

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: 27 July 2021 09:45
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Contribution to PFAS-SEA activities

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Dear [REDACTED]

Thanks for informing and checking with [REDACTED] [REDACTED].

I understand the argument of 'your side of the fence', although in this case it might not be that clear given the PFAS FFF dossier as ice-breaker.

ECHA's support is highly appreciated (commenting on drafts, brainstorming etc) !

I wish you all a good summer season.

Kind regards,
[REDACTED]

[REDACTED]

Project manager REACH PFAS restriction
[REDACTED]

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From: [REDACTED] <[REDACTED]>
Sent: maandag 19 juli 2021 13:03
To: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
Subject: RE: Contribution to PFAS-SEA activities

Dear [REDACTED]

Apologies for how long it has taken to get back to you on your question. We needed to discuss this with [REDACTED] [REDACTED] our Director, and we now have [REDACTED] view.

ECHA can continue to support RIVM (and the other dossier submitters working on the PFAS restriction) with technical advice and feedback on strategic and methodological issues. However, ECHA needs to stay on 'our side of

the fence' and it is not possible to take a more active role in the project management of WP7 or in the primary drafting of outputs (commenting on drafts is OK).

Active participation in dossier development could create an expectation that MS can rely on ECHA to provide capacity should they face similar resource or technical problems in the future. This would not be possible. In fact, ECHA is encouraging MS to increase their capacity for restriction development (and the evaluation of proposals) given our own limited resources. We acknowledge that there may be a need for ECHA to play a greater role to provide additional training / guidance.

In addition, we do not have a mandate from the Commission to actively work on the development of the proposal (i.e. as a Dossier Submitter). Our mandate is to cooperate on methodological aspects relevant to the fire-fighting foams proposal. We note that the essential uses concept, which does not affect the fire-fighting foams work, is politically sensitive and the criteria are under development by the Commission. The Commission may not be willing to allow ECHA to work on a proposal underpinned by the essential use concept until the criteria are agreed.

Nevertheless, [REDACTED] currently has 20% of [REDACTED] time allocated to support the UPFAS project, and [REDACTED] has specific SEA expertise. We will ensure that for the remainder of 2021 [REDACTED] other tasks do not prevent [REDACTED] from meeting this time allocation and providing advice and feedback to the RIVM team as required. [REDACTED] as SEA coordinator, also remains available.

In terms of your question about consultants, we know of various consultants that have actively worked on the SEA-related parts of restriction proposals. Most recently [REDACTED] (ex SEAC member – now with eftec) worked closely with the Norwegian authorities on the development of the recently submitted restriction proposal for dechlorane plus. [REDACTED] has previously worked on PFHxS and PFOA restrictions. This could be a good place to start.

Sorry that we could not be more helpful.

Yours,

[REDACTED]

[REDACTED]
Senior Scientific Officer / Restriction Process Coordinator
Risk Management I / D3
European Chemicals Agency
P.O. Box 400, FI-00121 Helsinki, Finland
Tel. [REDACTED]

<http://echa.europa.eu/>



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From: [REDACTED] <[REDACTED]>
Sent: 30 June 2021 19:32
To: [REDACTED] <[REDACTED]>
Subject: RE: Contribution to PFAS-SEA activities

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Dear [REDACTED]

I will try to elaborate a bit. To be concrete: [REDACTED] is ill, and although not clear at this moment we expect that it will take some time before [REDACTED] is back. [REDACTED] was coordinating the WP7 activities in my team and it was about half of [REDACTED] work (0,5 fte).

WP7 consists of the following activities (and I indicate responsible persons for different tasks):

- SEA
 - o HIA ([REDACTED])
 - o EIA ([REDACTED])
 - o Cost assessment (new employee starting 1 sept)
- Essential use
 - o Post doc study [REDACTED]

[REDACTED] was coordinating the different tasks and also actively doing part of the work together with the others. If you look to the planning for the restriction dossier (see also attached), we are now going from the "investigating/research" part to the "drafting" part. Some the coming months we have to put text on paper for the elements shown above. See also column C in the excel file; many times [REDACTED] name is mentioned.

At this moment, I am looking for the possibilities to catch up with the work. [REDACTED] and I can (temporally) take over some coordinating tasks; [REDACTED] is doing lot of the content work (but [REDACTED] is also new member of SEAC; which takes a lot of [REDACTED] time). In my view, most urgent is to find somebody capable in drafting different parts for the restriction dossiers (together with RIVM colleagues).

Hope this clarifies and looking forward to the meeting on Friday.

Kind regards,

Ps Today we had a good WP7 meeting on the SEA approach, unfortunate [REDACTED] and [REDACTED] couldn't attend.

[REDACTED]
Project manager REACH PFAS restriction

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From: [REDACTED] <[REDACTED]>
Sent: woensdag 30 juni 2021 17:14
To: [REDACTED] <[REDACTED]>
Subject: RE: Contribution to PFAS-SEA activities

Dear [REDACTED]

Yes, we did discuss. We wondered if you would be able to elaborate a bit more the envisaged tasks, level of effort expected and timelines.

Would you be able to do this? We, or a consultant, would have a better idea of whether we could meet your needs.

[REDACTED]

[REDACTED]
Senior Scientific Officer / Restriction Process Coordinator

Risk Management I / D3

European Chemicals Agency

P.O. Box 400, FI-00121 Helsinki, Finland

Tel. [REDACTED]
[REDACTED]

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From: [REDACTED] <[REDACTED]>
Sent: 30 June 2021 17:54
To: [REDACTED] <[REDACTED]>
Subject: RE: Contribution to PFAS-SEA activities

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Hi [REDACTED]

Did you already discussed my request with your head of unit?

Thx
[REDACTED]

[REDACTED]

Project manager REACH PFAS restriction
[REDACTED]

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From: [REDACTED] <[REDACTED]>
Sent: dinsdag 22 juni 2021 17:15
To: [REDACTED] <[REDACTED]>
Subject: RE: Contribution to PFAS-SEA activities

Thanks [REDACTED]

I'll have a chat with my head of unit and see what we can do.

P

[REDACTED]
Senior Scientific Officer / Restriction Process Coordinator
Risk Management I / D3
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From: [REDACTED] <[REDACTED]>
Sent: 22 June 2021 18:01
To: [REDACTED] <[REDACTED]>
Subject: Contribution to PFAS-SEA activities

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Dear [REDACTED]

Due to a high workload on several chemical dossiers and understaffing due to illness, I have difficulties in finding enough capacity to work on the SEA part in the universal PFAS part.

I would like to ask if you see options to (partly) solve the issue. Important aspect is that we are looking for a person/organization familiar with performing a SEA within the context of REACH restriction. Internally we were discussing the following possibilities:

- Would somebody from the ECHA/SEA team be available? Is this something to investigate or is this simply not possible at all? (I am of course aware of your work on the FFF dossier)
- Would you recommend a consultant other person? Of course, I know consultants from Wood, RPA, Rambol etc. However, I would like to have somebody also available for setting up the approach, argumentation line, coordinating activities (rather than "only" delivering a report), so as part of our team.

Hope you can help.
Thanks,

[REDACTED]

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