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Questions and answers from the PFAS session at ECHA Safer Chemicals Conference, 6 October 2021

Question	Response
What about large tanks?	The LASTFIRE project has been conducting tests of firefighting foams on large oil tanks for several years and is going to do more on fluorine-free foams. See www.lastfire.co.uk/
I do not know if there is real empirical evidence of effective extinction of the FFF.	Fluorine-free foams have already been used in several sectors, however further testing might be needed for some sectors/fire scenarios to ascertain effectiveness. Sector-specific transitional periods will be proposed to take this aspect into account.
Who asked ECHA to look at the FFF independently ?	The European Commission requested ECHA to prepare a restriction proposal for all PFAS in fire-fighting foams. Here
Very broad restrictions in general, including the one discussed today, is obviously a challenge to enforcement, and not only in respect of testing from a number of matrices. How will this be overcome?	The practicality, including enforcability, of a restriction is one of the criteria that is assessed before implementation. However, a simple scope allows relatively simple analytical methods e.g. TOF
Where can we find the analysis of the SEAC, & RAC?	Once RAC and SEAC develop the opinions they will be published on the ECHA website. They will take about 12 months after submission to prepare. https://www.echa.europa.eu/web/guest/registry-of-restriction-intentions/-/dislist/details/0b0236e1856e8ce6
How challenging is it for ECHA to make sure the various ongoing and planned risk management work does not interfere but rather support each other?	The various different initiatives introduce some complexity, but we have effective working relationships with the different actors to mitigate this. Potentially regulating as a group will simplify this.
How do you envision industry, regulators and enforcement authorities to manage generic restrictions not being able to clearly identify substances as discrete	ECHA has published indicative lists of affected CAS to support the implementation of generic restrictions. However, CAS numbers are not always the best way to define the scope of restrictions.

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information like CAS Nos are missing?	
Does the firefighting foams cover all types in vessels, airplane, vehicles?	Yes. The scope covers all use settings
Big data and the digital transformation can only be used in full extend if discrete information on substance ID including CAS nos is available.	The proposal will have a clear scope based on chemical structure. This will allow stakeholders to know if they are affected (as long as they know the structure of their chemicals).