

UPFAS restriction proposal: Process update

FPP4EU Collaboration Platform

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Bastian Zeiger

Regulatory Officer – Risk Management Unit I
European Chemicals Agency



Overview



Objectives of opinion-making



State of play and next steps

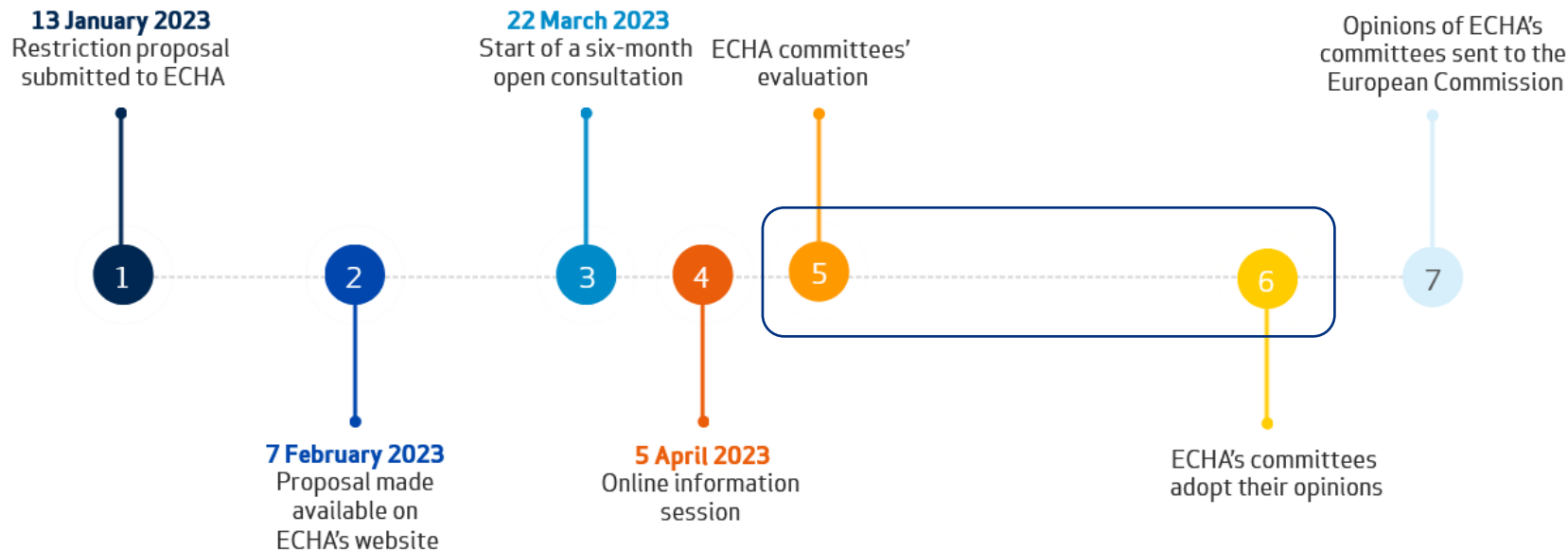


Input of stakeholders

Objectives of opinion-making

- Committees evaluate the restriction proposal by the MSs
- Commission is the decision-maker (together with Member States)
- RAC/SEAC evaluation focuses on 'justification for a restriction' and the 'scope and conditions of the restriction'
 - Assessment by the Dossier Submitter in restriction report
 - Comments by interested parties in the consultations

Restriction process – UPFAS restriction proposal



Committees' evaluation – thus far

→ **March – June 2023**

- Conformity check
- Key issues and recommendations

→ **September 2023 - December 2023**

- Discussion of first draft opinions:
 - Scope and hazards (RAC)
 - Food contact materials and packaging
- Overview of comments

→ **March 2024**

- Hazards (cont) (RAC)
- General approach (SEAC)
- Consumer mixtures
- Cosmetics
- Ski wax

Committees' evaluation – RAC 69/SEAC 63

→ **June 2024**

- Hazards (cont)
- Emissions (waste stage) (RAC)
- General approach (cont) (SEAC)
- Consumer mixtures (cont)
- Cosmetics (cont)
- Ski wax (cont)
- Metal plating and manufacture of metal products

Committees' evaluation – next steps (tentative)

