

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Bcc: [REDACTED]
Subject: RE: PFAS in AFFF: specific questions
Date: 16 February 2021 16:02:00
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Dear [REDACTED]

Thank you for your thoughts. I agree that training and testing account for the biggest part of the use and, even if now claimed to be collected, if they are directed to the WWTP it means almost 100% release to the environment due to absence of degradation. From the information we have it seems that restricting these uses within a few years' time would not be a major problem as many users have made the transition already for these uses.

I remember indeed [REDACTED] proposal. This is something we can explore further but remains to be seen to which extent this would be feasible in practice since I understand fixed foam delivery systems are designed according to the specificities of the sites and not easily adaptable. However, these centralised stocks could be used to fill up the companies' reduced stocks when needed and deliver the mobile intervention units.

Regarding the PFHxA restriction vs ECHA's, we are trying for the latter to refine the assessment made by Wood based on the comments received during the PFHxA opinion-making process and with additional data collection to hopefully get a more accurate picture. This, however, might lead to delays in preparing the restriction since the initial idea was to use Wood's dossier with limited further elaboration.

Happy to discuss further,

Best regards,

[REDACTED]

From: [REDACTED] <[REDACTED]>

Sent: 16 February 2021 12:58

To: [REDACTED] <[REDACTED]>

Cc: [REDACTED] <[REDACTED]> [REDACTED]

<[REDACTED]> [REDACTED] <[REDACTED]>

Subject: RE: PFAS in AFFF: specific questions

Thanks [REDACTED] for this very comprehensive set of questions. I think it is important to have the numbers right on the use of foams. I do agree that the volumes used in fires might be low, but those used in testing and training can be high. These were the sources of most of contamination cases from fire-fighting foams in the past (especially PFOS, which was used for training after the ban). I do not know how much we can trust the claims that foams are collected and treated in the appropriate ways after testing and training.

Also in view of the discussion on Seveso plants, an interesting proposal that came from [REDACTED] during the workshop in Helsinki was to keep stock of PFAS foams in specific areas of large petrochemical sites, to be used in case of emergency. This could be an option to be considered for the transitional period, maybe linked to some permitting scheme (similar to what was considered for lead in ammunitions and training fields for international competitions).

Then there is an important discussion we need to have, especially here in the Commission: if most of AFFFs foams currently used are in the scope of the PFHxA restriction, what do we do with that proposal, once it reaches us? Move ahead or wait for a more specific and well-thought proposal for fire-fighting foams from the ECHA dossier?

Kind regards

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: Monday, February 15, 2021 10:55 AM
To: [REDACTED] (ENV) <[REDACTED]> [REDACTED]
(ECHA) <[REDACTED]>
Cc: [REDACTED] (ECHA) <[REDACTED]> [REDACTED] (ECHA)
<[REDACTED]>
Subject: FW: PFAS in AFFF: specific questions

Dear [REDACTED] and [REDACTED]

FYI, following our call with Eurofeu two weeks ago we sent them on Friday the attached list of questions, gathering the questions I had and the ones from Ramboll, in relation with the contracts we have with them to clarify some elements. Let's see if Eurofeu will be able to respond to these questions with good and representative data and by when. This delays our work on the ECHA proposal since we will have to wait for the data but hopefully this will consolidate the basis of the proposal.

I will keep you updated and I will probably suggest a call with Eurofeu around end of March to check where they are.

Best regards,

[REDACTED]

From: [REDACTED] <[REDACTED]>
Sent: 12 February 2021 16:41
To: [REDACTED] [REDACTED] <[REDACTED]> Eurofeu <[REDACTED]>
Cc: [REDACTED] <[REDACTED]> ECHA Restriction PFAS in firefighting
foams <[REDACTED]> [REDACTED]
<[REDACTED]> [REDACTED] <[REDACTED]>
Subject: PFAS in AFFF: specific questions

Dear [REDACTED] [REDACTED]

As agreed during our call, please find in attachment a list of questions from us and our consultant Ramboll on which we would appreciate feedback, where possible. As there are many questions and that some might require more time to answer than others, you can send your responses in separate batches, using the same web form referred to in the letter.

If you have any question, do not hesitate to contact us.

Thank you for your collaboration,

Best regards,

[REDACTED]

Scientific officer

Risk Management Unit II

European Chemicals Agency

PO Box 400 / Telakkakatu 6

00121 HELSINKI, Finland

Tel: [REDACTED]

Mob: [REDACTED]

<http://echa.europa.eu/>



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