

Helsinki, 16 February 2023
RAC/64/2023/02

64TH MEETING OF THE COMMITTEE FOR RISK ASSESSMENT

Concerns: Report from the February Restriction WG

Agenda Point: 9.1.1.

Action requested: For information

RAC WG/REST/R/8/2023

16 February 2023

RAC/64/2023/02

**Report
of the Meeting of the Committee for Risk Assessment
Restrictions Working Group (RAC REST WG)
reporting to RAC-64**

**ECHA Conference Centre
(Telakkakatu 6, Helsinki)
via Webex**

**Tuesday 14 February 2023 at 10:00
to
Thursday 16 February 2023 at 16:30**

Summary Record of the Proceedings

1. Welcome and apologies

The Chair of RAC, Tim Bowmer, welcomed the participants of the 8th meeting of the RAC Working Group on restrictions. He noted that Johanna Peltola-Thies, Deputy Chair of RAC, Mercedes Marquez-Camacho, Christiaan Logtmeijer, and Piotr Sosnowski would chair sections of the meeting and informed the group that consultations had been organised on the six restriction opinions prior to the meeting.

2. Adoption of the Agenda

The Chair reviewed the agenda for the meeting (RAC WG/A/REST64/2023), which was adopted without amendments and is attached to this Report as Annex I.

3. Declarations of conflicts of interests to the Agenda

The Chair requested all participants to declare any potential conflicts of interest to any of the agenda items. Five participants of the meeting declared a potential conflict

of interest on cases scheduled for the discussion as presented in Annex III to this Report. The six WG Chairs, all declared that they had no potential interests related to any of the agenda points for the meeting.

4. Restriction proposals

1. PFASs in firefighting foams – third draft opinion	
<p>The WG Chair Mercedes Marquez-Camacho introduced herself and welcomed the Dossier Submitter's representatives from ECHA and their invited experts. The WG Chair also welcomed the regular stakeholders from CropLife Europe, Cefic and EEB including their accompanying experts. She further welcomed the occasional stakeholder from Eurofeu and their accompanying expert. She informed the participants that the restriction dossier had been submitted in January 2022 and concerns PFAS in firefighting foams.</p>	
<p>No further discussion recommended</p> <p><i>The WG discussed and recommended that the following could be agreed without further discussion at RAC-64:</i></p> <p><u>Hazard assessment:</u></p> <ul style="list-style-type: none"> • that currently available evidence is not sufficient to conclude on the non-persistence of specific subgroups of PFAS. • that should fully substantiated evidence arise, non-persistent PFAS could be excluded from the scope of the restriction. <p><u>Effectiveness to reduce risk:</u></p> <ul style="list-style-type: none"> • that RO3* is the most effective restriction option. • that RAC supports the ban on placing on the market of new portable fire extinguishers from 6-months after Eif as introduced by the Dossier Submitter. • that RAC supports the removal of requiring additional RMMs for portable 	<p>RAC members to provide the remaining written comments on the second draft opinion by 16 February 2023 via the written commenting round.</p> <p>Rapporteurs to prepare the revised 3rd draft opinion by 24 February 2023 for adoption at RAC-64 taking into account the WG discussions.</p> <p>Rapporteurs to prepare a short presentation to RAC-64 to report back.</p> <p>SECR to table the revised 3rd draft opinion for adoption at RAC-64.</p>

* RO3: Restriction on the formulation, placing on the market and use after use/sector-specific transitional periods

fire extinguishers via changes to paragraph 4.

- That RAC agrees on replacing 'sewage treatment' by 'waste water treatment' and deleting 'irrespective of any pre-treatment' in the conditions regarding para 4(d).

Practicality:

- that RAC recommends the provision of guidance regarding analytical methods, foam management plans and cleaning of equipment including handling of resulting waste.
- that RAC does not support the increase of the concentration limit to 50ppm for PFAS-containing foams for the offshore sector as proposed by SEAC.

Monitorability:

- that monitorability can be done through enforcement, similarly to the present monitoring compliance of regulations on PFOA and other long-chain PFAS.
- that targeted inspection activities can focus on PFAS-containing firefighting foam management plans and proper labelling of PFAS-foam stocks as well as waste resulting from the use of such foams.
- that time-trend monitoring does not allow monitoring of the effectiveness of the proposed restriction in reducing the identified risks.

