

Helsinki, 25 June 2024

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Sent by email only: [REDACTED]@solvay.com

Subject: Response to your letter of 20 May 2024 proposing a smoother process for stakeholder contribution to the U-PFAS restriction proposal

Dear [REDACTED],

Thank you for your letter on 20 May 2024 proposing some measures to facilitate stakeholder contributions to the U-PFAS restriction proposal. We appreciate your input, including your reflections on the challenges faced by stakeholders in contributing to the work of the Committees and your suggestions for improvement.

The ECHA Committees consider that stakeholders provide valuable input to their proceedings and are therefore committed to involving stakeholders in their activities. In this context, we appreciate your proposals for improvement and will consider them to the extent possible.

Please see below our reflections on your specific suggestions regarding the Committees' work.

- **Distribution of Committees' documents:**

Your suggestion: *"Please consider uploading Committee's documents to be assessed by the accredited stakeholders (regular and occasional) at least one week before the Committees' meeting, in particular the draft opinions and the revised versions of the Background Document".*

According to the Committees' rules of procedure, the meeting documents for the plenary discussions are made available to the meeting participants at least 10 calendar days in advance of the meetings. This practice has been followed for the meeting documents on the U-PFAS restriction proposal (draft opinions and Background Documents) which have been uploaded 10 calendar days before the plenaries. Presentations are not considered meeting documents; therefore, their upload is done as soon as they are ready. Please note that experts accompanying stakeholders do not have access to the meeting documents and it is the accredited stakeholder's responsibility to ensure they are provided with the necessary documentation.

- **Minutes of the Committee meetings**

Your suggestion: *"Please consider the possibility of drafting more detailed minutes describing key concepts and decisions proposed by the Committees".*

The minutes are a brief reflection of the committees' discussions but cannot describe the full content of the topic and conclusions for practical reasons. A brief summary of each agenda point is provided in the minutes, including any relevant action point.

- **Access to the Background Document**

Your suggestion: *"An early access to the BD revised versions will enable stakeholders to understand the development of the assessment of the uses, the remaining data gaps and to optimally prepare for the SEAC draft opinion consultation"*.

The BD revised versions reflect the changes to the restriction proposal introduced by the Dossier Submitter as they progress with their assessment of the comments from the consultation. We take note of your suggestion and will consider the best options for making the revised version of the BD available well in advance of the launch of the SEAC draft opinion consultation.

- **Access to the Responses to the Comments to the Consultation (RCOM)**

Your suggestion: *"Please consider publishing the RCOM specific to the uses to be discussed in the plenary in advance of the Committee discussions"*.

The RCOM is being developed by the Dossier Submitter and by the rapporteurs and it is not yet ready to be shared with the committees and stakeholders. The BD revised versions and the draft opinions which are made available before the Committees plenary discussions reflect the comments considered relevant and taken into account by the Dossier Submitter and the rapporteurs in their respective assessment.

- **Information on alternatives**

Your suggestion: *"Please consider providing information on the criteria used to assess alternatives"*.

During the opinion development process, the Committees evaluate the restriction proposal developed by the Dossier Submitter. The criteria used by the Dossier Submitter to assess the availability of alternatives are defined in the restriction proposal while the evaluation criteria agreed by RAC and SEAC are defined in the SEAC draft opinion and discussed at the Committees plenary meetings. Please refer to these documents for further insight into the assessment of alternatives by the Committees.

- **Regular public updates**

Your suggestion: *"Please consider providing additional updates on the restriction proposal including info sessions with Q&A or a standing column on PFAS in the ECHA newsletter"*.

We provide regular news updates on the UPFAS restriction opinion-development on the ECHA website, and we intend to publish Q&As to clarify topics that come up regularly as questions from stakeholders. Info sessions are not currently foreseen and may be considered in the future.

- **Onboarding sessions for new stakeholders**

Your suggestion: *"Please consider practical onboarding session for newcomers"*.

ECHA provides onboarding sessions for new stakeholders regularly. Since the start of the UPFAS restriction opinion-development, two sessions have taken place where 10 to 15 new stakeholders have participated. Although some practical issues are discussed in these meetings, further hands-on training could be beneficial to ensure a smooth access to meeting documents by all stakeholders. We take note of your suggestions and will consider how to address them in the next onboarding sessions.

I want to reiterate my thanks to you and your team for your suggestions and commitment to improve the stakeholders' contribution to the ECHA Committees' work.

Your sincerely,

*[e-signed]*¹

[Redacted Signature]

Director of Risk Management

Cc: [Redacted], Cefic
[Redacted], Cefic
[Redacted], Cefic
[Redacted], Cefic

¹ As this is an electronic document, it is not physically signed. This communication has been approved according to ECHA's internal decision approval process.