

[REDACTED]
Director of Risk Management
Telakkakatu 6
00121 Helsinki
Finland

20 May 2024

Re: Proposing a smoother process for stakeholder contribution to the U-PFAS restriction proposal

Cc: [REDACTED] Team Leader in Restrictions Opinion Making
[REDACTED] Chair of the Risk Assessment Committee
[REDACTED] Chair of the Socio-Economic Analysis Committee

Dear [REDACTED] Dear [REDACTED]

We welcome the extraordinary efforts being put forward by ECHA towards the delivery of the opinion on the Universal PFAS restriction. We would like to contribute to those efforts proposing some measures to improve the stakeholders' contribution in all the steps of ECHA's opinion making process.

This restriction is a complex proposal that is triggering challenging situations for all of us. Experts attending the Committees' discussions and other stakeholders with an interest in the restriction have told us about the hurdles they are facing to try to follow and contribute to the process.

We believe that stakeholders' participation will help to ensure a robust and sound ECHA opinion. Therefore, we kindly ask you to consider the challenges reported, as well as some proposed measures to address them. We would like to propose the following suggestions for your consideration:

- **Distribution of Committees' documents.** The assessment of the documents to be discussed by the Committees by accompanying experts is proving to be challenging. Sometimes extensive documents, such as the draft opinions of the Committees, are available one day before the meeting. Experts have reported that they are unable to assess the papers and hence properly contribute to the Committees' meetings.

Please consider uploading Committee's documents to be assessed by the accredited stakeholders (regular and occasional) at least one week before the Committees' meeting, in particular the draft opinions and the revised versions of the Background Document.

- **Minutes of the Committee meetings.** Visibility of the main discussions and outcomes is essential to allow stakeholders to better understand and participate into the process and provide expertise on this complex file. Concrete updates about the proceedings communicated during meetings should be made available to all interested stakeholders. This would ensure equal access to information, even for those stakeholders that are not invited to specific meetings.

Please consider the possibility of drafting more detailed minutes describing key concepts and decisions proposed by the Committees (

- **Access to the Background Document (BD).** The BD is revised to incorporate new data including the information gathered during the consultation launched on the Restriction proposal. An early access to the BD revised versions will enable stakeholders to understand the development of the assessment of the uses, the remaining data gaps and to optimally prepare for the SEAC draft opinion consultation.
- Please consider the preliminary publication of revised versions of the BD, **Access to the Responses to the Comments to the Consultation (RCOM).** The dossier submitters and the rapporteurs will address the comments submitted by the stakeholders in the consultation launched on the restriction in the RCOM. We assume that the contributions dealing with the specific uses discussed in the plenary meetings are prioritised in such assessment. Publishing the RCOM on the specific uses before they are discussed in the Committees' meetings will allow interested parties to better contribute to the Committees' discussions and will help them to prepare in advance their contribution to the SEAC draft opinion consultation.

Please consider publishing the RCOM specific to the uses to be discussed in the plenary in advance of the Committee discussions.

- **Information on Alternatives.** Different documents of the restriction proposal include information on alternatives, such as the restriction report, annexes, and the revised versions of the BD. However, there is no clarity on the criteria used to assess the acceptability of the alternatives for the different uses by the Committees. A detailed explanation of the elements considered when assessing alternatives will allow the stakeholders to provide useful data and understand the proposals made on the different uses.

Please consider providing information on the criteria used to assess alternatives.

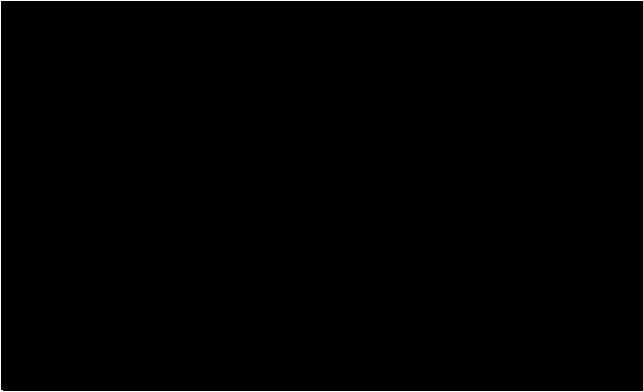
- **Regular public updates.** Access to updated information is going to be crucial to allow interested parties to continue contributing to the process. We very much appreciate the current initiatives taken by ECHA on this regard, such as the podcast episodes. Other channels or forms of updates could be considered to ensure the widest access possible to the information.

Please consider providing additional updates on the Restriction proposal including info sessions with Q&A or a standing column on PFAS in the ECHA newsletter.

- **Onboarding sessions for new stakeholders.** The PFAS proposed restriction has attracted a significant number of new stakeholders. They may not be familiar with the practicalities entailed in the role, such as access to the updated documents through the relevant tools (Circa / Interact), or even the nature of the documents that are shared.

Please consider practical onboarding session for the newcomers.

My team and I remain available to further discuss these suggestions with the Agency and we thank you for your kind consideration.



FPP4EU