Additional discussion recommended

The WG discussed and recommended that RAC-64 further discuss the following:

Effectiveness to reduce risk:

- a RAC condition regarding para 4(d) and 5 that further defines the conditions of adequate treatment.
- a RAC condition regarding para 4(d) that ensures adequate treatment of cleaning waste is in scope of adequate

<p>disposal conditions during the transitional periods.</p> <ul style="list-style-type: none"> • that a return and reuse scheme is suggested in the opinion as a possible good practice <p><u>Practicality:</u></p> <ul style="list-style-type: none"> • the concentration limit in paragraph 4(d) and 6 triggering the requirement for adequate treatment and labelling of PFAS-containing waste <p><u>Monitorability:</u></p> <ul style="list-style-type: none"> • that additional reporting requirements for formulators are suggested to enhance the monitorability of the proposal - the Commission's view to be sought on this. 	
<p>The regular stakeholder observer from CropLife Europe and the accompanying expert to the regular stakeholder observer from EEB commented on the hazard assessment. The Dossier Submitter provided clarifications regarding the hazard assessment and effectiveness. The occasional stakeholder observer from Eurofeu and their accompanying expert and the accompanying expert to the regular stakeholder observer from EEB commented on effectiveness. The invited expert from WFVD commented on practicability. The accompanying expert to the regular stakeholder observer from EEB commented on monitorability.</p>	
<p>2. DMAC/NEP – third draft opinion</p>	
<p>The RAC Chair Tim Bowmer welcomed the Dossier Submitter's representative from the Netherlands. He also welcomed the regular CEFIC stakeholder including their accompanying expert. The chair informed the participants that the restriction dossier had been submitted in April 2022 and concerns occupational exposure to DMAC and NEP and proposes harmonised DNELs for workers</p>	
<p>No further discussion recommended <i>The WG discussed and recommended that the following could be agreed without further discussion at RAC-64:</i></p> <p><u>Exposure:</u></p> <ul style="list-style-type: none"> - that the new exposure data received from the DS on DMAC and NEP is helpful to reduce the uncertainties in the exposure assessment, particularly for NEP but is still lacking contextual information. -that RACs overall conclusions regarding exposure remain unchanged in this regard. 	<p>RAC members to provide the remaining written comments on the second draft opinion by 16 February 2023 via the written commenting round.</p> <p>Rapporteurs to prepare the revised 3rd draft opinion by 24 February 2023 for adoption at RAC-64 with the following editorial changes:</p> <ul style="list-style-type: none"> - Uncertainties based on lack of data may not result in overestimation.

<p><u>Effectiveness:</u></p> <ul style="list-style-type: none"> - that the proposed restriction is effective in reducing the identified risks. <p><u>Practicality:</u></p> <ul style="list-style-type: none"> - that the proposed restriction is practicable and enforceable. - that the NMP Guidance needs to be updated to cover restricted aprotic solvents in general. <p><u>Monitorability:</u></p> <ul style="list-style-type: none"> - that the proposed restriction is monitorable. <p><u>Most appropriate EU-wide measure:</u></p> <ul style="list-style-type: none"> - that the proposed restriction is the most appropriate EU-wide measure. - to recommend to the European Commission that the BOELV for DMAC could be updated and a BOELV for NEP could be set to ensure harmonisation between legislations. <p><u>Uncertainties:</u></p> <ul style="list-style-type: none"> - that uncertainties tend to lead to an overestimation of risks and human health impacts. - that uncertainties do not prevent RAC from concluding that there are risks that need to be controlled. <p><u>Opinion of RAC:</u></p> <ul style="list-style-type: none"> - RAC WG agreed on the changes in restriction conditions developed by the rapporteurs. The scope of the restriction remains unchanged. 	<p>Rapporteurs to prepare a short presentation to summarise the case for RAC-64 and to report back.</p> <p>SECR to table the revised 3rd draft opinion for adoption at RAC-64.</p>
<p>The expert accompanying the regular stakeholder observer from CEFIC commented on the exposure assessment and practicality.</p>	
<p>Terphenyl, hydrogenated – third draft opinion</p>	
<p>The Chair Johanna Peltola-Thies welcomed the Dossier Submitter's representatives from Italy, the regular stakeholders. She informed the participants that the restriction dossier had been submitted in April 2022 and concerns the restriction of</p>	

