

[REDACTED] [REDACTED]

From: [REDACTED]
Sent: 23 May 2022 15:53
To: ECHA Restriction PFAS in firefighting foams
Subject: FW: Letter from FETSA/LASTFIRE (fluorinated foam phase out)

Categories: ATD-15

Hi [REDACTED]

This was the invitation for the meeting [REDACTED] and I attended.

Best,
[REDACTED]

From: [REDACTED]@tanklagerverband.de>
Sent: 28 January 2022 12:04
To: [REDACTED]@echa.europa.eu>; ECHA Restriction PFAS in firefighting foams
[REDACTED]@echa.europa.eu>; [REDACTED]@echa.europa.eu>
Cc: [REDACTED]@ec.europa.eu>; [REDACTED]@fetsa.eu>
Subject: AW: Letter from FETSA/LASTFIRE (fluorinated foam phase out)

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Dear [REDACTED]
dear [REDACTED]

first of all let me thank you again for your confirmation to participate at our next Working Group Meeting on **Friday, 11th of February 2022 (15.00 – 17.00 CET)**.

Following pls find the required link to participate: [Klicken Sie hier, um an der Besprechung teilzunehmen](#)

Also the following information could be useful for you:

- The Working Group consists of representatives of fire foam manufacturers, the industry (users of foam), fire fighting consultants as well as trade associations
- I am representing the independent tank storage association in Germany (www.tanklagerverband.de)
- The Working Group convenes between 3 and 4 times per year and focusses on relevant topics in the fire fighting environment
- The overall scope of the meetings is the exchange of information on specific developments and best practices

One of the recent focal points we have been putting our attention on is the planned **restriction of fluorinated substances in foam concentrates**. While we support the transformation to non-fluorinated

foam concentrates in general we still have some concerns with regard to the suitability of the new generation of foam concentrates specifically concerning large surface fires.

In the past months we have followed the respective processes at EU level and have specifically monitored the preparation and evaluation process within ECHA and its supporting stakeholders (e.g. SEAC, RAC). We would appreciate if you could give us a short update regarding the current status of the envisaged restriction process on PFHxA substances. In this context you may expect the following questions from the Working Group members:

- What is the current status with regard to this dossier?
- What happens in the „opinion – making – phase“ und which stakeholders may be involved?
- What is the further timeline for the overall process?
- Can you disclose already anything with regard to transition periods specifically for fire foam concentrates?

Hope this message helps you „preparing yourself“ a bit for the meeting in two weeks time. Again, appreciate that you are available and willing to join.

In case of any questions on your side pls let me know at any time.

With kind regards / Mit freundlichen Grüßen

[Redacted Signature]

Geschäftsführer

UTV Unabhängiger Tanklagerverband e.V.
Georgenstraße 23
10117 Berlin

[Redacted Address]

www.tanklagerverband.de



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Von: [REDACTED] <[REDACTED]@echa.europa.eu>

Gesendet: Mittwoch, 26. Januar 2022 14:24

An: [REDACTED] <[REDACTED]@tanklagerverband.de>; ECHA Restriction PFAS in firefighting foams <[REDACTED]@echa.europa.eu>; [REDACTED] <[REDACTED]@echa.europa.eu>

Cc: [REDACTED] <[REDACTED]@ec.europa.eu>; [REDACTED] <[REDACTED]@fetsa.eu>

Betreff: RE: Letter from FETSA/LASTFIRE (fluorinated foam phase out)

Dear [REDACTED]

Thank you for your answer and the confirmation.

Kind regards,

[REDACTED]
Unit ND3 – Risk Management I
European Chemicals Agency
P.O. Box 400, FI-00121 Helsinki, Finland
Tel. [REDACTED]

[REDACTED]@echa.europa.eu

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



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From: [REDACTED] <[REDACTED]@tanklagerverband.de>

Sent: 26 January 2022 13:43

To: ECHA Restriction PFAS in firefighting foams [REDACTED]@echa.europa.eu>; [REDACTED]

[REDACTED] <[REDACTED]@echa.europa.eu>; [REDACTED] <[REDACTED]@echa.europa.eu>

Cc: [REDACTED] <[REDACTED]@ec.europa.eu>; [REDACTED] <[REDACTED]@fetsa.eu>

Subject: AW: Letter from FETSA/LASTFIRE (fluorinated foam phase out)

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Dear [REDACTED]

thank you very much for your (and Gretas) willingness and availability to participate at our Fire Fighting Foam Working Group Meeting on **Friday, 11th of February, 2022 (15.00 – 17.00 CET)**.

