

**From:** [REDACTED] ([ENV](#))  
**To:** [REDACTED]  
**Subject:** RE: open letter regarding transparency in safety sheets  
**Date:** lundi 13 juin 2022 11:33:00  
**Attachments:** [image002.png](#)  
[Reply transparency in SDS.pdf](#)

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Dear Ms [REDACTED],

On behalf of [REDACTED], please find attached a reply to your email concerning transparency in relation to the information on chemical content and in particular PFAS.

Kind [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]



European Commission  
DG ENVIRONMENT  
Directorate B- Circular Economy  
ENV.B.2 – Safe & Sustainable Chemicals

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**From:** [REDACTED]@ivl.se>  
**Sent:** Wednesday, April 20, 2022 3:32 PM  
**To:** CAB TIMMERMANS CONTACT <xxxxxxxxxxxxxxxxxxxxxxxxxx@xx.xxxxxx.xx>  
**Subject:** open letter regarding transparency in safety sheets

Dear Frans Timmermans,

I read your and your colleagues open letter on chemical strategy and safety sheets. I noted:

- Information in the Safety Data Sheets shall be provided for each such substance that is present at a concentration equal to or greater than 0.01 % by weight.
- Information should be provided for all substances that meet the criteria above, both classified and non-classified.

I agree fully that safety sheets are of utmost importance and need to be much, much more transparent, not only about the content of hazardous substances and necessity for safety measure, but also clear instructions on how spill and waste needs to be handled after use. I have many clients that still believe that they are safe from the polluters pays principal if they just read and follow the instructions in the safety sheets. But that is only true if the transparency is sufficient and the instructions are very clear. I have read many safety sheets for antifouling boat paints and they lack a lot of important information resulting in highly contaminated boatyards. Same thing with numerous PFAS containing products.

I am concerned that levels for PFOS and other PFAS is still way too high even at 0,01% to provide any safety net at all for these forever chemicals. Translated it would mean that a water diluted product can have a concentration of up to 100 000 000 ng/l PFOS or any other unregulated PFAS on the candidate list, and still it would not have to be listed on the safety sheets. Remember that PFOS is only forbidden if above 0,1% still since the guideline haven't been revised since 2006. PFOA was at least regulated at 25 ppb which is much lower than 0,01%. PFOS and PFOA were not reregulated in the new regulation for sum of PFAS-200, guideline value 25 ppb. I have seen labresults from old fire foam products and most of them were just below 0,1% so they never stopped using them and will keep using them until the PFOA ban Jan 1 2023. The buyers don't realize that they will still be responsible for the remediation if used because they still believe that they are safe to use if they follow the extinct instructions on the safety sheets. The drinking water standard for PFAS-20 including PFOS is set to 100 ng/l. A spill would have to be diluted up to a million times before being below drinking water standards and that does not take into account the amount of spill, only the concentration.

My conclusion is that a more reasonable transparency value on a safety sheet for any PFAS chemical should be somewhere around 10 ppb for the sum of short chained PFAS and perhaps 1 ppb for the sum of long PFAS. And PFOS and PFOA should be reregulated as soon as possible and included in the 200 and called PFAS-202. Even at these levels it would be a hazard if a large spill occurred since it would result in a accumulated amount in the ground and groundwater. I know it's a struggle to change the levels to 0,01% but I am hoping that the guidelines for transparency will be better adjusted to the risks

Again, keep up the good work changing the transparency of the safety sheets. I am hoping that the transparency will reflect the actual risk when used so people can make educated choices. A substance that is hazardous at picogram or nanogram levels should not be guided by the same guidelines as a substance that is hazardous at gram, milligram or microgram levels.

**Your truly,**

[Redacted signature]

Miljötillstånd och åtgärdsstrategier

**IVL Svenska Miljöinstitutet**

Environmental permits and treatment strategies

**IVL Swedish Environmental Research Institute**

Direct: [Redacted]

Telephone: [Redacted]

Website: [www.ivl.se](http://www.ivl.se)

