

[REDACTED]

From: [REDACTED]
Sent: 21 September 2021 18:42
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: TR: ECHA Survey on PFAS in Fire-Fighting Foams / Call with ECHA

Follow Up Flag: Follow up
Flag Status: Completed

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Check the email address of the sender. It is possible that the name of the sender is known to you (e.g. a colleague), but the actual sender is someone else.

[REDACTED],

Thank you very much for this interesting exchange of the 10th September about firefighting foams.

[REDACTED] works hard to find a solution to make the transition to PFAS-free foams. The protection of the environment is one of our priority but we have to take into account the security of our pilots, firefighters and planes.

We are planning other tests of PFAS-free foams. [REDACTED] foams samples including [REDACTED] foams have be ordered by our specialists. We hope to find one which will be efficient.

I just wanted to add to our discussion that we are truly committed to limit our reject of PFAS in the nature. Indeed, foams are just used in real firefighting operations and to test our material. We don't use PFAS foams for our training and specific course. We just use water during our exercise.

For your information, we are in the process of establishing a PFAS sub-working group to the EDA REACH Task Force in order to foster discussions/exchange of information between EDA participating Member States (+Norway). [REDACTED] is the pilot of this group and we hope to find together solutions.

Don't hesitate to contact us if you need more information.

Best regards.

[REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Tuesday, 7 September 2021 17:22
To: [REDACTED] <[\[REDACTED\]@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)>
Cc: [REDACTED] <[\[REDACTED\]@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)>; [REDACTED]
Subject: RE: ECHA Survey on PFAS in Fire-Fighting Foams / Call with ECHA

Dear [REDACTED],

I propose you to make the call Friday 10th September from 11:00 to 12:00.

[REDACTED] and [REDACTED] will participate and I would like to add the specialist of our air force. I am not sure that this specialist speaks English. Do you think it could possible to make the call [REDACTED]?

Best regards.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

De : [REDACTED] <[\[REDACTED\]@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)>
Envoyé : mardi 7 septembre 2021 16:45
À : [REDACTED]
Cc : [REDACTED] <[\[REDACTED\]@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)>
Objet : RE: ECHA Survey on PFAS in Fire-Fighting Foams / Call with ECHA

[REDACTED],

Please find below a copy of [REDACTED] responses to questions received from [REDACTED]/ECHA.

Looking forward to your feedback on the time slot that would suit best for a meeting with ECHA.
I will then send an outlook invitation and schedule a WebEx meeting.

Best regards,

[REDACTED]

[REDACTED]
Project Officer REACH



FOLLOW US ON

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 www.eda.europa.eu

From: [REDACTED]
Sent: Tuesday, 7 September 2021 09:38
To: [REDACTED]@eda.europa.eu>; [REDACTED]
[REDACTED]@eda.europa.eu>
Subject: FW: Please Review: PFAS firefighting foams in defense: follow-up question

Dear [REDACTED] and [REDACTED],

Please find below a copy of my response to questions received from [REDACTED] at ECHA.

Kind Regards,
[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: Tuesday, September 7, 2021 9:36 AM
To: [REDACTED]@echa.europa.eu>
Subject: FW: Please Review: PFAS firefighting foams in defense: follow-up question

Dear [REDACTED],

Thank you for giving us the opportunity to comment. In order to clearly separate Section 322 from sections 323/324 we recommend the following:

The Fiscal Year 2020 National Defense Authorization Act (NDAA) enacted the phase out of the US Department of Defense's use of PFAS-containing firefighting foam by October 2024 (with an exception for shipboard use). However, the Secretary of Defense may waive the prohibition for one year (renewable once for another year until 2026) if duly justified, such as the protection of life and safety or because no agent or equipment solutions are available that meet the military specifications. The NDAA also immediately prohibits the uncontrolled release of aqueous film-forming foam (AFFF) in testing and training, but allows emergency use or non-emergency use if completely contained. (+ hyperlink to the official text).

