

From: [REDACTED]@ksb.com>

Sent: Wednesday, August 30, 2023 11:47 AM

To: SCHREIBER Kristin (GROW) [REDACTED]@ec.europa.eu>; [REDACTED] (GROW) [REDACTED]@ec.europa.eu>; [REDACTED]@wilo.com>
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Subject: "How PFAS is legally banned from the environment without causing enormous harm to socioeconomic coexistence"

Importance: High

Dear Ms. Schreiber, Ladies and Gentlemen,

As a manufacturer of pumps, valves and drive technology, we believe that the currently escalating discussion about the restriction of PFAS by means of REACH regulation allows a chance to put the basic approach on a legally and methodically clean as well as economically sustainable basis.

The aim must be to prevent the spread of PFAS and the pollution of environment.

We believe the approach of the REACH regulation starts at the wrong end. A ban on the generation of PFAS may probably achieve the goal set but comes along with unacceptable socio-economic collateral damages.

We therefore propose that the environmental damage that can be caused by PFAS should be prevented where it is caused, for example in the products that enter the environment via the waste cycle. Through the regulated internal market the EU has the means to create the necessary rules to prevent the introduction of PFAS in the environment, without having to renounce the enabling character of PFAS for technological achievements (food industry, water supply, etc.).

The internal market rules are in the hands of DG GROW responsibility. Therefore, we address our request to you: Please get involved in the ongoing discussion as quickly as possible to prevent the looming disastrous result in the restriction of PFAS substances.

In return, we offer to promote broad support for a "PFAS-CE label" within the industry. We are no stranger to this and have built up a reputation beyond our own industry within the development of regulations under the Ecodesign Directive via the Europump association.

Attached to this letter you will find aspects of the PFAS discussion which motivated us to write it and we hope to move forward with a meaningful new legislative approach for the ban of PFAS.

We are ready to discuss this subject in more depth and to develop it further at any time.

Yours sincerely,



WILO SE

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Kind regards

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