

Kärkkäinen Pauli (Tukes)

Lähettiläjä: Kärkkäinen Pauli (Tukes)
Lähetetty: perjantai 5. tammikuuta 2024 16.22
Vastaanottaja: [REDACTED]@epeeglobal.org
Aihe: VS: PFAS Restriction proposal – Request for meeting with EPEE

Reg. no. Tukes 13670/04.00.00/2023

Dear Mr. de Badereau,

Ms. Leinonen forwarded your message to me as I have replaced Ms. Ekman as the head of the unit. I apologize for the 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).

We understand your concern and consider that stakeholder input and use-specific information is important for the regulatory process and outcome. As Tukes cannot affect to the proposal at this stage of the process, we advise you to use the formal mechanism for consulting stakeholders in order to make the information available for all the relevant bodies in a timely and effective manner. In order to do this, you can contribute to the consultation for the SEAC draft opinion. Please follow the ECHA websites at <https://echa.europa.eu/fi/restrictions-under-consideration/-/substance-rev/72301/term> for further details and information about the deadlines.

However, also the Finnish authorities will participate the decision-making process and will take a stance on the proposed restriction at a later stage. Ministerial adviser Ms. Hanna Korhonen ([REDACTED]@gov.fi) from the Ministry of Social Affairs and Health is representing Finland in the REACH Committee.

Best regards,

Pauli Kärkkäinen

Ryhmäpäällikkö, Teollisuus- ja kuluttajakemikaalit |
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Lähettiläjä: Vincent de Badereau <[REDACTED]@epeeglobal.org>
Lähetetty: torstai 7. joulukuuta 2023 10.38
Vastaanottaja: Leinonen Riitta (Tukes) <[REDACTED]@tukes.fi>; [REDACTED]@tukes.fi
Aihe: PFAS Restriction proposal – Request for meeting with EPEE

Dear Mrs. Leinonen,
Dear Mrs Ekman,

I hope you are doing well!

I am happy to contact you on behalf of EPEE, the voice of the Refrigeration, Air Conditioning and Heat Pump (RACHP) manufacturers in Europe, an association based in Brussels. In the context of the PFAS Universal Restriction proposal submitted to the European chemical agency ECHA, we would like to highlight to you and your ministry our concerns and recommendations.

Indeed, the proposal covers a wide range of fluorinated gases, used in our sector as refrigerants, and all fluoropolymers, used as essential components for the proper functioning of the equipment.

While we understand the importance of addressing issues related to PFAS emissions, the Restriction proposal raises for us many concerns that deserve to be taken into consideration.

The RACHP products provide essential heating and cooling services to society: refrigeration for food supplies, safe transport of medicines and vaccines, comfort to citizens in homes and offices, substitution of fossil fuels by heat pumps, etc. Our products show very low leakages rates and are treated through their entire life cycle in an environmentally sound manner.

Please find in attachment a summary of our submission to ECHA, and our full submission for your information.

We would be happy to have an **online or in-person meeting with you in the coming weeks** to share our position and discuss the points that your ministry and that Finland may want to consider when the Restriction proposal will be assessed by Member States.

Thank you for your kind consideration!

With best regards,

Vincent de Badereau

Senior Policy Advisor

EPEE – European Partnership for Energy and the Environment

The Voice of the Refrigeration, Air Conditioning and Heat Pump Industry in Europe

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