As for your 2nd question, we are aware of some general responses from EU MoDs. However, we are unable to comment on the internal deliberations of other MoDs. For DoD, further extensions will only be possible if authorized by Congress. Though, while Congress may modify the law, it is premature for DoD to comment on how long it will take to develop PFAS-free drop-in replacements that are qualified under the military specification, ensure

that there is an adequate commercial supply for all of DoD, contract for and schedule the change-out of the PFAS-free solution over all of DoD's facilities and equipment, and contract for the proper disposal of AFFF. When viewed from an international perspective, with multiple entities attempting to do the same change-out in similar time periods, this could lengthen the implementation period. While the NDAA currently has an October 2026 deadline, if the two 1-year extensions are submitted with the required justification, it will build the record for Congress to consider whether additional extensions are justified.

I hope this helps.

Please let me know if you have any questions.

Respectfully,

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@echa.europa.eu>
Sent: Thursday, August 19, 2021 5:11 PM
To: [REDACTED]
Subject: PFAS firefighting foams in defense: follow-up question

Dear [REDACTED],

I hope you had a relaxing summer break and sunnier than what I experienced a couple of weeks ago in Belgium...

As you know, we are preparing our restriction proposal on firefighting foams which we will submit on 1st October. I'd like to shortly summarise there the provisions US Fiscal Year 2020 NDAA and would like to check with you the accuracy of the following wording:

The Fiscal Year 2020 National Defense Authorization Act (NDAA) enacted the phase out of the US Department of Defense's use of PFAS-containing firefighting foam by October 2024 (with an exception for shipboard use) and immediately prohibits the uncontrolled release of fluorinated aqueous film-forming foam (AFFF) and the use of AFFF in training exercises at military installations. However, the Secretary of Defense may waive the Act provisions for one year (renewable once for another year) if duly justified, such as the protection of life and safety or because no agent or equipment solutions are available that meet the military specifications. (+ hyperlink to the official text).

At the same time, you probably have been made aware that I contacted in spring the EU MoD via the European Defence Agency to gain further insight on their use of firefighting foams and the transition to fluorine-free alternatives. Several of them came back with requests for being granted a 6 to 12 years transitional period or even to be exempted from the restriction on the grounds that fluorine-free foams have not been proved effective enough yet for the fire scenarios they can encounter.

Such long periods strike me when I compare with the US targets in the 2020 NDAA which are much more ambitious. I understand that the Secretary of Defense can delay the ban for a maximum of two years, which would mean October 2026, but this is still below the 10-12 years that several EU MoDs are calling for. Therefore, I am still wondering why it would be so slow to transition in the EU compared to the US (also assuming some transatlantic cooperation on this issue). Also, was wondering if further extensions of the 2-years waiver are legally possible in the US in case it appears that the alternatives are not satisfactory enough. If you have any further information on these issue I would be happy to read it!

Best regards,

[REDACTED]
Scientific officer
European Chemicals Agency
PO Box 400 / Telakkakatu 6
00121 HELSINKI, Finland
Tel: +358 9 6861 [REDACTED]
Mob: +358 504 169 [REDACTED]

From: [REDACTED]
Sent: Thursday, 2 September 2021 16:18
To: [REDACTED]
Cc: [REDACTED]
[REDACTED] <[\[REDACTED\]@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)>
Subject: RE: ECHA Survey on PFAS in Fire-Fighting Foams / Call with ECHA

Dear [REDACTED],

This is a kind reminder for your response on my below email, and to inform you that related meeting between ECHA and the [REDACTED] has been scheduled on Wednesday 8 September from 13.30 to 15.00. Therefore, I have updated the list of suitable dates accordingly:

- Monday 6 Sept: whole day
- Tuesday 7 Sept: fine between 13:30 and 16:30 [REDACTED]
- Wednesday 8 Sept: morning
- Thursday 9 Sept: fine until 16:30 [REDACTED]
- Friday 10 Sept: whole day

Looking forward to your reply.

Best regards,

[REDACTED]
Project Officer REACH



FOLLOW US ON    

 [REDACTED] <[\[REDACTED\]@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)>
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From: [REDACTED]
Sent: Tuesday, 24 August 2021 15:15
To: [REDACTED]
Cc: [REDACTED]

[REDACTED]
[REDACTED]@eda.europa.eu>

Subject: ECHA Survey on PFAS in Fire-Fighting Foams / Call with ECHA

Dear [REDACTED],

Following my below email, I came back to you to support [REDACTED]/ECHA who would like to have a call with the [REDACTED] to discuss further your rationale for a longer transitional period for the use of PFAS in firefighting foams.

