

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Public Safety concerns of Fluorine Free Foams and Submission on Amending Annex IV of EU Regulation 2019/1021 on POP waste - specifically PFOA
Date: 12 November 2021 15:35:00

Alright, thank you [REDACTED]

Have a good week-end,

Best regards,

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: 12 November 2021 15:21
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED]
<[REDACTED]>
Subject: RE: Public Safety concerns of Fluorine Free Foams and Submission on Amending Annex IV of EU Regulation 2019/1021 on POP waste - specifically PFOA

Hi [REDACTED]

This concerns the amendment of Annex IV of the POPs Regulation, containing the limits for POPs in waste to allow their treatment. [REDACTED] is following this and I do not think it is relevant for our PFAS fire-fighting foams restriction. I copy [REDACTED] so that he's informed.
[REDACTED] [REDACTED] is a consultant working for the fluorinated foams industry, who is very vocal about the non-suitability of fluorine-free foams.

Kind regards

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Friday, November 12, 2021 9:28 AM
To: [REDACTED] (ENV) <[REDACTED]>
Cc: [REDACTED] (ECHA) <[REDACTED]>
Subject: FW: Public Safety concerns of Fluorine Free Foams and Submission on Amending Annex IV of EU Regulation 2019/1021 on POP waste - specifically PFOA

Dear [REDACTED]

Please see here FYI. The main submission seems to relate to an ongoing (?) consultation under the EU POP on PFOAS impurities in waste. I'm not aware of this, do you know what he is referring to?

Note that at present, our ECHA restriction proposal envisages to set the impurity threshold in foam concentrates and in waste to be treated at 1000 ppb.

Best regards,

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: 12 November 2021 04:21
To: ECHA Restriction PFAS in firefighting foams <restriction-PFAS-FirefightingFoams@echa.europa.eu>

Cc: [REDACTED] <[REDACTED]>
<[REDACTED]>
Subject: Public Safety concerns of Fluorine Free Foams and Submission on Amending Annex IV of EU Regulation 2019/1021 on POP waste - specifically PFOA

Dear [REDACTED]

This is to confirm my submission to this EU 'Have your say' opportunity for comment on the preferred proposed Annex IV limits for PFOA as a POP during waste management and transportation for safe disposal. It also contains important Public Safety concerns.

Please read the full submission PDF attached, since it includes very recent (4th Oct.2021) Public Safety Concerns published by US Federal Aviation Administration, and supporting disturbing evidence, which is highly relevant to the SEAC Committee determining its final opinion on PFHxA restrictions. It also confirms from latest US Centre for Disease Control 2017-18 data set of general population blood serum that PFHxA was not detected in any age or demographic groups tested. It also showed PFOA levels declining significantly. A similar 2021 blood serum study of US firefighters (referenced within) also showed PFHxA was not detected.

The Federation of German Industries (BDI) also rejected recent proposals to treat PFAS as a single group since its characteristics are too diverse ranging from solids through liquids into gases, including substances of concern and already restricted, while others show no harm to human health, are not bioaccumulative, nor toxic and are widely considered virtually non-hazardous, deserving of continued use for life saving purposes like firefighting in major flammable liquid fires.

Please read these very recent findings to better inform yourselves and SEAC, so ECA does not subsequently regret its final SEAC opinion on PFHxA. This decision should not be disproportionate, and seems deserving of a relaxation to proposed restrictions, since Fluorine Free Foam alternatives (F3s) are clearly proven not to offer equivalent, or near equivalent fire performance to C6 alternatives. Nor do F3s confer adequate life safety protections for those occupationally exposed to fires, nor emergency responders, nor nearby communities.

Society's expectations of public safety are being compromised if ONLY F3s are permitted for use, without continued use of C6 foams for major potentially catastrophic fires involving flammable liquids (ie at Major Hazard Facilities including airports, military, oil and chemical processing, storage and bulk transportation facilities - including offshore platforms and production vessels), where lives (including firefighters) are being exposed to potential harm.

Best regards,

[REDACTED],

Director and Technical Specialist - Firefighting Foams and Foam Systems,
Willson Consulting, Tasmania, Australia.