

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: ECHA fire-fighting foams - submission of the dossier
Date: 18 February 2022 15:42:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear [REDACTED]

We uploaded the final firefighting documents to CIRCABC today, including the appendices.

If you are still not able to find the information you need please tell us and we can have a call to talk you through the SEA.

Yours,

[REDACTED]

Internal reference: workspace://SpacesStore/30910722-8cdc-4121-9d49-6cf831d53f7d
Path: /CircaBC/echa/Regulatory_Risk_Management/Library/05_restriction/PFAS universal restriction/Meetings/2021_07_02 Collaboration UPFAS - FFF/Documents for conformity check
Browse url: <https://webgate.ec.europa.eu/s-circabc/w/browse/30910722-8cdc-4121-9d49-6cf831d53f7d>

[REDACTED]
Senior Scientific Officer / Restriction Process Coordinator
Risk Management I / D3
European Chemicals Agency
P.O. Box 400, FI-00121 Helsinki, Finland
Tel. [REDACTED]

<http://echa.europa.eu/>



The above represents the opinion of the author and is not an official position of the European Chemicals Agency. This email, including any files attached to it, is intended for the use of the individual to whom it is addressed. If you have received this message in error, please notify the author as soon as possible and delete the message.

From: [REDACTED] <[REDACTED]>
Sent: 17 February 2022 14:47
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
[REDACTED] <[REDACTED]>
Subject: SV: ECHA fire-fighting foams - submission of the dossier

CAUTION: This email originated from outside ECHA. Do not click links or open attachments unless you know the content is safe.

Check the email address of the sender. It is possible that the name of the sender is known to you (e.g. a colleague), but the actual sender is someone else.

Dear [REDACTED]

We are currently scrutinising the version of the restriction of PFAS in firefighting foams you guided us to in your last e-mail. However, we cannot find the numbers on which you base the SEA. Is it possible you or your colleague could guide us to the relevant reference or perhaps send us the files, where you did the calculation? I know you are under time constraints to complete the dossier before the 23rd of February, therefore, if it is inconvenient at this point in time, we would still very much appreciate the information after the 23rd.

Also thank you for your nice intervention yesterday at the RIME-meeting concerning PVC.

Kind regards
[REDACTED]

Fra: [REDACTED] <[REDACTED]>
Sendt: 4. februar 2022 11:35
Til: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>
Emne: RE: ECHA fire-fighting foams - submission of the dossier

Hi [REDACTED]

We uploaded these parts to CIRCA for the UPFAS WP7. I think you can access from this location.

Please let me know if not.

Internal
reference: workspace://SpacesStore/e2ed2229-6562-4770-a33e-9529a3058a79

Path: /CircaBC/echa/Regulatory_Risk_Management/Library/05_restriction/PFAS
universal restriction/Meetings/2021_07_02 Collaboration UPFAS - FFF/Submitted
docs_uncollated

Browse
url: <https://webgate.ec.europa.eu/s-circabc/w/browse/e2ed2229-6562-4770-a33e-9529a3058a79>

Yours,

[REDACTED]

[REDACTED]
Senior Scientific Officer / Restriction Process Coordinator
Risk Management I / D3
European Chemicals Agency
P.O. Box 400, FI-00121 Helsinki, Finland
Tel. [REDACTED]
<http://echa.europa.eu/>



The above represents the opinion of the author and is not an official position of the European Chemicals Agency. This email, including any files attached to it, is intended for the use of the individual to whom it is addressed. If you have received this message in error, please notify the author as soon as possible and delete the message.

From: [REDACTED] <[REDACTED]>
Sent: 04 February 2022 12:06
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]>
Subject: SV: ECHA fire-fighting foams - submission of the dossier

CAUTION: This email originated from outside ECHA. Do not click links or open attachments unless you know the content is safe.

Check the email address of the sender. It is possible that the name of the sender is known to you (e.g. a colleague), but the actual sender is someone else.

Dear [REDACTED]

Thank you for your e-mail of 12th January. It was indeed very good news. We are looking forward to the full pre-publication on the 23rd of February.

Would it be possible for you confidentially to share the socio-economic chapters with us already now?

Kind regards

[REDACTED]

Fra: [REDACTED] <[REDACTED]>
Sendt: 12. januar 2022 10:31
Til: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED]
<[REDACTED]> [REDACTED] <[REDACTED]> [REDACTED]
[REDACTED] <[REDACTED]>
Emne: RE: ECHA fire-fighting foams - submission of the dossier

Hi [REDACTED]

I can confirm that any rumours you have heard are unfounded. We will submit the report as planned this week.

