

Helsinki, 6 September 2024

Vicky Cann
CEO
Rue d'Edimbourg 26
1050 Brussels
Belgium

Sent by email only: ask+request-14107-ce47ef95@asktheeu.org

Subject: Reply to your request for access to documents

Reference: ATD/061/2024

Dear Ms Cann,

I refer to your request for access to documents under Regulation (EC) No 1049/2001 (the "ATD Regulation") dated 6 June 2024, registered on 10 June 2024, under the above-mentioned number.

Your request concerns access to documents related to lobbying on PFAS, per and polyfluoroalkyl substances. In particular:

1. A list of all meetings/ discussions since 26 January 2024 between officials and businesses, trade associations, or think tanks where this topic was discussed.
2. Any records, minutes, preparatory briefings, or other notes of these meetings/discussions.
3. All correspondence since 26 January 2024, where this topic was discussed, exchanged between officials and businesses, trade associations, or think tanks.

ECHA has identified 35 documents to be disclosed, please see the list of documents in Annex I.

Decision

Based on Article 7(1) of the ATD Regulation¹

ECHA has decided to grant you partial access to 35 of the requested documents.

You can find the non-confidential versions of the documents enclosed in the zip file and listed in this letter.

¹ [Regulation \(EC\) No 1049/2001 of the European Parliament and of the Council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents.](#)

Reasons

Following an individual assessment of the documents requested under the provisions of the ATD Regulation and taking into account the comments received from the consulted third parties, ECHA has concluded that their disclosure is partly prevented by the exception to the right of access laid down in Article 4 of this regulation. The reasons as to why specific redactions have been performed are provided below.

Protection of privacy and the integrity of an individual

The exception provided by Article 4 (1)(b) of the ATD Regulation on the protection of personal data was found to apply to the names, signatures and contact details contained in the requested document. The necessity to have this data transferred for a specific purpose in the public interest, as required by Regulation (EU) 2018/1725, has not been established. Therefore, the information at issue has been redacted from all the documents.

Procedural history

On 26 June 2024, we made a fair solution proposal in accordance with Article 6(3) of the ATD Regulation to extend the deadline for a maximum of three months as your application concerned a large number of documents and third-party consultations were needed to be carried out over the summer. On 1 July 2024, you proposed a 10-week deadline and we accepted that.

Means of redress

You are entitled to make a confirmatory application requesting ECHA to review this position by writing to the Executive Director of ECHA (P.O Box 400, 00121 Helsinki, Finland or executive-director@echa.europa.eu). This needs to be done within 15 working days, as applicable in your country, of receiving this letter.

Yours sincerely,

(e-signed)²

Head of Risk Management Unit I

Encl: See separate files listed in Annex I below.

² As this is an electronic document, it is not physically signed. This communication has been approved according to ECHA's internal decision-approval process.

Annex I - List of 35 disclosed documents – ATD/061/2024

1. AW_ Meeting request - ECHA_DSV_Redacted
2. ACC -ED ECHA Roundtable Note 25March2024_Redacted
3. 2024-04-09 Applia request for meeting_Redacted
4. 2024-03-27 ACC GlobalChem conference - EU Panel Questions - ECHA_Redacted
5. For the ATD (maybe)_ Visit Dr_May 14-17_Redacted
6. Meeting Request - ExxonMobil_Redacted
7. RE_ RTX Global Chemical Substances Programs - meeting request_Redacted
8. 04_2024-02-21_217_ACI's PFAS Summit
9. 04_2024-02-21_217_ACI's PFAS Summit_att
10. 07_2024-04-24_ACEA_TF REACH attendance list
11. 08_2024-04-29_CEWEP input in ECHA format
12. 09_2024-05-02_239_Invitation to speak at_ FERMA FORUM 2024 (20-22 October 2024_ Spain)
13. 10_2024-05-02_246_ For decision - New speaking Request 967709 - 11th Polish Chemistry Congress (6-7 June 2024_ Poland)
14. speaking request 956582
15. speaking request 955385
16. 01_2024-02-02_210_EU PFAS Conference Call Speaker Invitation
17. 06_2024-04-10_232_Request for adding a report to the comments for ECHA - Reference number 9e6556a1-5ff9-4644-b518-b058eae68d9b
18. 11_2024-05-16_255_Joint Statement on PFAS
19. 12_2024-05-16_European Research and Technology Organizations Joint Statement PFAS
20. 13_2024-05-20_EASA
21. 13_2024-05-20_EASA_att
22. 14_2024-05-21_250_Discussion on Waste-to-Energy and PFAS + Incineration Temperatures FluoropolymersPFAS - CEWEP
23. 15_2024-05-22_FPP4EU letter on stakeholder contribution to the U-PFAS restriction proposal
24. 16_2024-05-22_FPP4EU Letter ECHA_STO_UPFAS
25. 17_2024-05-31_253_FPP4EU Collaboration Platform 20 June meeting - developments on the U-PFAS Restriction Proposal
26. 17_2024-05-31_253_FPP4EU Collaboration Platform 20 June meeting - developments on the U-PFAS Restriction Proposal_att1
27. 18_2024-06-17_251_FPP4EU Collaboration Platform 20 June meeting - developments on the U-PFAS Restriction Proposal
28. 18_2024-06-17_251_FPP4EU Collaboration Platform 20 June meeting - developments on the U-PFAS Restriction Proposal_att2
29. 19_2024-18-01_201_Ministry of Economic Affairs Baden-Württemberg Invitation for participation on exchange on PFAS
30. ATD - PFAS related letter- DOC 55 3791 - PFAS - Schriftelijk adviesaanvraag Demande d'avis écrit
31. ATD - PFAS related letter- DOC 55 3791 - PFAS - Schriftelijk adviesaanvraag Demande d'avis écrit_att
32. FPP4EU letter on stakeholder contribution to the U-PFAS restriction proposal
33. FPP4EU letter on stakeholder contribution to the U-PFAS restriction proposal_att
34. Reply to speaking request 967499_Redacted
35. Reply to speaking request 966051 Redacted