

Helsinki, 11 March 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 – First batch

Reference: ATD/015/2024

Dear Ms. Cann,

I refer to your request of 26 January 2024, registered on 29 January 2024, under the above-mentioned number.

Your request concerns access to:

"[...] the following documents related to lobbying on PFAS, per and polyfluoroalkyl substances. In particular I would like:

1. A list of all meetings/ discussions since 1 January 2022 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 1 January 2022, where this topic was discussed, exchanged between officials and businesses, trade associations, or think tanks."

ECHA has identified 53 documents potentially to be disclosed, however, due to ongoing assessment and third-party consultations only 27 documents (first batch) can be disclosed at this stage (see zip file attachment).

Decision

Based on Article 7(1) of the ATD Regulation¹

ECHA has decided to grant you partial access to 27 of the requested documents

You can find the non-confidential versions of the documents enclosed in a zip file to 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

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 16 February 2024, we informed you that the deadline for replying to your request had to be extended for 15-working days as your application concerns a large number of documents requiring different ECHA Services and third parties to be consulted. On 5 March 2024, we made a fair solution proposal in accordance with Article 6(3) of the ATD Regulation to extend the deadline by 30 working days to complete ongoing third party consultations. Following a teleconference on 11 March 2024, it was agreed to proceed with your request in two batches with an extended deadline of 30 working days regarding the second batch (Wednesday 24 April 2024).

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

Minna Heikkilä
Head of Legal Affairs Unit

Encl: See separate zip file attachment containing 27 disclosed documents

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.

Attachment*List of 27 disclosed documents – ATD/015/2024 – First batch*

2022-06-27 ECHA reply to EEB_Chemsec_ChemTrust_Heal_IPEN_Tegengif_Redacted
2022-08-05 ECHA reply to letter BUND_EEB_Chemsec_ChemTrust_Heal_Tegengif_Redacted
2022-10-31 Willson Consulting to ECHA on PFAS exposure_Redacted
2022-12-07 Meeting 3M_Redacted
2023-01-26 ECHA meeting with 3M_Redacted
2023-01-31 Notes from the meeting – 3M visit_Redacted
2023-02-03 ASD letter to ECHA_Redacted
2023-02-20 AmCham – ECHA meeting request_Redacted
2023-02-22 CETS visit at ECHA_Redacted
2023-02-27 EEB letter to Timmermans_Redacted
2023-03-06 Agenda_ECHA AmCham_Redacted
2023-03-08 GAMMA Restriction considerations_Redacted
2023-03-10 SEAC reply to Sthamer_Redacted
2023-03-14 ECHA meeting with Exxonmobil_Redacted
2023-03-16 Virtual meeting ECHA – ASD_Redacted
2023-03-16 ASD Meeting Note_Redacted
2023-03-21 Discussion points for Exxonmobil_Redacted
2023-03-30 ECHA reply to Fieldfisher_Redacted
2023-05-04 EFPIA Outreach on PFAS Restriction_Redacted
2023-05-08 ECHA to Chemsec_Redacted
2023-07-17 Posteo to ECHA_Redacted
2023-10-10 CETS Position Paper_Redacted
2023-10-24 Honeywell to RAC Chair_Redacted
2023-10-31 RAC Chair to FPP4EU_invitation as speaker_Redacted
2023-10-23 EEB's report on PFHxA restriction proposal_Redacted
2024-01-24 Chemsec meeting at ECHA_Redacted
2024-01-24 Informa_Chemical Industry Regulations, September 2024 (date and venue TBC)_Redacted