We will pre-publish the report on the 23rd of February and will be using the time between now and then to carefully integrate the hazard/risk parts of the proposal (which are from the UPFAS project) into the Annex XV report. Currently they are in separate documents.

Yours,

[REDACTED]

[REDACTED]

Senior Scientific Officer / Restriction Process Coordinator
Risk Management I / D3

European Chemicals Agency
P.O. Box 400, FI-00121 Helsinki, Finland
Tel. [REDACTED]

<http://echa.europa.eu/>



The above represents the opinion of the author and is not an official position of the European Chemicals Agency. This email, including any files attached to it, is intended for the use of the individual to whom it is addressed. If you have received this message in error, please notify the author as soon as possible and delete the message.

From: [REDACTED] <[REDACTED]>
Sent: 12 January 2022 10:34
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
[REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
Subject: ECHA fire-fighting foams - submission of the dossier

CAUTION: This email originated from outside ECHA. Do not click links or open attachments unless you know the content is safe.

Check the email address of the sender. It is possible that the name of the sender is known to you (e.g. a colleague), but the actual sender is someone else.

Dear [REDACTED]

I am writing you as we have heard some rumours that the restriction dossier on firefighting foams may not be submitted this week, is it possible that you could let us know if this is the case as it has impact on our internal planning for 2022. We will of course keep the information confidential.

Kind Regards

[REDACTED]
Senior Policy Advisor | Drinking Water and Chemicals

Ministry of Environment

Departementet | Slotsholmsgade 12 | 1216 København K | Tlf. +45 38 14 21 42 | [REDACTED]@mim.dk | www.mim.dk

[Facebook](#) | [Twitter](#) | [Instagram](#) | [LinkedIn](#)

Fra: [REDACTED] <[REDACTED]>
Sendt: 8. december 2021 16:09
Til: [REDACTED] <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
[REDACTED] <[REDACTED]> [REDACTED] <[REDACTED]>
Emne: ECHA fire-fighting foams - conditions of the restriction

Dear [REDACTED]

As promised. Here is the draft restriction conditions that we are working on at the moment. Although these are still subject to changes before submission this should give you some further insight into our proposal. Please note that these conditions may also be subject to change as a result of information received during the opinion-making stage and the Commission may also deviate from these conditions during the decision-making stage. These conditions reflect the preferred restriction option (RO3) and the committees or the Commission may consider that one of the other 'discarded' options would be the most appropriate means to address the identified risk.

If you have any questions on this text please don't hesitate to ask as it will help up to refine the proposal before submission.

Yours,

■■■■ and ■■■■

Proposed restriction

Brief title: Restriction on the export, placing on the market and use of PFAS in firefighting foams.

Column 1	Column 2
Per- and polyfluoroalkyl substances (PFAS) CAS No. various EC No. various	1. Shall not be placed on the market as substances on their own, as a constituent in other substances or in mixtures for use in firefighting foam concentrates after the transitional periods for the types and sectors of use specified in paragraphs 3 and 4 unless the concentration of total PFAS is less than 1 mg/L. 2. Shall not be exported 10 years after entry into force as substances on their own, as a constituent in other substances or in mixtures for use in firefighting foam concentrates unless the concentration of total PFAS is less than 1 mg/L 3. Shall not be used in firefighting foam concentrates with concentrations above the ones mentioned in paragraph 1 for training and testing purposes (except testing of the firefighting systems for their function), irrespective of the sector of use: 18 months after entry into force; 4. Shall not be used in firefighting agents with concentrations above the ones mentioned in paragraph 1 in portable fire extinguishers as defined by standard EN3-7, irrespective of the sector of use: 5 years after entry into force 5. Without prejudice of paragraph 3 on training and testing and 4 on portable fire extinguishers, shall not be used in firefighting foam concentrates with concentrations above the ones mentioned in paragraph 1 with the following

transitional periods per **sector or type of use**:

