

To: [REDACTED]@siemens.com
Cc: [REDACTED] (CLIMA)
Subject: FW: Recast of EU F-gas Regulation and PFAS

Dear Mr [REDACTED]s

Thank you for [your](#) mail regarding the PFAS. We are aware of the ongoing work related to PFAS by the competent authorities of some MS and our Commission colleagues as well as the type of concerns expressed by you. This issue is mostly dealt with in the context of REACH and since that work is ongoing, at this stage the F-gas team is not in a position to provide you with additional comments.

Best regards,



European Commission
Directorate-General for Climate Action

[REDACTED]
[REDACTED]
[REDACTED]

DISCLAIMER

"The views expressed are purely those of the writer and may not in any circumstances be regarded as stating an official position of the European Commission."

From: [REDACTED]@siemens.com>

Sent: Friday, August 13, 2021 12:24 PM

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Cc: [REDACTED] (CLIMA)

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Subject: Recast of EU F-gas Regulation and PFAS

Dear [REDACTED]

while Siemens AG continues to frequently put its particular challenging portfolio path on SF6-free medium-voltage electrical equipment on test, making MV switchgear products market available that completely avoid F-gases or other fluorinated substances as SF6 replacement, we came across the Communication "Chemicals Strategy for Sustainability Towards a Toxic-Free Environment" of the European Commission, Parliament, Council, Economic and Social Committee and the Committee of the Regions, dated Oct. 10, 2020 (COM(2020) 667 final). This Communication also addresses per- and polyfluoroalkyl substances (PFAS), saying that those substances "... require special attention ..." and it is aimed "... in particular, that the use of PFAS is phased out in the EU ..."

During our continued internal monitoring process of those PFAS substances as SF6 replacement in electrical applications, we now came across actual news concerning critical impact on environment and human beings caused by PFAS substances. This emphasizes the importance of the a.m. Communication and strongly supports the approach not replacing one fluorinated substance (SF6) by another (PFAS) in electrical equipment. The recast of the European F-gas regulation shall sensibly examine this latest findings.

<https://www.brusselstimes.com/news/belgium-all-news/173701/environmental-disaster-in-flanders-splits-the-coalition/>
<https://www.bloomberg.com/graphics/2018-3M-groundwater-pollution-problem/>

In addition, a restriction proposal to REACH Annex XV Restriction Dossier for the group of PFAS (per- and polyfluoroalkyl substances) is currently under preparation by the competent authorities for REACH of the Netherlands, Germany, Denmark, Sweden and Norway. This also underlines a downright critical view on PFAS, the use of which in large quantities as insulation medium in electrical equipment must not be promoted or accepted as essential use, especially since a wide range of fluorine gas-free alternatives is ready for the market by a number of suppliers.

<https://echa.europa.eu/nl/registry-of-restriction-intentions/-/dislist/details/0b0236e18663449b>
<https://link.webropolsurveys.com/Participation/Public/c4d58b80-5227-4f31-b656-92bc0669e41e?displayId=Ger2322406>

We will be happy to get your view on this critical issue.

With best regards,
[REDACTED]

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