

Kärkkäinen Pauli (Tukes)

Lähettäjä: Kärkkäinen Pauli (Tukes)
Lähetetty: torstai 23. marraskuuta 2023 7.23
Vastaanottaja: Daniel Laaber; Häkkinen Miia (Tukes)
Kopio: [REDACTED]@gov.fi
Aihe: VS: Meeting Request REACH PFAS Restriction Fluoropolymers and F-Gases (Chemours and Asahi Kasei)

Dear Daniel,

thank you for contacting us and apologies for the delayed response. We agree that up-to-date and use-specific information is indeed important for the process but as Miia already wrote, Tukes cannot affect to the proposal at this stage of the process. Furthermore, you mention that you hope that the information you provide would help the Finnish expert to support the request for a derogation. According to article 9 of the rules of procedure for the SEAC (https://echa.europa.eu/documents/10162/17091/seac_procedures_rules_en.pdf/), this kind of interaction is not considered appropriate as it could affect the independence of the expert working with the restriction proposal. Therefore, we do not consider that a meeting at this stage would bring added value and, therefore, politely decline for the request.

However, the decision-making process continues and the Finnish authorities will take a stance on the proposed restriction. Ministry of Social Affairs and Health is representing Finland in the REACH Committee. If considered necessary, you can contact ministerial adviser Ms. Hanna Korhonen (in copy to this email).

Best regards,

Pauli Kärkkäinen

Ryhmäpäällikkö, Teollisuus- ja kuluttajakemikaalit |
Head of Unit, Industrial and consumer chemicals

Turvallisuus- ja kemikaalivirasto (Tukes) |
Finnish Safety and Chemicals Agency
PL 66 (Opastinsilta 12 B), FI-00521 Helsinki, FINLAND
Puh. 029 5052 074 | Tel. [REDACTED]
pauli.karkkainen (at) tukes.fi

Lähettäjä: Daniel Laaber <[REDACTED]@eufocusgroup.com>

Lähetetty: maanantai 20. marraskuuta 2023 11.47

Vastaanottaja: Häkkinen Miia (Tukes) <[REDACTED]@tukes.fi>; Kärkkäinen Pauli (Tukes)

<[REDACTED]@tukes.fi>

Aihe: Re: Meeting Request REACH PFAS Restriction Fluoropolymers and F-Gases (Chemours and Asahi Kasei)

Dear Miia,

Thank you very much for the reconsideration. This is very much appreciated.

@Kärkkäinen Pauli (Tukes) - Please let me know if you have any questions. You can also reach me by phone if needed. M: +32 491 07 97 24

with best regards,

Daniel

From: Häkkinen Miia (Tukes) <[REDACTED]@tukes.fi>

Sent: Friday, November 17, 2023 2:52 PM

To: Daniel Laaber <[REDACTED]@eufocusgroup.com>

Cc: Kärkkäinen Pauli (Tukes) <[REDACTED]@tukes.fi>

Subject: VS: Meeting Request REACH PFAS Restriction Fluoropolymers and F-Gases (Chemours and Asahi Kasei)

Dear Daniel,

Thank you for your email.

I have forwarded your request to senior officer Pauli Kärkkäinen who will get back to you with a reply regarding the meeting request.

Have a nice weekend!

Ystävällisin terveisin / Med vänliga hälsningar / Kind regards

Miia Häkkinen

Koordinator av Nordisk arbetsgrupp för kemikalier, miljö och hälsa (NKE) /

Co-ordinator of the Nordic Working Group for Chemicals, Environment, and Health (NKE)

Turvallisuus- ja kemikaalivirasto (Tukes) / Säkerhets- och kemikalieverket (Tukes)
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[Turvallisuus- ja kemikaalivirasto \(Tukes\)](#) | [Turvallisuus- ja kemikaalivirasto \(Tukes\)](#)

[Nordic Working Group for Chemicals, Environment, and Health \(NKE\)](#) | [Nordic cooperation \(norden.org\)](#)

Lähetäjä: Daniel Laaber <[REDACTED]@eufocusgroup.com>

Lähetetty: torstai 16. marraskuuta 2023 15.45

Vastaanottaja: Häkkinen Miia (Tukes) <[REDACTED]@tukes.fi>

Kopio: Suomalainen Kati (Tukes) <[REDACTED]@tukes.fi>

Aihe: Re: Meeting Request REACH PFAS Restriction Fluoropolymers and F-Gases (Chemours and Asahi Kasei)

Dear Miia

Thank you for coming back. Please let me allow to clarify our request.