- a. Municipal fire services (except if also in charge of industrial fires for establishments covered by the Seveso-III Directive and for use in these establishments only): 18 months after entry into force
 - b. Civil ships: 3 years after entry into force
 - c. Establishments covered by the Seveso-III Directive (tier 1 and tier 2): 10 years after entry into force
 - d. All other uses not covered by paragraphs (a), (b) and (c): 5 years after entry into force
6. Six months after entry into force, industrial and professional users of firefighting foam concentrates containing PFAS above the threshold indicated in paragraph 1 shall:
- a. only use these foams for fires involving flammable liquids (class B fires);
 - b. establish a fire management plan for every site and type of foam use which shall include a description of the procedure and reasons for the procurement of the specific firefighting foam concentrates, their storage, use, containment and treatment and the efforts made to search for PFAS-free alternatives. The fire management plan shall: (i) aim at reducing the use of PFAS foams to the minimum necessary while transitioning to PFAS-free alternatives, (ii) be reviewed annually and kept available for enforcement authorities;
 - c. ensure the minimisation of emissions of PFAS in the environment and direct and indirect exposure to humans from all activities related to firefighting such as but not limited to: the storage and use of foam concentrates, water-added foams, fire run-off waters, mixtures used to clean the equipment containing PFAS firefighting

	foams, PFAS-containing cleaning water, media used for concentrating PFAS in PFAS-containing waste, by applying sector best practices or to the extent technically and economically feasible. The collected PFAS-containing waste with a concentration of PFAS above the one mentioned in paragraph 1 shall be incinerated in hazardous waste incinerators, cement kilns or disposed of using [other treatment techniques reducing the concentration of PFAS close to zero]. For each event of foam use or leakage handling, proof of appropriate management and disposal of the foam concentrates, water-added foams and fire run-off waters shall be documented and kept available for enforcement authorities. 7. From six month after entry into force, firefighting foam concentrates containing PFAS above the threshold indicated in paragraph 1 which are held in stock and need to be disposed of shall be incinerated in hazardous waste incinerators, cement kilns or disposed of using [other treatment techniques reducing the concentration of PFAS close to zero]. Proof of appropriate disposal shall be documented and kept available for enforcement authorities. 8. From six months after entry into force, containers of firefighting foam concentrates placed on the market or used at users' sites, containers of firewater runoffs or other PFAS-waste in relation with the use of firefighting foams or the cleaning of firefighting foam equipment in concentrations above the one mentioned in paragraph 1 shall be labelled indicating the presence of PFAS above this threshold.
--	---

Explanatory notes:

(1) "Testing of the firefighting systems for their function" means testing the fire

protection system in the same way as it would operate in case of emergency. Other types of testing include but are not limited to: testing of foam agents during their development phase, testing of foam agents by users to evaluate products' suitability on specific combustibles, testing of correct proportioning of firefighting foam concentrates.

- (2) Municipal fire services (i.e. local authority fire and rescue services) are covered under the restriction entry 5 (a.), except if they are also in charge of industrial fires for establishments covered by the Seveso-III Directive and for use in these establishments only. In this case, the transitional period of paragraph 5(c) applies.
- (3) Other uses of firefighting foams include – but are not limited to -: civil aviation, defence, aerospace, offshore oil/gas/chemical facilities, onshore oil/gas/chemical manufacturing or processing facilities which are not covered by paragraph a. (Seveso establishments), power plants, glass manufacturers, waste treatment facilities, food processing industry, metal processing, etc.
- (4) The use of PFAS foam agents in portable fire extinguishers are covered by paragraph 4, with a proposed transitional period of five years, irrespective of the sector of use, i.e. their use would be continued to be allowed during this period even if the sector where they are used is subject to a shorter transitional period (e.g. ships).
- (5) "Civil ships" refers to marine and non-marine non-defence ships.
- (6) Foam concentrates are the foam formulations purchased by the users and which are further mixed with water at the moment of the use. Water-added foams are the foam concentrates mixed with water at the moment of the use. Fire run-off waters are the run-off waters containing the firefighting foam and all other elements mixed with them during the use of the firefighting foam during a fire incident, training or other use (e.g. flammable liquids, dirt, etc).
- (7) The labelling of the containers containing PFAS above the threshold indicated in paragraph 1 aims at facilitating the identification and handling of the PFAS-based foam concentrates, firewater run off and waste.

██████████
Senior Scientific Officer / Restriction Process Coordinator
Risk Management I / D3
European Chemicals Agency
P.O. Box 400, FI-00121 Helsinki, Finland
Tel. ██████████

<http://echa.europa.eu/>



The above represents the opinion of the author and is not an official position of the European Chemicals Agency. This email, including any files attached to it, is intended for the use of the individual to whom it is addressed. If you have received this message in error, please notify the author as soon as possible and delete the message.