

Kärkkäinen Pauli (Tukes)

Lähetäjä: Kärkkäinen Pauli (Tukes)
Lähetetty: tiistai 4. lokakuuta 2022 18.13
Vastaanottaja: [REDACTED]@eppa.com
Aihe: RE: Meeting request - F-gases in F-Gas Regulation revision / PFAS Restriction

Reg. no. Tukes 9909/04.00.00/2022

Dear Mr. Sokol-Szahn,

I apologize for my very late reply and thank you for your request for a meeting with the Finnish Safety and Chemicals Agency to discuss the restriction proposal for all per- and polyfluoroalkyl substances (PFASs). Your message was forwarded to me as Ms. Ekman's substitute but unfortunately I forgot to finalize my draft earlier.

To come back to the issue, it should be noted that we are not involved with the preparatory activities of the restriction proposal. Therefore, we would not have considered that a meeting at this stage would bring added value and would have declined for the request. However, we consider that stakeholder input and scientific data is important for the regulatory process and outcome. ECHA's public consultation on this restriction proposal will probably be held next year. We advise you to use the formal mechanism for consulting stakeholders in order to make the information you provide available for all the relevant bodies at the appropriate stages of the process. Please consult the ECHA websites at <https://echa.europa.eu/fi/registry-of-restriction-intentions/-/dislist/details/Ob0236e18663449b> for timely information on this restriction proposal.

Best regards,

Pauli Kärkkäinen

Ryhmäpäällikkö, Teollisuus- ja kuluttajakemikaalit |
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Lähetäjä: Carlos Sokol-Szahn <[REDACTED]@eppa.com>
Lähetetty: tiistai 30. elokuuta 2022 11.40
Vastaanottaja: Finel Nufar <[REDACTED]@syke.fi>; [REDACTED]@tukes.fi
Aihe: RE: Meeting request - F-gases in F-Gas Regulation revision / PFAS Restriction

Dear Ms Finel and Ms Ekman,

I hope you are doing well and had a relaxing summer break.

I am following up on my previous email (below) to see whether it would be possible to organise a meeting with you in the next weeks to discuss the FGR review and PFAS Restriction.

We are mostly flexible as of 13 September to schedule the call. We would appreciate very much the opportunity to exchange views on these very important dossiers.

Thank you very much in advance and do not hesitate to contact us if you have any questions.

Best regards,
Carlos

From: Carlos Sokol-Szahin <[REDACTED]@eppa.com>
Sent: Wednesday, 29 June 2022 10:20
To: [REDACTED]@syke.fi; [REDACTED]@tukes.fi
Subject: Meeting request - F-gases in F-Gas Regulation revision / PFAS Restriction

Dear Ms Finel and Ms Ekman,

I hope you are doing well.

My name is Carlos Sokol-Szahin and I am working at EPPA which is a Brussels-based regulatory/public affairs consultancy, specialising in chemicals, sustainability and energy issues among others. I am reaching out to you to request a meeting to discuss the revision of the F-Gas Regulation (FGR) and upcoming PFAS restriction.

Our request concerns two areas impacted by these regulatory developments: (1) Refrigerants (including hydrofluorocarbons (HFCs), hydrofluoroolefins (HFOs) and natural refrigerants) which are used in heat pump and air conditioning applications and (2) Sulfuryl Fluoride (SF), which is a broad-spectrum fumigant that is being used globally for pest control – for example, to fight bark beetles, stink bugs and woodworms.

Regarding the first area, we would like to invite our client Viessmann to the meeting. To give you some background information, Viessmann is a leading German/European company in the manufacturing of heating, industrial and refrigeration systems. In the past months, Viessmann has contributed to the F-Gas Regulation revision process by participating in the stakeholder meeting in May 2021 and submitting input to the public consultation, which ran from September to December 2020. Moreover, Viessmann has also participated in the two Calls for Evidence on the upcoming REACH PFAS restriction - July 2020 and October 2021 – which also touches upon the issue of f-gases. On this basis, our client would like to present its position and analysis of some of the aspects that could be improved in the FGR proposal, but also on the PFAS Restriction, supported by a socio-economic analysis we did for them at EPPA. We would be glad to exchange views with you on the feasibility to speed up the transition to suitable and sustainable future-proof alternatives in the heat pump market and discuss our forward-looking proposals for the next steps.

We would also like to take advantage of the meeting to discuss, on behalf of our client Douglas Products, another aspect arising from the review, namely the inclusion of the Sulfuryl Fluoride in Annex II, Section 3, of the Regulation. This fumigant is said to have a significant impact on global warming. However, there is evidence showing that the quantities of SF released into the atmosphere are far less than those of carbon dioxide and its real impact on global warming is very limited. This is reflected by the fact that SF has not been listed up until now under the Kyoto Protocol, nor under the Paris International Climate Agreement as a relevant greenhouse gas. In this case, we would like to take some time of the meeting to present to you Douglas Products' views on the FGR, the facts around SF as well as discuss how the Commission's proposal could be further improved.

We could discuss both issues in the same meeting, or organise a subsequent meeting on the latter if that is more appropriate.

If the meeting request is agreeable to you, could you please let us know when it will be suitable for you in the next weeks to have a meeting? We will be happy to send WebEx invitations.

Many thanks in advance for your reply. We remain available should you have any questions or require additional information from us in the meantime.

Best regards,
Carlos

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