

5.1.2e

RIVM
Antonie van Leeuwenhoeklaan 9
3721 MA Bilthoven
The Netherlands

04 August 2021

Re: Request for an extension to ensure robust data on PFAS

Dear 5.1.2e

As a group of PFAS producers and users, we welcome the opportunity to review the summary of the market studies and help provide further data to develop the REACH restriction proposal for PFAS-related chemistries. Given the large number of possible uses and related potential exposure patterns, alongside the concerns over environmental and human health impacts, it is vital that these restriction proposals are based on a robust and comprehensive data set. Producers and users of PFAS are well-placed to provide such information.

To ensure quality and robust data, **FPP4EU kindly requests that authorities grant an extension to the second stakeholder consultation on the restriction of PFAS until mid-October 2021.** This will enable our companies to:

- Verify the content and data of the reports presented by the five European authorities on their specific PFAS topic areas. A first check revealed that, in certain cases, not all submitted information has been included.
- Consult with downstream users on the availability/ impact of alternatives in their processes/ products and to discover what a potential restriction means for them.
- Consolidate any data as per the request of German authorities in the ChemicalWatch PFAS conference of 24 June 2021.
- Account for the reduced resource due to the summer break.

We propose to provide basic data and commentaries to the authorities by the current deadline, while informing them about the ongoing data collection (and verification) and its timing. In our opinion, it would be highly beneficial to combine this with **expert technical meetings on specific topics/ data gaps in September** to ensure that any resulting restriction dossier is as robust and comprehensive as possible.

Fluorinated Products and PFAS for Europe (FPP4EU)

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A sector group of Cefic 

European Chemical Industry Council - Cefic aisbl

EU Transparency Register n° 64879142323-90



We understand that other industry sector groups may request a similar extension and we are ready, where appropriate, to work with them towards the submission of data of the highest quality. We will also make identical requests to the other authorities involved in this process.

We are committed to engaging with all stakeholders on the PFAS-topic for Europe.

Yours sincerely,

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