The following dates are suitable for both [REDACTED] and I:

- Thursday 2 Sept: fine until 16:30 [REDACTED]
- Friday 3 Sept: fine until 13:00 [REDACTED]
- Monday 6 Sept: whole day
- Tuesday 7 Sept: fine between 13:30 and 16:30 [REDACTED]
- Wednesday 8 Sept: whole day
- Thursday 9 Sept: fine until 16:30 [REDACTED]
- Friday 10 Sept: whole day

According to [REDACTED], 1h to 1,5h is more than enough.

May I kindly ask you to let me know **as soon as possible** which time slot would suit you best?
I will then send an outlook invitation and schedule a WebEx meeting.

FYI, we are also organising a dedicated meeting between ECHA and the [REDACTED]. Please find attached additional inputs the [REDACTED] shared with ECHA on the 4 August.

Thank you. Best regards,

[REDACTED]
Project Officer REACH



FOLLOW US ON

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From: [REDACTED]

Sent: Tuesday, 3 August 2021 15:06

To: [REDACTED]@eda.europa.eu>

Cc: [REDACTED]

Subject: RE: ECHA additional question following EDA pMS Responses and EDA General Feedback to ECHA Survey on PFAS in Fire-Fighting Foams

Dear [REDACTED],

Thank you for this information. I will be in holidays from the 9th august to the end of august but be available after to answer questions.

Best regards

[REDACTED]

[REDACTED]

[REDACTED]

De : [REDACTED] <[\[REDACTED\]@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)>

Envoyé : mardi 3 août 2021 14:56

À : [REDACTED]

Cc : [REDACTED]

Objet : RE: ECHA additional question following EDA pMS Responses and EDA General Feedback to ECHA Survey on PFAS in Fire-Fighting Foams

Dear [REDACTED],

This is to inform you that [REDACTED]/ECHA informed us that he might come back to [REDACTED] later to check which pieces of information he can use in the public version of the restriction proposal.

Best regards,

[REDACTED]

[REDACTED]

Project Officer REACH



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www.eda.europa.eu

From: [REDACTED]

Sent: Thursday, 22 July 2021 16:50

To: [REDACTED] <[\[REDACTED\]@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)>

Cc: [REDACTED]

Subject: RE: ECHA additional question following EDA pMS Responses and EDA General Feedback to ECHA Survey on PFAS in Fire-Fighting Foams

Dear [REDACTED],

In the absence of [REDACTED], please find below the answer of the [REDACTED] to the questions of ECHA about the restriction proposal on PFAS in firefighting foams.

Question 1 de l'ECHA : Why the defence sector would not be able to transition in an average transition period (e.g. 5 years)? It is understood from other stakeholders that it is essentially the fire of very large fuel tanks, tank farms and chemical industries dealing with different types of flammable liquids (polar and non-polar) which are challenging to deal with current fluorine-free foams. However, from the information submitted so far by the MoDs it is still not clear why the defence sector would face similar issues whereas the civil aviation sector for example is largely phasing out PFAS foams. In defence, there can be ammunitions, flammable liquids and people in proximity but aren't F-free foams able to extinguish quickly these types of fire? **So far, we are not convinced that the defence sector would need a transitional period longer than e.g. civil aviation.** Therefore, we would call for more solid justifications about this, also considering that the US DoD will transition very soon to F-free foams (except for Navy) and that other EEA military forces have already substituted PFAS foams.

[REDACTED] **claims that the defence sector needs a longer transition period than the civil aviation sector, estimated today at 8 years (10 years from now).**

The defence sector needs very powerful firefighting foams due to additional issues compared to the civilian aviation sector:

- First, in terms of additional risks for firefighters concerning military aircrafts: in most of the aircrafts, there are ammunitions, which require specific safety measures and the use of specific equipment, different from the civilian sector. In addition, the [REDACTED] operate within the framework of nuclear deterrence. The presence of nuclear weapon in some aircrafts requires the [REDACTED] to be able to react as rapidly as possible to avoid that a fire trigger this weapon and cause a nuclear accident.

