

Kärkkäinen Pauli (Tukes)

Lähettäjä: Kärkkäinen Pauli (Tukes)
Lähetetty: torstai 15. kesäkuuta 2023 14.44
Vastaanottaja: [REDACTED]@kreab.com
Kopio: [REDACTED]@gov.fi; Räisänen Jouni (Tukes)
Aihe: RE: Daikin – PFHxA restriction proposal – Meeting request

Reg. no. Tukes 6311/04.00.00/2023

Dear Ms. Skritaite,

Registrar's Office forwarded your message to me as my group is mainly involved with the proposal from Tukes. 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 proposals for all per- and polyfluoroalkyl substances (PFASs) as well as the proposal for a restriction of undecafluorohexanoic acid (PFHxA), its salts and related substances.

Regarding the restriction proposals for all per- and polyfluoroalkyl substances (PFASs), we do not consider that a meeting at this stage would bring added value and, therefore, politely decline for the request. However, we consider that stakeholder input and relevant data is important for the regulatory process and outcome. ECHA's public consultation on this restriction proposal is ongoing. Therefore, we advise you to use the formal mechanism for consulting stakeholders in order to make the information you provide available for all the relevant bodies at the appropriate stages of the process. Please consult the ECHA websites at <https://echa.europa.eu/fi/restrictions-under-consideration/-/substance-rev/72301/term> more information on this restriction proposal.

The proposal for a restriction of undecafluorohexanoic acid (PFHxA), its salts and related substances is on the agenda of REACH committee next week. For your information, the Ministry of Social Affairs and Health is representing Finland in the REACH Committee. If considered necessary, you can contact ministerial adviser Ms. Hanna Korhonen (in copy to this email).

Best regards,

Pauli Kärkkäinen

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

Turvallisuus- ja kemikaalivirasto (Tukes) |
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Lähettäjä: Jurgita Skritaite <[REDACTED]@kreab.com>
Lähetetty: keskiviikko 31. toukokuuta 2023 11.46
Vastaanottaja: Tukes kirjaamo <[REDACTED]@tukes.fi>
Aihe: Daikin – PFHxA restriction proposal – Meeting request

Dear Sir/Madam,

Since February I do not receive any feedback regarding our request. It might be my emails do not reach the right person, therefore, I would appreciate if you could advise me regarding to whom to contact on the PFHxA restrictions proposal.

Our client, Daikin, is one of the world's leading producers of air conditioning and refrigeration equipment as well as fluorochemicals. Daikin would be grateful for the opportunity of a meeting with your experts on **the proposal for a restriction of PFHxA, its salts and related substances under the REACH Regulation**.

I would sincerely appreciate if you could address me to person dealing with PFHxA restrictions.

Best regards,
Jurgita



WORLDWIDE

Jurgita Skritaite

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From: Jurgita Skritaite
Sent: Friday, 12 May 2023 13:42
To: [REDACTED]@tukes.fi
Subject: Daikin – PFHxA restriction proposal – Meeting request

Dear Mr Räisänen,

I'm trying again to reach out to you on behalf of **Daikin**. Daikin is one of the world's leading producers of air conditioning and refrigeration equipment as well as fluorochemicals. Daikin would be grateful for the opportunity of a meeting with you on **the proposal for a restriction of PFHxA, its salts and related substances under the REACH Regulation**.

More specifically, Daikin would like to explain its **threshold proposal for PFHxA and its salts in fluoropolymers**. To the best of our knowledge, Daikin is the only company that uses PFHxA ammonium salt (APFHx) to produce fluoropolymers, in particular fluoroelastomers (FKM). As you are likely aware, the ECHA Committees had requested further evidence to define suitable thresholds in fluoropolymers. Taking this into consideration, Daikin conducted additional analytical works as well as trial production tests to further reduce PFHxA impurity levels in its FKM grades.

In addition, Daikin would like to take the opportunity to share its concerns with regard to **the recently published draft restriction proposal on all PFAS, particularly the proposed ban on the use of PFAS polymerization aids in the production of FKM in Europe**.

We would propose to hold such a meeting in May or June, preferably in the morning.

In case you are not the right person, I would sincerely appreciate if you could address me to person dealing with PFHxA restrictions.

We thank you in advance for your consideration and look forward to hearing from you.

Kind regards,
Jurgita

From: Jurgita Skritaite
Sent: Tuesday, 14 March 2023 13:15
To: [REDACTED]@tukes.fi
Subject: Daikin – PFHxA restriction proposal – Meeting request

Dear Mr Räisänen,

It might be my email get lost; therefore I'm coming back on behalf of **Daikin**. Daikin is one of the world's leading producers of air conditioning and refrigeration equipment as well as fluorochemicals. Daikin would be grateful for the opportunity of a meeting with you on **the proposal for a restriction of PFHxA, its salts and related substances under the REACH Regulation**.

More specifically, Daikin would like to explain its **threshold proposal for PFHxA and its salts in fluoropolymers**. To the best of our knowledge, Daikin is the only company that uses PFHxA ammonium salt (APFHx) to produce fluoropolymers, in particular fluoroelastomers (FKM). As you are likely aware, the ECHA Committees had requested further evidence to define suitable thresholds in fluoropolymers. Taking this into consideration, Daikin conducted additional analytical works as well as trial production tests to further reduce PFHxA impurity levels in its FKM grades.

In addition, Daikin would like to take the opportunity to share its concerns with regard to **the recently published draft restriction proposal on all PFAS, particularly the proposed ban on the use of PFAS polymerization aids in the production of FKM in Europe**.

We would propose to hold such a meeting in March or April, preferably in the morning.

In case you are not the right person, I would be grateful if you could address me to person dealing with PFHxA restrictions.

We thank you in advance for your consideration and look forward to hearing from you.

Kind regards,
Jurgita

From: Jurgita Skritaite
Sent: Monday, 27 February 2023 15:31
To: [REDACTED]@tukes.fi
Subject: Daikin – PFHxA restriction proposal – Meeting request

Dear Mr Räisänen,

We are writing to you on behalf of **Daikin**, one of the world's leading producers of air conditioning and refrigeration equipment as well as fluorochemicals. Daikin would be grateful for the opportunity of a meeting with you on **the proposal for a restriction of PFHxA, its salts and related substances under the REACH Regulation**.

We understand that the European Commission intends to finalise its legislative proposal in the coming weeks. The restriction proposal is therefore expected to be on the agenda of the REACH Committee shortly.

More specifically, Daikin would like to explain its **threshold proposal for PFHxA and its salts in fluoropolymers**. To the best of our knowledge, Daikin is the only company that uses PFHxA ammonium salt (APFHx) to produce fluoropolymers, in particular fluoroelastomers (FKM). As you are likely aware, the ECHA Committees had requested further evidence to define suitable thresholds in fluoropolymers. Taking this into consideration, Daikin conducted additional analytical works as well as trial production tests to further reduce PFHxA impurity levels in its FKM grades.

In addition, Daikin would like to take the opportunity to share its concerns with regard to **the recently published draft restriction proposal on all PFAS, particularly the proposed ban on the use of PFAS polymerization aids in the production of FKM in Europe**.

We would propose to hold such a meeting in March or April, preferably in the morning.

In case you are not the right person, I would be grateful if you could address me to person dealing with PFHxA restrictions. In the past, we had a meeting with Annette Ekman, however it seems she is no longer working in the agency.

We thank you in advance for your consideration and look forward to hearing from you.

With kind regards,
Jurgita