

From: [REDACTED]@croplifeeurope.eu>
Sent: jeudi 1 juin 2023 21:49
To: [REDACTED] (SANTE)
Subject: PFAS restriction - CLE input to ECHA and request for meeting
Attachments: CLE Final submission prior to RAC65 U-PFAS collated - 9 May 2023.pdf;
EXTERNAL - 34672 Persistence scientific assessment and risk management
safeguards under the Pesticide authorisation framework.docx

Dear [REDACTED],

Following our last discussion please find enclosed the CLE input made to the ECHA consultation on the PFAS universal restriction.

It's an extensive document following the ECHA strict template but the executive summary below provides the key points. We also provided the enclosed document detailing how Persistence is already taken into account under the Pesticide Framework and in a much more advance way compared to other vertical legislations.

I also take the opportunity to ask for a dedicated meeting to exchange with you and your team on several regulatory topics. Please let me know what a feasible date would be during the last week of June/first week of July. I'm thinking 1h30/2h max. We can be flexible (avoiding Mondays/Fridays if possible

Input to ECHA Executive Summary:

- A derogation for fluorinated packaging essential for safe handling of chemicals in regulated sectors should be introduced.
- Additional information is provided on biodegradation of PFAS substances which are not persistent and specified as out of scope of the restriction proposal.
- Derogations for intermediates should be introduced to avoid unintended loss of derogated substances.
- The wording for the active substance in Plant Protection Products derogations should be amended to avoid unintended loss of safeners and synergists, which are also subject to Regulation (EU) 1107/2009.
- Information on the agronomic importance of fluorinated active substances is provided in support of the time-unlimited derogation.
- A time-unlimited derogation for PPORD and not-yet-approved active substances should be introduced to avoid unintended loss of innovation.
- The universal PFAS restriction should remove manufacture from the scope of the restriction.
- Emission estimates and reporting requirements for Paragraph 4 active substances (and safeners) should be adjusted for molecular weight to avoid distorted interpretation.

Note: it also contains results of fundamental mechanistic study done to look if certain functional groups actually do degrade. Preliminary results (OECD summary report embedded) show some do, questioning why the PFAS definition is therefore so broad.

With kind regards
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