- Second, military firefighters can operate under the fire of the enemy. In other words, they have to spread the foams and leave the place as soon as possible in order to not be killed in action. If the foams lack of efficiency, the fire will resume and firefighters will be exposed to security and safety risks a second time.

- Finally, unlike the civilian sector and other European armed forces, the conditions of operation of the [REDACTED] can be very specific and currently require the need of PFAS foams: [REDACTED] act mainly where weather conditions are extreme (intense heat, wind,...). The temperature are mainly very hot which decreases the efficiency of firefighting foams.

For the above-mentioned reasons, [REDACTED] must provide its firefighters with firefighting-foams ensuring an extinguishing time as short as possible to protect the military aircrafts, to protect them in all conditions and to support operations.

Aware of the importance of the protection of the environment, [REDACTED] have started to carry out tests capacities in order to find an appropriate foam:

- In 2020, 4 different foams were tested, however none of them were fully compliant to the required characteristics. It was decided to undertake new tests.

- In 2021, 10 new samples of foams will be tested, one of them being the foam used by Norway firemen. Expectations are high for these tests and [REDACTED] will share its conclusions on the results, however at this stage it is not known whether the experiment will be conclusive.

The above-mentioned reasons may still be relevant in the future, if no alternative is found. Therefore, [REDACTED] asks for the derogation to allow for a longer transition period for defence uses and its possible renewal, if needed for the interests of defence.

Question 2 de l'ECHA: In the event that a longer transitional period would be granted to the defence sector, the problem of possibly significant emissions of PFAS in the environment would remain during this long timeframe.

Indeed, unlike the Seveso sites which already have risk management measures in place (bundled areas, waterproof ground, collection basins, etc.) to capture firewaters in case of an accident, the defence sector would be unable to implement such strict risk management measures for the entirety of their sites (e.g. training battlefield). This is highly problematic since PFAS are PBT substances for which a minimization approach should be taken. Therefore, information on possible improvement of risk management measures for all types of sites (i.e. not only the firefighting foam training site or the fuel storage area but all sites/terrains used by the military forces) aiming at minimizing releases in the environment would be required to support a longer transitional period.

Answer [REDACTED]:

To limit the emissions of PFAS in the environment, [REDACTED] are committed to:

- During the training, decrease the volume of foams used to test all the materials. [REDACTED] only train on secure areas where it is possible to recover the contaminated waters (spillage containers). Then, we retreat all these waters to eliminate the PFAS.
- In real conditions, [REDACTED] are not able to recover water on specific devices. Using foams is not usual in operations, thus the development of protocols for the decontamination and remediation of the soil is still under way. Based on the work and expertise for the remediation of soils contaminated with oil spills, specialized teams could also be sent on the ground for PFAS remediation operations.

Is it necessary that we make a comparison with the transition made by the [REDACTED]?

Please let us know if further details are needed. We remain available, with [REDACTED], to answer any questions.

Best regards,

[REDACTED]

[REDACTED]

[REDACTED]

De : [REDACTED] <[\[REDACTED\]@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)>

Envoyé : lundi 28 juin 2021 17:38

À : [REDACTED]

Cc :

Objet : ECHA additional question following EDA pMS Responses and EDA General Feedback to ECHA Survey on PFAS in Fire-Fighting Foams

Dear colleagues,

Following up EDA and pMS participation to ECHA's survey on PFAS in Fire-Fighting Foams (ECHA questionnaire is attached again for your convenience and EDA/pMS responses have been placed on ECP [here](#)) conducted in the context of related ECHA's restriction proposal under REACH, we have received the email below from ECHA requesting further information on two issues that were included in the survey but which they consider have not yet been fully answered and are really important to substantiate the claim for a longer review period.

