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Sent: 30.08.2023 21:51:26
To: Guy Parker[REDACTED]@acumenpa.com]; ECHA Restriction PFAS[restriction-REDACTED]@echa.europa.eu]
Subject: Question on PFAS REACH restriction and scope of 'Marine Applications'
Dear Mr. Parker,

Thank you for your email and your question about reefers.

I assume that you refer to Article 2 – Application, point 1 (d):

1. This Regulation shall not apply to:

...

(d) the carriage of dangerous substances and dangerous substances in dangerous mixtures by rail, road, inland waterway, sea or air.

It is the dossier submitters understanding that the carriage of dangerous substances/mixtures by sea is something different than using a refrigerated container for the transport of goods. Hence, we do not interpret point 1 (d) as an exempt for reefers and they should be considered covered by the PFAS restriction proposal.

Best regards,
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Emne: Question on PFAS REACH restriction and scope of 'Marine Applications'

Dear Colleagues,

I hope this email finds you well.

I am reaching out with a question from one of our clients, related to the use of F-gases and a particular product called a 'reefer' which is a refrigerated container (shipping container) used in intermodal freight transport. The question is related to the PFAS REACH restriction proposal and implications for their products.

Question: How should our client understand the scope of "Marine applications" under the restriction proposal as there is no clear definition presented in the text. Ocean-going international containers are exempted from the current REACH regulation under Article 2 'Application'. Are they therefore excluded from the REACH restriction?

Many thanks if you are able to clarify.

Kind regards,

Guy.

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