

Honeywell Fluorine Products Europe B.V.
Attn: Vice President Julien Soulet
Stationsplein Zuid-West 961
1117 CE Schiphol-Oost

Your ref

Our ref
20/2420-4

Date
5 November 2021

European restriction proposal on the manufacture and use of PFAS

Dear Mr. Soulet,

Thank you for the inquiry regarding the REACH restriction proposal under preparation. Your letter of 7 October was forwarded to us from the Ministry of Trade, Industry and Fisheries.

Norway is working together with Germany, the Netherlands, Denmark and Sweden on a REACH restriction proposal to limit the risks to the environment and human health from the manufacture and use of all per- and polyfluoroalkyl substances (PFAS). PFAS are known to be highly persistent in the environment and have been frequently observed to contaminate groundwater, surface water and soil. If releases continue, they will keep accumulating in the environment, drinking water and food. Certain PFAS are also known to accumulate in humans causing serious health effects such as cancer and liver damage.

The purpose of the restriction is a shift to fluorine free alternatives, and not to limit for example the future use of energy-saving equipment. Regarding the F-gases, in many cases alternatives are already available, or expected to be so in the near future. In general, REACH restrictions will require a shift in industry. Socio-economic assessments will be part of in the proposal.

The definition of PFAS used in the work on the restriction proposal is the same as the updated OECD/UNEP Global PFC Group definition, and in line with scientific publications regarding definition and scope for an universal PFAS regulation. A thorough justification of the choice of definition will be included in the Annex XV report.

In line with the procedures for REACH restriction proposals, companies are invited at several occasions to submit information about the substances under assessment. This include direct requests to companies. In addition, for the PFAS restriction, the dossier submitters have invited stakeholders to submit information during two consultations organised by the European Chemicals Agency, ECHA (Call for Evidence May-July 2020 and July-October 2021). Submissions by Honeywell was received last year, also on the F-gases. This information is already in the knowledge base used by the consultant assessing the uses of F-gases. The second consultation included an invitation to evaluate the complied information, and several specific questions about alternatives were raised. Stakeholder information will be presented in the Annex XV report. Once the proposal is submitted to ECHA, it will move to ECHA's scientific committees for opinion making. Public consultations will be part of this process, with the possibility for further input by stakeholders to ECHA.

We will forward the information you sent to us to the Norwegian Environment Agency, as the responsible national authority for the work on the REACH restriction proposal. The Norwegian Environment Agency will ensure that the information is shared with all the dossier submitters.

Yours sincerely

Hæge Johanna Andenæs
Director General

Ida Juell
Deputy Director General

This document is signed electronically and has therefore no handwritten signature

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Nærings- og fiskeridepartementet