

From: [REDACTED]@kreab.com>
Sent: mercredi 21 novembre 2018 15:56
To: [REDACTED] (GROW); [REDACTED] (GROW); [REDACTED] (GROW)
Subject: meeting request CEFIC/FluoroCouncil _ PFHxA SVHC proposal _ ELoC
Attachments: FluoroCouncil response PFHxA SVHC consultation_191018.pdf; CEFIC response PFHxA SVHC PC.pdf

Categories: !!

Dear [REDACTED], [REDACTED], [REDACTED]

I'm writing to you on behalf of the FluoroCouncil and CEFIC regarding a meeting request to discuss the SVHC PFHxA proposal and its policy implications. The proposal is on the agenda of the upcoming MSC meeting.

As reflected in various comments submitted during the public consultation, a major concern about the proposal is that it uses for the first time the equivalent level of concern (Article 57f) for environmental effects other than ED, on the basis of criteria which have not been properly defined. A policy discussion should take place in a similar way to the approach adopted for ELoC for human health effects in the case of sensitizing substances. For sensitizing substances, the discussion resulted in a policy paper of ECHA.

Without such a process, the SVHC proposal would create a precedent leading to legal uncertainty on which substances could be identified as SVHC, and with possible serious impacts on various industry sectors.

[REDACTED], from CEFIC, would be available to join our meeting.

Would you be available during the **week of 3 December**, the week preceding the discussion in the MSC?

I'm attaching to that email the contributions of the FluoroCouncil and CEFIC to the consultation.

Looking forward to hearing from you,
Kind regards,
[REDACTED]

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