

Kärkkäinen Pauli (Tukes)

Lähettäjä: Simon Terwagne (FleishmanHillard) <[REDACTED]@fleishmaneurope.com>
Lähetetty: maanantai 8. huhtikuuta 2024 16.27
Vastaanottaja: Kärkkäinen Pauli (Tukes); Marence Jurgens (FleishmanHillard)
Aihe: Re: Request for meeting with Arkema re consequences of the proposed PFAS REACH Restriction on key European value chains

Dear Mr. Kärkkäinen,

Thank you very much for your helpful response. We had to pleasure to meet in Helsinki last month as part of the AmCham delegation. I will reach out to Hanna Korhonen as you suggested. We only intend to share in a visual format what was submmitted formaly through the public consultation and seek feedback on the case.

Best regards,
Simon

Simon Terwagne
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From: Kärkkäinen Pauli (Tukes) <[REDACTED]@tukes.fi>
Date: Tuesday, 27 February 2024 at 06:39
To: Marence Jurgens (FleishmanHillard) <[REDACTED]@fleishmaneurope.com>
Cc: Simon Terwagne (FleishmanHillard) <[REDACTED]@fleishmaneurope.com>
Subject: RE: Request for meeting with Arkema re consequences of the proposed PFAS REACH Restriction on key European value chains

Reg, no. Tukes 2108/04.00.00/2024

Dear Ms. Jurgens,

thank you for contacting the Finnish Safety and Chemicals Agency (Tukes) and for your request for a meeting to discuss the restriction proposals 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 later on. 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. Ministry of Social Affairs and Health is representing Finland in the REACH Committee. If considered necessary, you can contact ministerial adviser Ms. Hanna Korhonen ([REDACTED]@gov.fi) regarding this topic.

Best regards,

Pauli Kärkkäinen

Ryhmäpäällikkö, Teollisuus- ja kuluttajakemikaalit |
Head of Unit, Industrial and consumer chemicals

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Tiedolla turvallisuutta – vastuullisemmat yritykset ja kuluttajat.

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Lähetäjä: Marence Jurgens (FleishmanHillard) <[REDACTED]@fleishmaneuropa.com>

Lähetetty: keskiviikko 14. helmikuuta 2024 10.51

Vastaanottaja: Kärkkäinen Pauli (Tukes) <[REDACTED]@tukes.fi>

Kopio: Simon Terwagne (FleishmanHillard) <[REDACTED]@fleishmaneuropa.com>

Aihe: Request for meeting with Arkema re consequences of the proposed PFAS REACH Restriction on key European value chains

Dear Mr. Karkkainen,

I am contacting you on behalf of our client Arkema to ask for a meeting this winter, tentatively as of March 2024.

Our client would like to bring to your attention important data and contextual information on the Kynar® PVDF uses, a fluoropolymer, explain the status on emissions across the polymer life cycle, emission reduction measures, and end-of-life management for fluoropolymers (including recycling and incineration). Kynar® PVDF is a durable advanced material and a critical component in batteries, semiconductors, vaccines manufacturing, medical devices, water treatment and ultra durable architectural coatings just to name a few.

Arkema is a pioneer in the substitution of fluorosurfactants. The company is completing its transition to 100% production without fluorosurfactants in the next months at the Pierre-Bénite site in France.

Arkema submitted data to the ECHA public consultation, including a rigorous evaluation of the emissions associated with Kynar® PVDF through its life cycle, end of life solutions, together with a comprehensive assessment of the alternatives and a socio-economic assessment.

PFAS Submission ID numbers: 4424, 6918, 6920, 7140

PFAS Submission table numbers: 17, 52, 52, 57

We would welcome the opportunity to exchange on this critically important file with you given the unprecedented volume of information submitted during the public consultation and the potential unintended consequences linked with a broad ban of fluoropolymers.

I look forward to hearing back from you, and do not hesitate to get in touch with any question you may have.

Best regards,

Marence

On behalf of



Marence Jurgens (she/her)

Senior Account Executive | [Environment Practice](#)

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