

From: [REDACTED] (GROW)
Sent: lundi 28 août 2023 08:46
To: [REDACTED] (DIGITALEUROPE)
Cc: GROW F1; [REDACTED] (GROW)
Subject: RE: Joint industry paper: PFAS in electronics spare parts and pre-owned products

Dear [REDACTED]

Thank you for your email regarding PFAS in electronics spare parts and pre-owned products, including the joint industry paper on this topic. As discussed before it is very important to submit this information during the on-going consultation by ECHA. Therefore, I very much welcome the effort you made and brought the issue to attention of ECHA.

For the moment, I do not see the need to organize a meeting.

Kind regards,



European Commission
DG for Internal Market, Industry, Entrepreneurship and SMEs
REACH

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From: [REDACTED] [@digitaleurope.org](mailto:[REDACTED]@digitaleurope.org)>
Sent: Wednesday, August 2, 2023 4:51 PM
To: [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Cc: [REDACTED] [@ec.europa.eu](mailto:[REDACTED]@ec.europa.eu)>
Subject: Joint industry paper: PFAS in electronics spare parts and pre-owned products

Dear [REDACTED]

On behalf of DIGITALEUROPE and a broad coalition of leading global industry associations in the electronics industry, it is my pleasure to bring to your attention a joint paper on PFAS in electronics spare parts and pre-owned products.

The undersigned group of associations support the European Commission's ambition to phase out the use of PFAS wherever possible in a timely manner. On behalf of our members, we request that the following derogations should be added to the proposed EU universal PFAS restriction under REACH:

- Spare parts for repair of finished consumer electronic equipment already placed on the market,
- Spare parts for repair of finished professional business-to-business electronic equipment already placed on the market,
- Re-supply of articles already placed on the market (pre-owned products)

We believe that these derogations are critical to help achieve EU goals of avoiding premature obsolescence and for compliance with laws promoting product longevity. The concepts of "right to repair" and allowing resale of pre-owned products have been broadly incorporated into other EU substance restrictions, and other EU REACH restrictions, and it is essential to incorporate them into the EU PFAS restriction to avoid major market disruptions.

These requests have also been brought to attention of the ECHA Committees currently examining the proposed uPFAS restriction.

We would welcome a meeting with you at a time of your convenience to discuss these requests and answer any questions you may have. Many thanks in advance for your attention.

Best regards,

[Redacted signature]



[DIGITALEUROPE](#)

