

From: [REDACTED]
Sent: Thursday 8 June 2023 10:45
To: GROW F1
Subject: BTO: meeting with METI Japan on PFAS

Follow Up Flag: Follow up
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Categories: ARES, NT

Meeting with METI Japan 7/06/2023 10:30-11:45
Brussels, [REDACTED]

Participants

Japanese representatives: [REDACTED] Manufacturing Industries Bureau, Ministry of Economy, Trade and Industry (METI) Japan; [REDACTED] Trade, IPR & Industrial Policy, Mission of Japan to the EU
DG GROW: Kristin Schreiber, Director Chemicals, Food and Retail; [REDACTED]
REACH Unit: [REDACTED] REACH Unit

[REDACTED] explained that the Japanese *Chemical Substances Control Law* is jointly managed by METI (Chemical Management Policy Division), Environmental and Health Ministries. Two main agenda points were discussed.

1. Chemical Working Group of the EU-Japan Industrial Policy Dialogue

[REDACTED] explained that the Chair of the Chemical Management Policy Division will attend an OECD chemical meeting in Paris in February 2024 and asked GROW whether it would be possible to organise the 7th meeting of Chemical WG of EU-Japan Industrial Policy Dialogue in February as well.

Next steps:

GROW to check with the international unit when the next policy dialogue is planned and if there is flexibility on the date.

2. EU proposed restriction on PFAS

Ms Schreiber explained the process of the PFAS restriction and expressed appreciation for the cooperation with Japan. She noted that it will be important to consider uses where alternatives are not available for critical applications. COM will base its proposal on the ECHA opinions, but can also deviate from the recommendations of the Committees if well justified.

[REDACTED] presented a paper on **METI views on the EU PFAS restriction** proposed by five national authorities. This paper was also submitted during the ECHA consultation.

[REDACTED] highlighted the importance of a balanced approach for PFAS. The main message is that **Japan does not support the chosen group approach for PFAS**: PFAS should not be seen as a single group, and the different risk profiles should be assessed separately. It is not reasonable to treat PFAS as a single group as properties of each PFAS chemical are different. Their suggested approach is to ban higher risk PFAS and implement RMMs for lower risk PFAS. Fluoropolymers should be considered polymers of low concern.

explained the process of the restriction, highlighting the PFAS restriction is now assessed by ECHA Committees, and COM is an observer at this stage.

clarified the **Japanese action on PFAS**: they have implemented the Stockholm Convention on PFOA and PFOS, but they do not have additional bans on manufacturing of other PFAS substances. The Japanese Ministry of Environment is monitoring which PFAS are found in water wells and is working on RMMs, while NGOs in Japan are targeting the use of PFAS in firefighting foams.

Generally, the Japanese approach for other risky chemicals is a voluntary approach asking industry to reduce production and emissions, but if emissions do not decrease, then a mandatory approach is introduced.

also noted that many products containing PFAS are exported from Japan to the EU, and the **Japanese industry is calling for METI to raise the issue to WTO**.

Next steps:

Two possible opportunities to follow-up in person discussions on chemicals:

1. Ms Schreiber mission to Japan in October 2023 (TBC);
2. Meeting in February 2024.