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Comments for Annex XV restriction report:

Restriction on the manufacture, placing on the market and use of PFASs.

– Submission by a tip: tap e.V.

We thank the authorities of Germany, Denmark, the Netherlands, Norway and Sweden for their proposal from 22.03.2023 to restrict per- and polyfluoroalkyl substances (PFAS) and support their approach.

a tip: tap is a non-profit association that campaigns for tap water, against packaging waste and thus for an ecologically sustainable lifestyle.

We are concerned about the increasing and ubiquitous occurrence of PFAS in the environment. Investigations of groundwater in Germany in whose catchment area PFAS contamination is known PFASs were detected at more than 70% of the monitoring sites. PFAS threaten the sustainability and safety of our drinking water and our health, are difficult and costly to treat and remove from the environment once they have been released [1, 2, 3].

Therefore, we call for a complete and rapid ban on the use of PFAS of the entire group of substances that lead to the elimination of PFAS from the environment. It is a necessary step to drastically restrict PFAs in the environment and to exclude the spread of new substances from the PFAs group that could prove harmful in future research.

Possible regulatory measures to reduce the risk of PFAS to human health outside the regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) and the Regulation on Classification, Labeling and Packaging of substances and mixtures (CLP) e.g. new thresholds in the Drinking Water Directive (DWD), are not sufficient. This is shown, for example, by the transposition of the DWD into German law, where the established limit value for the sums of PFAS in drinking water is considered by experts to be insufficient for good protection of human health [2, 4] .

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To improve the effectiveness of the proposed restriction, possible temporary exemptions must be reduced to a minimum and the time periods for exemptions and phase outs must be shortened as much as possible.

With kind regards



Samuel Höller
Director

Sources:

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- [2] Brunn, H., Arnold, G., Körner, W., Rippen, G., Steinhäuser, K. G., & Valentin, I. (2023). Pfas: Forever chemicals—persistent, bioaccumulative and mobile. reviewing the status and the need for their phase out and remediation of contaminated sites. *Environmental Sciences Europe*, 35(1). <https://doi.org/10.1186/s12302-023-00721-8>
- [3] Domingo, J. L., & Nadal, M. (2019). Human exposure to per- and polyfluoroalkyl substances (PFAS) through drinking water: A review of the recent scientific literature. *Environmental Research*, 177, 108648. <https://doi.org/10.1016/j.envres.2019.108648>
- [4] EFSA CONTAM Panel (EFSA Panel on Contaminants in the Food Chain), Schrenk, D, Bignami, M, Bodin, L, Chipman, JK, del Mazo, J, Grasl-Kraupp, B, Hogstrand, C, Hoogenboom, LR, Leblanc, J-C, Nebbia, CS, Nielsen, E, Ntzani, E, Petersen, A, Sand, S, Vleminckx, C, Wallace, H, Barregård, L, Ceccatelli, S, Cravedi, J-P, Halldorsson, TI, Haug, LS, Johansson, N, Knutsen, HK, Rose, M, Roudot, A-C, Van Loveren, H, Vollmer, G, Mackay, K, Riolo, F and Schwerdtle, T, 2020. Scientific Opinion on the risk to human health related to the presence of perfluoroalkyl substances in food. *EFSA Journal* 2020;18(9):6223, 391 pp. <https://doi.org/10.2903/j.efsa.2020.6223>