d'analyse d'eau	Pas d'analyse d'eau
Site privé*	2022	Zone industrielle	0,5	0,5	0,140	0,339
Site privé*	2021	Zone d'habitat	0,2	0,2	0,026	0,026
Site privé*	2021	Zone d'habitat	21	0,4	2,11	2,11
Site privé*	2021	Zone industrielle	0,2	0,2	0,063	0,076
Site privé*	2021	Zone industrielle	180	0,2	46,47	46,49
Site privé*	2021	Zone industrielle	0,6	0,2	0,193	0,261
Site privé*	2021	Zone industrielle	2,8	0,2	0,14	0,16
Site privé*	2021	Zone industrielle	870	7,3	6,92	8,54

Légende du tableau

La classe de sensibilité se base sur l'affectation au PRAS (arrêté normes du 29/03/2018, M.B. 02/05/2018)

Valeur guide provisoire flamande

650

Dépassement de la valeur guide provisoire flamande

* Propriétaires et/ou exploitants ayant donné leur accord pour la participation à la campagne d'analyse PFAS mais n'ont pas souhaité que leur site soit identifié

Σ 20 PFAS (µg/l) = les PFAS de l'annexe III, partie B, point 3 de la directive relative à la qualité des eaux destinées à la consommation humaine

Σ Tous les PFAS (µg/l) = les PFAS quantitatifs détectables (projet WAC/W/A/025 dd 03/2022)

L'absence d'analyse d'eau sur certains sites est liée à la profondeur plus importante de l'eau souterraine sur ces sites

Press release:

[Des PFAS retrouvés sur 5 sites en Région bruxelloise \(environment.brussels\)](https://environment.brussels/nl/pfas-gevonden-op-5-sites-in-het-brussels-gevest)
[PFAS gevonden op 5 sites in het Brussels Gewest \(environment.brussels\)](https://environment.brussels/nl/pfas-gevonden-op-5-sites-in-het-brussels-gevest)

Highest values at firefighting sites

(VL)

- Cabinet is looking at developing a position on the proposal
- Still waiting on other colleagues for data to be shared, would like to have some more time
- PFAS event 2024
 - o budget is cleared, nr participants
 - o After summer location and program will be finalizing
 - o Focus for federal: on prevention --> product alternatives and substitution
 - o Sanitation and monitoring etc. will be the main topics
 - o Food safety will also be discussed

(WL - SPW)

**Wallonie
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19/04/2023

**State of Art on PFAS in soil and
groundwater**

Belgium - Wallonia

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19/04/2023
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More and more investigations, and it is only the beginning

→ Currently 16 polluted sites, with 2 sites concerned with depollution projects

→ Guidelines transmitted to soil experts (risk activities, investigation and analysis, limit values) >>> frequent updates following technical feedbacks published on our website
<https://sol.environnement.wallonie.be/home/documents/le-coin-des-specialistes-experts-laboratoires/polluants-non-normes-pnn.html>

→ Internal inventory for the administration to help us to identify PFAS risk sites >>> need to be improved before publication

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Textile, paper production and waste disposal

Internal inventory, no publication yet

→ On-going project: (shall begin in a few weeks)

- 1) identification of 50 high-priority PFAS risk sites
- 2) investigation of PFAS in soil and groundwater and monitoring of human and environmental targets

→ We must deal with human health risk analyses

- 1) Specific limit values only for PFOS and PFOA: current consolidation of these values
- 2) Interpretation of other PFAS concentrations: case by case approaches (PFDA, PFBA, PFPeA, PFHxA, PFHpA, PFNA, PFBS, PFPeS, PFHxS, PFHpS, PFNS, PFOSA, 6:2 FTS, 8:2 FTS, 10:2 FTS)



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Human Health risk analysis conducted

Limit values --> consolidate this with others

Interpret other concentrations

(VL – VMM)