We are in regular contact with almost all competent Authorities in the member states and have had the opportunity to meet with most of them at least 1-2 times in the past 1.5 years on the PFAS Restriction.

We are not regularly in Helsinki, the reason why we only requested this meeting already last year in December for the same time and now this year.

We firmly believe that our contribution is helping the competent authorities to form their own informed opinion by providing the necessary information in a more interactive format.

Together with Chemours and Asahi Kasei we have already submitted during the Public Consultation process. The parallel direct exchange on these matters, and more recent developments was very much welcomed by the authorities as it is also an effective avenue to react to requests by the authorities.

We would be grateful if you could reconsider our suggestion to meet.

best regards,

Daniel

From: Häkkinen Miia (Tukes) <[REDACTED]@tukes.fi>

Sent: Wednesday, November 15, 2023 9:29 AM

To: Daniel Laaber <[REDACTED]@eufocusgroup.com>

Cc: Suomalainen Kati (Tukes) <[REDACTED]@tukes.fi>

Subject: VS: Meeting Request REACH PFAS Restriction Fluoropolymers and F-Gases (Chemours and Asahi Kasei)

Dear Daniel,

thank you for contacting the Finnish Safety and Chemicals Agency (Tukes) regarding the proposed restriction of per- and polyfluoroalkyl substances (PFASs).

We understand your concern and consider that stakeholder input and scientific data is important for the regulatory process and outcome. As Tukes cannot affect to the proposal at this stage of the process, we advise you to use the formal mechanism for consulting stakeholders in order to make the information available for all the relevant bodies in a timely and effective manner. To do this, you can contribute to the consultation for the SEAC draft opinion. Please follow the ECHA websites at <https://echa.europa.eu/fi/restrictions-under-consideration/-/substance-rev/72301/term> for further details and information about the deadlines.

Ystävällisin terveisin / Med vänliga hälsningar / Kind regards

Miia Häkkinen

Koordinator av Nordisk arbetsgrupp för kemikalier, miljö och hälsa (NKE) /

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[Nordic Working Group for Chemicals, Environment, and Health \(NKE\) | Nordic cooperation \(norden.org\)](#)

Lähettiläjä: Daniel Laaber <[REDACTED]@eufocusgroup.com>

Lähetetty: maanantai 13. marraskuuta 2023 13.45

Vastaanottaja: Suomalainen Kati (Tukes) <[REDACTED]@tukes.fi>; Häkkinen Miia (Tukes) <[REDACTED]@tukes.fi>

Kopio: Pascal Michaux <[REDACTED]@eufocusgroup.com>; Pavel Glukhov <[REDACTED]@eufocusgroup.com>

Aihe: Re: Meeting Request REACH PFAS Restriction Fluoropolymers and F-Gases (Chemours and Asahi Kasei)

Dear Kati,

Dear Miia,

We hope you are doing well. We would like to request a meeting with you and other REACH experts involved to informally discuss two dossiers affected by the ongoing REACH PFAS Restriction. Since we will be already in Helsinki on December 7, we would appreciate the possibility of meeting in person on the same day or ± 1 day.

The proposed agenda is as follows:

PVDF (a fluoropolymer) for virus removal filters in biopharmaceuticals (ASAHI KASEI)

- A Japanese company, Asahi Kasei is one of global leaders in chemical solutions to the pharma industry;
- PVDF has unique application in the filtering of viruses when manufacturing biopharmaceuticals in Europe;
- The objectives is to explain the application, and why there are no alternatives for this minor, yet critical application for which we hope the Finish experts would support a derogation request.

Fluoropolymers & F-Gases (CHEMOURS)

- Chemours, a US company with strong manufacturing presence in the EU, is the global leader in the manufacturing of fluoropolymers & F-Gases, both falling in scope of the PFAS restriction.
- The objective is to provide you now with a high-level summary of Chemours' RAC/SEAC submission.
- Both enable the EU 'Green Deal' transition through various applications in semiconductors, hydrogen economy, medical devices and air-conditioning systems.

with best regards,

Daniel

Daniel Laaber

Regulatory & Policy Adviser

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