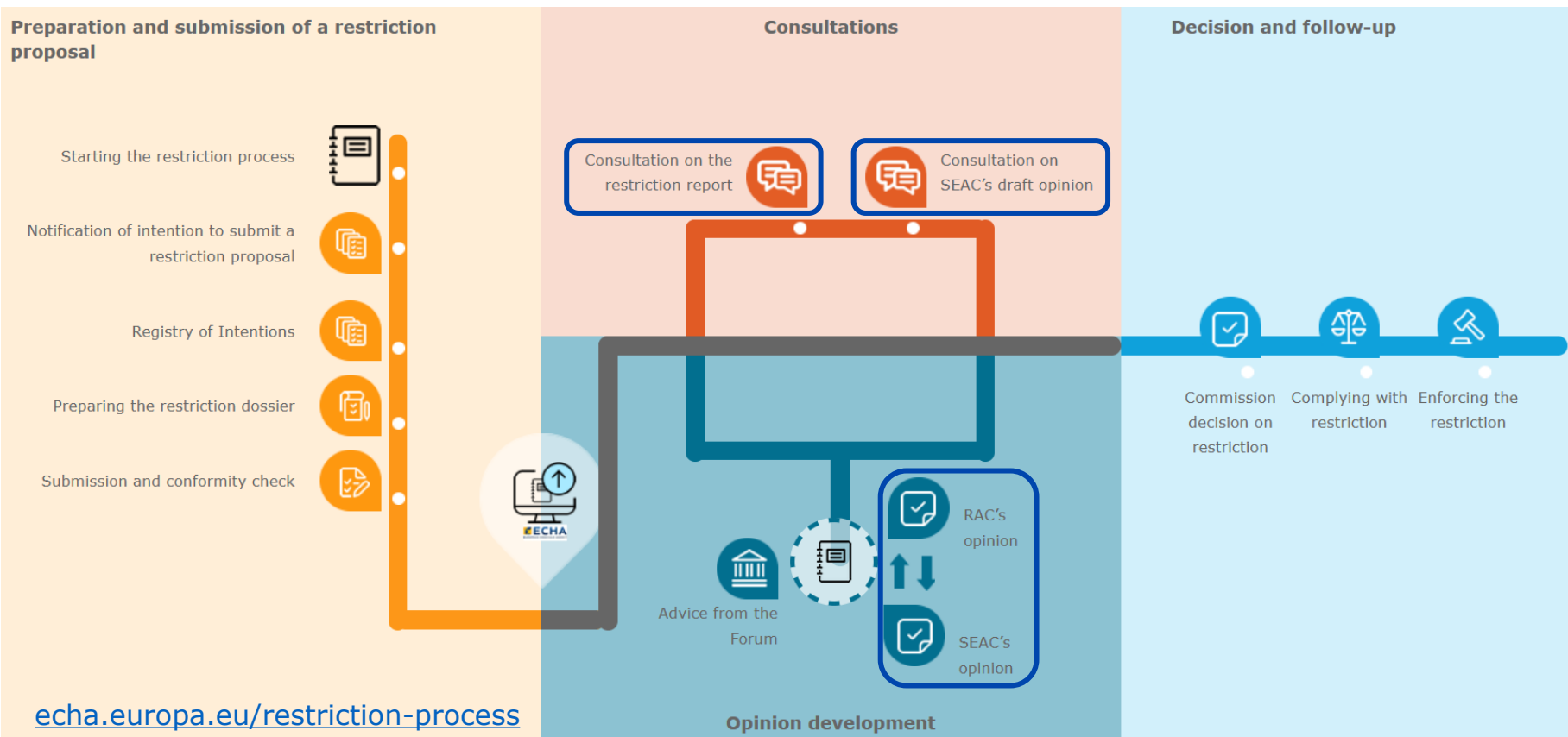
→ **September 2024**

- Textiles, upholstery, leather, apparel, carpets (TULAC)
- Food contact materials and packaging
- Petroleum and mining

→ **Next sectors**

- Fluorinated gases
- Transport
- Construction products

Input of stakeholders – When?



Input of stakeholders – When?

Consultations

→ **Restriction report:** 6-month consultation (finished on 25 September 2023, over 5600 comments received)



