

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: FFFs restriction
Date: 13 July 2021 16:10:16
Attachments: [Extracts of US DOD law.docx](#)

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Dear [REDACTED]

While waiting for [REDACTED] I attach the information we received from the US DoD on the bill concerning AFFFs.

Kind regards

[REDACTED]

From: [REDACTED] (GROW) <[REDACTED]>
Sent: Tuesday, July 13, 2021 2:34 PM
To: [REDACTED] (ECHA) <[REDACTED]> [REDACTED] (GROW)
<[REDACTED]> [REDACTED] (ENV)
<[REDACTED]>
Cc: [REDACTED] (ECHA) <[REDACTED]> [REDACTED] (ECHA)
<[REDACTED]>
Subject: RE: FFFs restriction

Dear [REDACTED] and [REDACTED]

If you could please clarify the following in your comments

Note that the US defence is also banning PFAS, (made by [REDACTED])

I have not seen any information on the uses of FFFs for defence ; I found on the net for the food packaging for military personnel and there they include only the PFOA and PFOS.

Can you send us the source you found on banning the FFFs and for which uses? The information , the specifications etc.

It will help me to understand

This is not urgent as you are on holidays but I send it to you as I do not want to forget it. Did the European MoDs have send you any information on US military defence?

Maybe you have this information in the future restriction.

Kind Regards

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Friday, June 18, 2021 4:15 PM
To: [REDACTED] (GROW) <[REDACTED]> [REDACTED]
[REDACTED] (GROW) <[REDACTED]> [REDACTED] (ENV)
<[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED] (ECHA)
<[REDACTED]>
Subject: RE: FFFs restriction

Dear [REDACTED] Amie and [REDACTED]

Thank you very much for your feedback on the PAIR report, these are useful comments. Please see our replies/comments in the attached file (I kept only the PAIR part, removing the Annex XV dossier on which there were only a couple of comments that I brought back in the PAIR).

Do not hesitate to come back on our comments. I will now be off until end of July but will follow-up after that.

[REDACTED] I take the occasion to respond to your questions on defence in blue in the below email.

Best regards,

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: 17 June 2021 11:55
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED]
<[REDACTED]>
Subject: FFFs restriction

Dear [REDACTED]

I have read in the PAIR the following

Alternatives are less well established in the military sector, **but they are considered by stakeholders to be feasible**, have been adopted by the Danish and Norwegian armed forces^[1], and the applications are similar to those of other similar sectors (with similar activities such as aerospace), where substitution has taken place. Transition is probably possible but requires extra care because if the use of alternative caused any fire-safety risks, the potential damages could be significant and could include danger to human life.

[According to the IPEN publication on "Fluorine-free firefighting foams (3F) viable

alternatives to fluorinated aqueous film-forming foams (AFFF)".]

1. What has been adopted for the Danish and Norwegian armed forces ? Do you have any information ? (**the specificity of their uses**). Would it be possible to learn from the DK where they have adopted the F3 , in which applications?

Unfortunately neither the Danish nor Norwegian armed forces replied to our survey, so I do not have precise information on this. However, I think it is a good idea to ask them.

2. The stakeholder (one) was the Eurofeu from the workshop but I find it speculative.
Are the applications similar to those of aerospace ?

From the information we received from the MoDs a couple of weeks ago, some of them indicate that the presence of ammunitions in proximity with fuel and people is a characteristic which require the foam to be particularly effective in preventing large losses in case of a fire incident. Unfortunately we did not receive a lot of detailed justifications for this. However, I would consider them different from the aerospace sector due to the presence of ammunitions and marine uses. Note that I understand from your colleague [REDACTED] [REDACTED] that military ships are exempted from the IMO conventions, and therefore also from the scope of the EU Marine Equipment Directive which is the regulatory tool which would be needed to be used to transpose the REACH requirements to ships. Therefore, if I get it right, a REACH restriction would (1) not be applicable to military ships and (2) need to be implemented via the Marine Equipment Directive for the civil ships.

Kind Regards

[1] According to the IPEN publication on "Fluorine-free firefighting foams (3F) viable alternatives to fluorinated aqueous film-forming foams (AFFF)".