My name is [REDACTED] and I am the Secretary of the Independent Tank Storage Association UTV (Unabhängiger Tanklagerverband e.V.), located in Berlin. On the 11th of Feb I will be the moderator of the Working Group Meeting and I do appreciate very much that you and [REDACTED] will be participating at this meeting as our guests.

I will submit the respective type of questions to you by the end of this week. In case you do have any questions once having received my message pls feel free to contact me directly. The Agenda and some other details concerning the meeting will be sent to you as well.

With kind regards / Mit freundlichen Grüßen

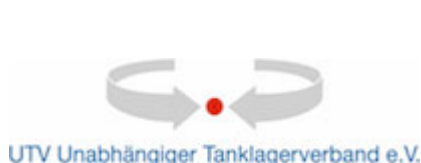
■■■■ ■■■■

Geschäftsführer

UTV Unabhängiger Tanklagerverband e.V.
Georgenstraße 23
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Von: ECHA Restriction PFAS in firefighting foams ■■■■ echa.europa.eu>

Gesendet: Mittwoch, 26. Januar 2022 09:44

An: ■■■■ fetsa.eu; ■■■■ <■■■■ tanklagerverband.de>

Cc: ■■■■ <■■■■ ec.europa.eu>; ■■■■ <■■■■ echa.europa.eu>; ■■■■ <■■■■ echa.europa.eu>; ■■■■ <■■■■ echa.europa.eu>; ECHA Restriction PFAS in firefighting foams ■■■■ echa.europa.eu>

Betreff: RE: Letter from FETSA/LASTFIRE (fluorinated foam phase out)

Dear ■■■■ ■■■■

Thank you for the invitation to the working group meeting. Please accept my apologies for the late reply. We have had some organisational changes in the team working on this dossier.

■■■■ ■■■■ and myself are going to participate in the meeting.

Could you please let us know a type of questions we may expect from the participants. The dossier has not been published yet. Therefore, we are fine to answer any questions about the process and the timelines while any content related questions we may need to consider carefully taking in to account an equal treatment of all stakeholders.

Kind regards,

[REDACTED]
Unit ND3 – Risk Management I
European Chemicals Agency
P.O. Box 400, FI-00121 Helsinki, Finland
Tel. [REDACTED]
[REDACTED] [\[REDACTED\]@echa.europa.eu](mailto:[REDACTED]@echa.europa.eu)
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From: [REDACTED] [\[REDACTED\]@fetsa.eu](mailto:[REDACTED]@fetsa.eu)>
Sent: 26 January 2022 10:19
To: ECHA Restriction PFAS in firefighting foams [REDACTED] [\[REDACTED\]@echa.europa.eu](mailto:[REDACTED]@echa.europa.eu)>
Cc: [REDACTED] <[\[REDACTED\]@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>; [REDACTED] [\[REDACTED\]@echa.europa.eu](mailto:[REDACTED]@echa.europa.eu)>
Subject: Re: Letter from FETSA/LASTFIRE (fluorinated foam phase out)

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Dear Colleagues,

Unless I am mistaken, I did not yet receive any response to the speaking request below. Do you have any update?

Many thanks,

[REDACTED]



[REDACTED]
Executive Director

Rue Abbé Cuyper 3 | 1040 Brussels | Belgium

T [REDACTED] M [REDACTED]
rb@fetsa.eu | www.fetsa.eu

EU Transparency Register: ID number 60758835312-16

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On Fri, 14 Jan 2022 at 09:35, [REDACTED] [\[REDACTED\]@echa.europa.eu](mailto:[REDACTED]@echa.europa.eu)> wrote:

Dear [REDACTED]

Thank you for informing us about this workshop and the invitation to participate in it. Such events are very welcome to share experience among stakeholders, helping in a smooth transition to alternatives to PFAS-based foams, so thank you for organising it.