- The compliance with current standards being put aside (as they will evolve as well with the new foam products), why the defence sector would not be able to transition in an average transition period (e.g. 5 years)? It is understood from other stakeholders that it is essentially the fire of very large fuel tanks, tank farms and chemical industries dealing with different types of flammable liquids (polar and non-polar) which are challenging to deal with current fluorine-free foams. However, from the information submitted so far by the MoDs it is still not clear why the defence sector would face similar issues whereas the civil aviation sector for example is largely phasing out PFAS foams. In defence, there can be ammunitions, flammable liquids and people in proximity but aren't F-free foams able to extinguish quickly these types of fire? So far, we are not convinced that the defence sector would need a transitional period longer than e.g. civil aviation. Therefore, we would call for more solid justifications about this, also considering that the [REDACTED] will transition very soon to F-free foams (except for Navy) and that other EEA military forces have already substituted PFAS foams.
- In the event that a longer transitional period would be granted to the defence sector, the problem of possibly significant emissions of PFAS in the environment would remain during this long timeframe. Indeed, unlike the Seveso sites which already have risk management measures in place (bundled areas, waterproof ground, collection basins, etc.) to capture firewaters in case of an accident, the defence sector would be unable to implement such strict risk management measures for the entirety of their sites (e.g. training battlefield). This is highly problematic since PFAS are PBT substances for which a minimisation approach should be taken. Therefore, information on possible improvement of risk management measures for all types of sites (i.e. not only the firefighting foam training site or the fuel storage area but all sites/terrains used by the military forces) aiming at minimising releases in the environment would be required to support a longer transitional period.

In addition to these two questions, ECHA is also seeking for specific information from the [REDACTED] on how they could already substitute PFAS foams with alternatives whereas other MoDs claim that these F-free foams do not perform sufficiently well and that long transitional period (up to 12 years) might be needed. We would be interested to know for which types of uses [REDACTED] could substitute PFAS foams and if these uses are any different from the uses of the armed forces from the other countries.

From this message, we understand that ECHA is not convinced that a longer transition period (in comparison to an average transition period of 5 years as foreseen for civil aviation) is needed for the defence sector.

Therefore, **we/EDA encourage all pMS that need for a longer transition period towards fluorine-free foams to provide us with their responses (even partially completed) by CoB 23 July 2021 in order to forward them to ECHA as soon as they are received**, or directly to the following ECHA's submission page by early August 2021. For those pMS who have already provided their response in June 2021, you can also update your response and circulate the updated version of the questionnaire, providing your additional information in a new colour.

We will keep you informed of any further developments.

Thank you very much for your time and cooperation.

Best regards,

[REDACTED]

[REDACTED]
Project Officer REACH



FOLLOW US ON    

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From: [REDACTED]@echa.europa.eu>

Sent: Friday, 18 June 2021 18:03

To: [REDACTED]@eda.europa.eu>

Cc: [REDACTED]@eda.europa.eu>

Subject: RE: EDA pMS Responses and EDA General Feedback to ECHA Survey on PFAS in Fire-Fighting Foams - June 2021

Dear [REDACTED],

Thank you very much for this. During your meeting next week, if you have the opportunity to thank on my behalf the MoDs having responded to our survey that would be nice!

I do not want to abuse EDA and MoDs with our requests but in case they are still willing to contribute there are two issues which were included in the survey but which have not fully been answered yet and which are really important to substantiate the claim for a longer review period:

- The compliance with current standards being put aside (as they will evolve as well with the new foam products), why the defence sector would not be able to transition in an average transition

period (e.g. 5 years)? It is understood from other stakeholders that it is essentially the fire of very large fuel tanks, tank farms and chemical industries dealing with different types of flammable liquids (polar and non-polar) which are challenging to deal with current fluorine-free foams. However, from the information submitted so far by the MoDs it is still not clear why the defence sector would face similar issues whereas the civil aviation sector for example is largely phasing out PFAS foams. In defence, there can be ammunitions, flammable liquids and people in proximity but aren't F-free foams able to extinguish quickly these types of fire? So far, we are not convinced that the defence sector would need a transitional period longer than e.g. civil aviation. Therefore, we would call for more solid justifications about this, also considering that [REDACTED] will transition very soon to F-free foams (except for Navy) and that other EEA military forces have already substituted PFAS foams.

- In the event that a longer transitional period would be granted to the defence sector, the problem of possibly significant emissions of PFAS in the environment would remain during this long timeframe. Indeed, unlike the Seveso sites which already have risk management measures in place (bunded areas, waterproof ground, collection basins, etc.) to capture firewaters in case of an accident, the defence sector would be unable to implement such strict risk management measures for the entirety of their sites (e.g. training battlefield). This is highly problematic since PFAS are PBT substances for which a minimisation approach should be taken. Therefore, information on possible improvement of risk management measures for all types of sites (i.e. not only the firefighting foam training site or the fuel storage area but all sites/terrains used by the military forces) aiming at minimising releases in the environment would be required to support a longer transitional period.

