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Sent: jeudi 17 juin 2021 10:57
To: SCHREIBER Kristin (GROW); [REDACTED] (GROW); [REDACTED] (GROW); [REDACTED] (GROW)
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Subject: Minutes meeting with 3M 15 June 2021

Meeting with 3M DG GROW, 15 June 2021. 11:30-12:30

Participants:

3M :

DG GROW : Kristin Schreiber,

- **Welcome:** KS welcomed everyone to the meeting and presented the COM team.
- **Presentation:** 3M introduced the participants attending the meeting and made a presentation of the company and their position as regards the Green Deal objectives and the Chemicals Strategy (presentation attached). 3M advocates for consistency between different objectives as we need chemicals for innovation for the twin transition, calls for proportionality and science based legislation.

- **On essential uses:** 3M uses PFAS in more than 10 000 products, complete mapping took 6 months. The concept of essential uses has been applied with a scoring system based on different parameters, partly based on Ian Cousin's paper. However, one of the main challenges is the subjectivity of the concept. 3M gave an example of conflicting objectives in relation to essentiality: substituting SF6 (potent greenhouse gas) with a polymeric PFAS is possible, however, the alternative is persistent (not B or T). To make the essential use concept work, 3M calls for a granular approach, e.g. if used in closed systems, and that essentiality should be used in combination with a risk assessment (and life cycle assessment to avoid regrettable substitution). The concern is the level of unpredictability. Definitions and criteria should not be static but the policy framework should be flexible enough to foster innovation. COM confirmed that essential uses is a complex concept and thanked 3M for their reflections. The process to define what is essential will be iterative, where the importance is to get it right.
- **On COM's work on essential uses:** Includes two work strands: **(1)** implementation of chemical strategy includes an external study with at least one workshop; **(2)** restriction of all non-essential uses of PFAS by five EEA countries. COM encourage 3M to contribute to that process.

- **On REACH Revision:** 3M calls for a targeted revision of REACH preserving the overall framework and for stronger enforcement. They confirm that they are very involved in the different working groups of Cefic, on the different actions/revision of REACH, e.g. polymers requiring registration, fluoropolymers, authorisation and restriction, etc.