We submitted today the proposal for the restriction and it is planned to publish it on 23 February on ECHA's website. The preparation phase of this restriction proposal is now over and the opinion-making stage starts. A new team in ECHA has been designated to take over the work for this opinion-making phase, so I am no longer involved in this dossier. I will forward your email to the new team that will evaluate their participation in the workshop and will inform you about their decision. For future correspondence to ECHA on this topic, please use the functional mailbox in copy: [REDACTED]

[REDACTED]@echa.europa.eu

Best regards,

[REDACTED]

Scientific officer

European Chemicals Agency
PO Box 400 / Telakkakatu 6
00121 HELSINKI, Finland

Tel: [REDACTED]

Mob: [REDACTED]

[REDACTED]@echa.europa.eu

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



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From: [REDACTED] fetsa.eu>

Sent: 13 January 2022 11:21

To: [REDACTED]@echa.europa.eu; [REDACTED] <[REDACTED]@ec.europa.eu>

Cc: [REDACTED] <[REDACTED]@tanklagerverband.de>

Subject: Re: Letter from FETSA/LASTFIRE (fluorinated foam phase out)

Dear [REDACTED] Dear [REDACTED]

I hope you are both keeping safe. You will remember that FETSA represents the bulk liquid storage sector in Europe. Bulk liquid and liquified gas terminals are present in ports, airports, logistic platforms and along rivers, canals, and pipelines. In total FETSA represents over 140 companies operating approximately 700 terminals across Europe. In total, FETSA represents over 140 tank storage companies operating 692 terminals across Europe. FETSA have been working with LASTFIRE to understand their work on large scale testing of fluorine free foams given the hazardous nature of the products stored by FETSA members.

Our German member association, the UTV, is organising a working group covering the fluorinated foam phase out. The working group will take place on 11 February from 1500-1700. Participation is also online.

Participants will be foam producers, foam users (chemicals companies, tank terminals etc.), fire fighting experts like LastFire and the relevant trade associations in Germany (UTV, en2x, Bundesverband Technischer Brandschutz) as well as FETSA from the EU level.

This group is an informal working group to share best practices in the petroleum and chemical industries and learn about performance characteristics and suitability of different foam types for different applications. [REDACTED] [REDACTED] from UTV in CC is the chair of the next meeting and would be happy to answer any questions you might have.

Would you or a colleague be able to attend this working group in order to give an update on your latest findings, timings etc. following on from last summer's public consultation?

Many thanks,

[REDACTED] [REDACTED]



[REDACTED] [REDACTED]

Executive Director

Rue Abbé Cuypers 3 | 1040 Brussels | Belgium

T [REDACTED] M [REDACTED]

rb@fetsa.eu | www.fetsa.eu

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On Mon, 6 Sept 2021 at 13:09, [REDACTED] <[REDACTED]@echa.europa.eu> wrote:

Dear [REDACTED]

Thank you for this piece of information. We will take it into account during the preparation of ECHA's proposal for a restriction of PFAS substances in firefighting foams. However, please note that this is independent from the ongoing PFHxA restriction process (which includes firefighting foams among other uses).

Therefore, the information submitted to me will not be taken into account for the PFHxA restriction. In case you wish to submit a similar contribution to the PFHxA restriction opinion development, you still have the opportunity to comment the SEAC draft opinion by **7 September** (i.e. tomorrow) via the following link: <https://echa.europa.eu/restrictions-under-consideration/-/substance-rev/51401/term> (see "Draft opinion of SEAC" and "Consultation on SEAC draft opinion : give comments").

Best regards,

[REDACTED]
Scientific officer

European Chemicals Agency
PO Box 400 / Telakkakatu 6
00121 HELSINKI, Finland

Tel: [REDACTED]

Mob: [REDACTED]

[REDACTED] echa.europa.eu

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



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From: [REDACTED] fetsa.eu>

Sent: 06 September 2021 13:35

To: [REDACTED] echa.europa.eu>; [REDACTED] <[REDACTED]@echa.europa.eu>

Cc: [REDACTED] <[REDACTED]@enrgconsultants.co.uk>

Subject: Letter from FETSA/LASTFIRE (fluorinated foam phase out)

Dear [REDACTED] Dear [REDACTED]

Please find attached a letter from FETSA (Federation of European Tank Storage Associations) and LASTFIRE related to the phase out of fluorinated foams.

We remain at your disposal to answer any questions that you may have.

Best wishes,

[REDACTED]



[REDACTED]

Executive Director

Rue Abbé Cuypers 3 | 1040 Brussels | Belgium

T [REDACTED] M [REDACTED]

rb@fetsa.eu | www.fetsa.eu

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