I take this occasion to ask you if it would be possible for you to ask [REDACTED] how they could already substitute PFAS foams with alternatives whereas other MoDs claim that these F-free foams do not perform sufficiently well and that long transitional period (up to 12 years) might be needed. We would be interested to know for which types of uses [REDACTED] could substitute PFAS foams and if these uses are any different from the uses of the armed forces from the other countries.

I will start my summer break now but will be back end of July. If they could send their reply by early August that would be nice. Any information on the above could be submitted via you or directly to the following [ECHA's submission page](#).

Thank you!

Best regards,

[REDACTED]
Scientific officer
Risk Management Unit II
European Chemicals Agency
PO Box 400 / Telakkakatu 6
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Mob: +358 504 169 [REDACTED]
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<http://echa.europa.eu/>



The above represents the opinion of the author and is not an official position of the European Chemicals Agency. This email, including any files attached to it, is intended for the use of the individual to whom it is addressed. If you have received this message in error, please notify the author as soon as possible and delete the message.

From: [REDACTED]
Sent: Monday, 7 June 2021 17:24

Subject: RE: EDA pMS Responses and EDA General Feedback to ECHA Survey on PFAS in Fire-Fighting Foams - June 2021

Dear colleagues,

We are pleased to share with you the attached positive feedback from ECHA, which thanks us/EDA and participating Member States for our contribution.

We will keep informed on any further developments.

Best regards,

[REDACTED]

[REDACTED]
Project Officer REACH



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From: [REDACTED]
Sent: Friday, 4 June 2021 19:27
Subject: EDA pMS Responses and EDA General Feedback to ECHA Survey on PFAS in Fire-Fighting Foams - June 2021

Dear colleagues,

We/EDA are pleased to inform you that we have just shared with ECHA (copy EC/DG GROW and DG ENV) the attached **EDA pMS' Responses and EDA's General Feedback to ECHA's Survey on PFAS in Fire-Fighting Foams** in the context of related ECHA's restriction proposal under REACH.

We want to take this opportunity to thank all pMS that shared their responses/questionnaires despite the short timelines, as well as [REDACTED] for her support in the preparation of the EDA's general feedback.

We informed ECHA that the list of EDA pMS' responses provided include those MoDs' responses to the ECHA questionnaire that were provided, or were copied to EDA, by the deadline specified by ECHA (4 June 2021). We highlighted that the questionnaires reflect the information that MoDs could gather in the limited time available between the receipt of the questionnaire (6 May 2021) and the deadline for response (4 June 2021), therefore some questionnaires may be partially filled.

Potential additional or complemented MoD questionnaire responses, that may be provided to EDA after the 4 June 2021 deadline, will be forwarded by EDA to ECHA upon receipt, for potential consideration, even if the deadline may have passed. Therefore, **we encourage all pMS that have not done so already to provide us with their responses (even partially completed) in order to forward them to ECHA as soon as they are received.**

We will keep informed of any further developments.

Thank you very much for your time and cooperation.

Best regards,

[REDACTED]

[REDACTED]

Project Officer REACH



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From [REDACTED]

Sent: Friday, 7 May 2021 11:22

Cc: [REDACTED] [@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu); [REDACTED] [@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)

Subject: ECHA's Stakeholders survey on PFAS in firefighting foams - pMS consultation by 1 June 2021

Dear Colleagues,

We hope this finds you well and keeping safe.

Please find attached (and below related ECHA email) the **ECHA's Stakeholders survey on PFAS in firefighting foams*** we received yesterday from ECHA.

ECHA informed pMS of this short consultation (1 month) at the last (13th) EDA REACH Plenary Meeting – Session with Industry on 21 April 2021 (*the Draft Operational Conclusions are currently under review by all participants*).

