

[REDACTED]

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European Chemicals Agency
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nachrichtlich:
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BETREFF ECHA's Restriction proposal of PFAS (per- and polyfluoroalkyl substances) in Fire fighting foams (FFF);
here: [REDACTED] feedback to your request for clarification, dated June 28, 2021

BEZUG 1. your email „EDA pMS Responses and EDA General Feedback to ECHA Survey on PFAS in Fire-Fighting Foams -
June 2021“, dated June 28, 2021

2. [REDACTED]

[REDACTED]
04. August 2021

Dear [REDACTED],

thank you for acknowledging the concerns of the defence sector about the impending loss of skills in fuel fire fighting as a result of the intended restriction of the market availability of PFAS and for giving us the opportunity to comment on this (reference 1).

1. You have asked for a more detailed explanation of why the defence sector needs a longer transition period than the previously planned 3-6 year period for the PFAS exit. In addition to my letter of June 1, 2021 (reference 2), I am making the following comments

PFAS are currently required in the [REDACTED] to ensure fire protection in systems of the air force and the navy.

The fire extinguishing agents that meet civil requirements do not necessarily also meet military requirements.

A challenge for firefighting in the military sector that goes beyond civilian requirements is posed by the explosives and ammunition carried along, which involve increased security risks and require the highest level of efficiency when extinguishing and preventing re-ignition.

While a corresponding fire event at a home base of the [REDACTED] can possibly still be controlled by the massive use of extinguishing agents and fire protection forces as well as by monitoring the source of the fire for a sufficiently long period of time to prevent burn-back, this cannot be guaranteed under the threats prevailing during the deployment. Here, fire fighting must be highly efficient and reliable, so that the fire-fighting personnel can quickly withdraw to protect themselves from hostile threats.

A major shortcoming of the currently known PFAS-free fire-fighting foams is their insufficiently broadband, temperature-independent effectiveness under the extreme climatic conditions prevailing in military operations. In view of the unsuccessful development of a broadband, temperature-stable PFAS replacement foam, it is unrealistic that the breakthrough will be achieved in the period of 3-6 years forecast by ECHA. A much longer period of at least 10-12 years should be set for this.

With regard to the question of the time perspective for the PFAS phase-out, it should also be noted that the phase-out cannot be achieved solely through the availability of a material alternative. The usability as extinguishing foam is only guaranteed in connection with the fire extinguishing system (storage tank, mixer, piping (with stationary, permanently installed fire extinguishing system), distributor nozzle, etc.). The construction of a fire extinguishing distribution system that is adapted to the extinguishing foam and its specific properties (e.g. viscosity, miscibility with water, ...) can possibly be solved in a comparatively short time from an engineering point of view. [REDACTED]

[REDACTED]

[REDACTED] Against this background, it is imperative that the in-service ships of [REDACTED] can be continuously supplied with the currently approved foaming agents.

Finally, it should be noted that the intended regulation is important for extremely rare emergencies and extreme situations. So far, no fire incidents have occurred in [REDACTED] that should have been fought with PFAS.

2. Furthermore, you ask for a discussion of the risk management to avoid PFAS contamination when using appropriate extinguishing foams by the armed forces

For years, [REDACTED] has been taking into account the environmental and health risks caused by PFAS in an exemplary manner with the following concept of measures:

- The use of foam extinguishing agents containing PFAS is forbidden for the training / maintenance of fire protection personnel.
- Technical inspections of fire fighting vehicles and their equipment are carried out on sealed surfaces so that any PFAS that may leak out does not get into the environment.
- [REDACTED] fire brigades are obliged to weigh up the risks to life and limb and the environment before the choice of the appropriate extinguishing agent is taken.
- Fire extinguishing water containing PFAS is recovered wherever possible and decontaminated and disposed of using the most modern methods. This also applies to extinguishing agent concentrate that can no longer be used.
- [REDACTED] has a concept for initial and follow-up measures if contaminated extinguishing water threatens to get into the soil and groundwater or into surface waters. Contaminated areas are included in the Bundeswehr's contaminated site program and permanently monitored.

Best regards
by order

[REDACTED]
[REDACTED]