- BBT for waste water is being developed
 - o Will be finished before summer
- Permit application 3M
 - o Ultra-short PFAS emission levels
 - o No info on characteristics --> like to have more clear view what they mean
 - o ECHA restriction dossier perhaps has more info and to be checked whether in the scope
- VITO study on analysis technique for ultra-short For WAC
 - o Non target and suspect screening
 - o TOPA on the precursors is also developed
- New draft proposal water framework directive → 4.4 ng/l for 24 PFAS
 - o Important to make link between water framework, IED and REACH restriction

Response by [redacted] (FPS economy):

- Annex B of the restriction for more info on hazards and risks, as well as on fully degradable PFAS that are out of the scope
- Referring to Apache article --> permit request by 3M
- On ultra-short PFAS → example of TFA (persistent and toxic)
- On the link between legislations: limit values might be different, but REACH restrictions is starting from precautionary principle

(VL – OVAM):

Link between REACH restriction and others → ALARA principle is being used in the food legislation

Not just use EFSA value everywhere but calculate to specific conditions of food and water etc. for exposure

Important to keep in mind practicality

(VL – OVAM)

Two questions:

- Did the BCR confidential session have similar interventions as non-confidential?
- Is it possible to update the list of analytical methods of the Annex XV dossier?

response:

- on the BCR: Confidential so cannot share details, but indeed similar interventions
 - o (FOD VVVL): confidential business info and finances are discussed during the confidential interventions
- On analytical methods: can submit additional info on other methods in the public consultation
 - o : Annex XV is a living document and can be adapted until Final Opinion is send to the Commission

(WL – SPW)

- Budget approved for monitoring
- BCR: fluoropolymers industry indeed very concerned
 - o Big problem if need to replace linings etc.
 - o However during ECHA webinar Q&A session -->restriction does not apply to products put on the market before entering into force
 - o : indeed no problem for products already in use, however for replacing these products alternatives would be needed
 - Problem of stockpiling should be considered

(FPS economy)

- PFAS study (market study in BE and are there alternatives)
 - o Call has not been launched yet
 - o Hopefully launch this month
 - o Expertise needed
- BBBC: substitution projects, PFAS as priority
 - o Already received questions on whether remediation techniques are in the scope
 - o As remediation is not federal but regional this is not in the scope
 - But shows interest for financing on these kinds of projects

(VL)

- PFAS in seafoam study finalized
- Position of PFAS indeed being discussed
- HBM adolescence study Zwijndrecht is being finalized
- On Remediation techniques: Knowledge center at VL level for PFAS is being set up
 - o Involves some stakeholders already, but could be enlarged

	Next week info session on BBBC project call, can VL send short reply? : will discuss with to prepare some lines	
2. Draft first BE comment on the public consultation	scrolls through the document and explains content. Important to note that this comment mainly focusses on sharing new data, any other comments on positions are not yet developed (and would not be useful without justification with data). indicates info on study of PFAS in foam can be added. asks at which stage it could be interesting to add considerations on the transition periods and on the socio economic assessment, and whether we can talk about essential use? : next comment could be more orientated at socio-economic aspects, on essential use it must be noted that it is not yet a legally binding concept so hard to use it at this stage for this dossier. Perhaps at a later stage when negotiating a proposal with Commission there could be some discussions on this. : essential use indeed not implemented yet, however precautionary principle has been used in the development of this dossier and thus could be used in a next comment to make sure that SEAC takes this into account. In general on the dossier its relevant to note that some derogations could be discussed, especially the ones linking to other legislation that are derogated for unlimited time (for example biocides and plant protection products). Important to note that these legislation do not necessarily take into account environmental concerns and thus it might be necessary to indicate that these concerns should be dealt with (either within that legislation or via REACH).	Further planning: additional comments on current BE comment until 28/04 COB. Then send to BCR for approval and submission by around 05/05. After submission of the first comment a second comment will most likely be developed for new data and potentially for inclusion of socio economic considerations.
Public Consultation on SEAC draft opinion on the PFAS in AFFF restriction proposal	presents the information note of the dossier with the specific information requests. asks what would be the deadline to submit potential input, specifically on the neighboring establishments question for SEVESO companies. : consultation runs until 15/05 so preferably few days before that date. Info note will be send to the members with request for input.	Request for input for a potential BE comment by 08/05 COB