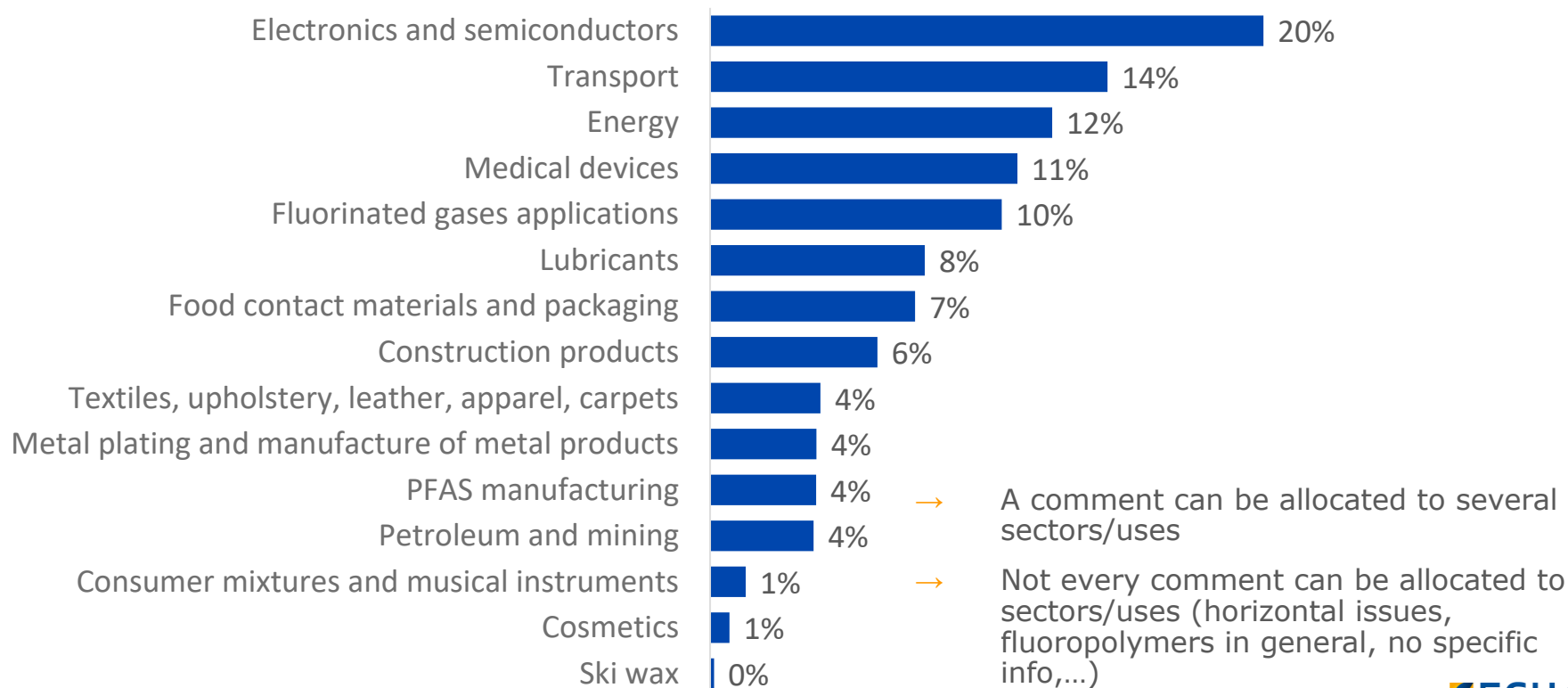
triggered update of the restriction proposal by the Dossier Submitter (Background Document)

→ **SEAC draft opinion:** 2-month consultation



may trigger an update of the SEAC opinion (SEAC final opinion)

Share of comments by sector as per the Annex XV report (based on initial analysis of all comments)



Input of stakeholders – How?

Consultations

- Detailed information should be submitted through consultations
- Non-confidential submissions will be published – RAC/SEAC members also have access to confidential submissions
- Submissions are evaluated by Dossier Submitter, RAC and SEAC (for consultation on SEAC DO: SEAC only) – responses will be published at the end of the process

Input of stakeholders – What?

Make impactful consultation submissions

- Provide supporting information and evidence – if documents are attached be clear why these are important
- Requests for derogations or longer transition periods must demonstrate that the impacts of the proposal would be disproportionate – be realistic and as specific as possible
- Answer specific questions that have been asked
- Make joint submissions (e.g. by sector) – the representativeness of the information is relevant
- Structure submissions clearly – provide a summary section, use bullet points for key issues, prioritise issues, avoid jargon

RAC/SEAC meetings

- Limited number of stakeholders can be admitted
- Registration opens in advance of each meeting, Chairs will consider amongst all registered
- Further info on committees' procedures:
echa.europa.eu/about-us/who-we-are/committee-for-risk-assessment
echa.europa.eu/about-us/who-we-are/committee-for-socio-economic-analysis

Further information

- ECHA's PFAS hot topics page: [Per- and polyfluoroalkyl substances \(PFAS\) - ECHA \(europa.eu\)](#)
- UPFAS registry of intentions (ROI) until outcome entry: [Registry of restriction intentions until outcome - ECHA \(europa.eu\)](#)

Conclusions



Evaluation of the restriction proposal is ongoing by ECHA's Committees



European Commission takes the decision together with MS



Stakeholder inputs are important – clear submissions to consultations are key

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