As highlighted by ECHA, “It is important for stakeholders to respond to it because it can help us [ECHA] determine which regulatory risk management measure would be most appropriate and **identify sector-specific constraints in relation with transitional periods** [REACH restrictions can contain transitional periods for compliance / to transition from PFAS-based to fluorine-free firefighting foams]”.

As agreed with ECHA and pMS participants to the 13th EDA REACH Plenary Meeting, **we/EDA will gather and provide the pMS MoDs' responses** by the 4 June 2021 to ECHA *via* our direct channel of communication ([REDACTED]/ECHA).

Therefore, we kindly ask you to fill in the Word questionnaire in attachment and send it to us/EDA REACH PoCs

[REDACTED] [@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)) and [REDACTED] [@eda.europa.eu](mailto:[REDACTED]@eda.europa.eu)) **NLT Tuesday 1 June 2021.**

Please try to answer the questions to the extend you can, but it is important that you do **not** limit yourselves to these questions. This consultation is a **key opportunity to address all PFAS in firefighting foams-related issues that are of concerned for you/defence sector**, so please do not hesitate to expand and include other information that could lead **to extend the transitional period** proposed by ECHA to the Commission for uses of firefighting foams for military applications. To remind you, the Commission currently foresee a transition period of 3 to 6 years to transition from PFAS-based to fluorine-free firefighting foams for military applications, while several pMS' experts

underlined the need for a longer transition period (refer to the Operational Conclusions of the PFAS Dedicated Session during 29th EDA REACH Task Force meeting on 3 February 2021).

In the meantime, on the basis of our previous exchanges, we/EDA will address further general messages to pass to ECHA on importance for MoDs to have a consistent/sufficient transitional period with regard to military uses of firefighting foams, and will keep you informed of related developments.

For your information, ECHA prepared an online version of the survey (<https://link.webpolsurveys.com/Participation/Public/1736e7cb-d0ef-40ae-af02-64a3da4109dc?displayId=Fin2275415>) to allow them an easier processing of the collected data (**only for non-confidential information**). We will share this information / link to the survey with ASD REACH & Chemicals Management Working Group, but as mentioned by ECHA, this survey can be forwarded to other relevant stakeholders we might identify. Therefore, you are encouraged to share it, especially with your NDIAs.

Do not hesitate to come back to us would you have any questions regarding the survey/consultation.

Thank you very much for your time and cooperation, and looking forward to your reply

Best regards,

[Redacted]

** All background information on EDA Activities on PFAS are detailed in the Communication EDA202103033 concerning the "Outcome of the PFAS Dedicated Session during 29th EDA REACH Task Force meeting, 3 February 2021" – Proposed way ahead to address implications from PFAS-related ongoing EU regulatory risk management activities circulated on 5 March 2021.*

[Redacted]

Project Officer REACH



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From: [Redacted] [@echa.europa.eu](mailto:[Redacted]@echa.europa.eu)

Sent: Thursday, 6 May 2021 16:06

To: [Redacted] [@eda.europa.eu](mailto:[Redacted]@eda.europa.eu); [Redacted]

[Redacted] [@eda.europa.eu](mailto:[Redacted]@eda.europa.eu)

Cc: ECHA Restriction PFAS in firefighting foams <[Redacted]@echa.europa.eu>;

[Redacted] [@ext.echa.europa.eu](mailto:[Redacted]@ext.echa.europa.eu)

Subject: Stakeholders survey on firefighting foams

Dear [Redacted] and [Redacted],

As discussed earlier I share with you the stakeholders survey on the use of firefighting foams. It is important for stakeholders to respond to it because it can help us determine which regulatory risk management measure would be most appropriate and identify sector-specific constraints in relation with transitional periods.

We prepared an [online version](#) of the survey to allow us an easier processing of the collected data, however, only non-confidential information can be submitted via this channel. If stakeholders wish to share confidential information they need to fill in the Word questionnaire in attachment and send it to the following [ECHA's submission page](#).

We ask stakeholders to respond by 4 June 2021.

We thank you very much for accepting to forward this survey request to the MoDs. I attach the Word version to this email for your convenience. My colleague [REDACTED] in copy will take care of the follow-up of the survey.

Do not hesitate to come back to us if you have any question,

Best regards,

[REDACTED]

[REDACTED]
Scientific officer
Risk Management Unit II
European Chemicals Agency
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