<p>the placing on the market and the use of terphenyl, hydrogenated.</p>	
<p>No further discussion recommended</p> <p><i>The WG discussed and recommended that the following could be agreed without further discussion at RAC-64:</i></p> <ul style="list-style-type: none"> • The release estimates of the updated background document are still not robust. • The WG agreed on the outcome of the qualitative assessment performed by the rapporteurs. • The proposed restriction with some modifications is the most appropriate EU-wide measure. • The proposed restriction with some modifications is effective in minimising the risk. • A time limited derogation on the use as a heat transfer fluid in industrial installations is supported, provided that strictly controlled closed systems are implemented and the requirement to implement a representative monitoring program is foreseen as part of the restriction. • The restriction is generally practicable, enforceable and monitorable. Further development of the analytical methods is recommended. • The WG recommends to scrutinize the need for further regulatory measures on o-terphenyl, terphenyls in general and the functional group identified by the Finnish authorities. • The overall uncertainties are relevant but would not affect the overall conclusions on the effectiveness, practicality and the monitorability of the proposed restriction. <p>Additional discussion recommended</p>	<p>RAC members to provide written comments on the third draft opinion by 21 February 2023.</p> <p>Rapporteurs to prepare the revised 3rd draft opinion by 24 February for adoption at RAC-64 based on the discussion in the WG and the comments received during the RAC consultation.</p> <p>Rapporteurs to prepare a presentation to RAC-64 for the points for discussion and to report back from the WG.</p> <p>SECR to clarify in what form the conditions accompanying the derogation on heat transfer fluid uses in industrial installations can be best addressed in the proposed entry.</p> <p>SECR to provide more information on the (potential) presence of terphenyl, hydrogenated in other substances.</p> <p>SECR to table the revised 3rd draft opinion for adoption at RAC-64.</p>

<p><i>The WG discussed and recommended that RAC-64 further discuss the following:</i></p> <ul style="list-style-type: none"> • The derogation proposed for aerospace and defence applications • The derogation on heat transfer fluid use in thermostats in ovens proposed by the DS <p>Discussion on the risks of alternatives at RAC-64 (not discussed in the WG)</p> <p>Recommendation to adopt <i>The WG recommended that RAC-64 could adopt the opinion, after discussion of the outstanding points and with the details discussed at the RAC-64 REST WG.</i></p>	
<p>No interventions made by the stakeholder observers and no experts were present for this item.</p>	
<p>4. Chloroalkanes, C14-C17 (MCCP) – second draft opinion</p>	
<p>The WG Chair Christiaan Logtmeijer welcomed the Dossier Submitter's representatives from ECHA and the regular stakeholders, including the accompanying expert to the regular CEFIC stakeholder and the occasional stakeholder observer from EUPC.</p> <p>The participants were informed that the restriction dossier had been submitted in July 2022 and concerns the manufacture, use and placing on the market of substances, mixtures and articles containing medium-chain chlorinated paraffins (MCCP) as well as other substances that contain chloroalkanes with carbon chain lengths within the range from C14 to C17 with PBT- and/or vPvB-properties.</p>	
<p>No further discussion recommended <i>The WG discussed and recommended that the following could be agreed without further discussion at RAC-64:</i></p> <p><u>Need for EU wide action</u></p> <p>- Any necessary action to address the identified risks should be implemented at an EU wide level.</p> <p><u>Risks of alternatives</u></p> <p>-Some available alternatives seem to have a better hazard profile than the substances to be restricted, from a human health and an environmental perspective.</p> <p>-The Dossier Submitter's assessment of risks of alternatives, based on their human health and environmental concerns, poses no major</p>	<p>RAC members to provide the remaining written comments on the first draft opinion by 20 February 2023.</p> <p>Rapporteurs to prepare a short presentation to RAC-64 to report back.</p> <p>Rapporteurs to take the WG discussions (the outcome of the third party consultation and RAC written comments received) into account for the next version of the opinion by April 2023 prior to the May RAC-65 Working Group on restrictions.</p>

<p>shortcomings or uncertainties related to the methodology used.</p> <p><u>Most appropriate EU wide measure</u></p> <p>-The proposed restriction is the most appropriate risk management measure for 'CA:C14-17 with PBT and/or vPvB properties'.</p> <p>-The 'other vP congeners' may present similar risks as the congeners having PBT and/or vPvB properties and are present as constituents in the same substances as 'CA:C14-17 with PBT and/or vPvB properties', thus the restriction measures should consider all congeners of concern.</p> <p>-The restriction is targeted to the effects or exposures that cause the risks identified, capable of reducing these risks within a reasonable period of time and proportional to the risk posed by CA:C14-17 in substances, mixtures and articles.</p> <p>-The restriction is in general implementable, enforceable, practical and manageable. It is also monitorable.</p> <p>Further work required The WG recommended that rapporteurs continue their work on these elements and present the next version of the opinion at RAC-65 REST WG:</p> <p style="padding-left: 40px;">→ Uncertainties</p> <p>Consider comments/inputs from the third party consultation and the discussions at the RAC-64 REST WG.</p>	<p>Secretariat to table this item for discussion at RAC-65 WG in May 2023.</p> <p>Stakeholders to submit additional information via the third-party consultation on the Annex XV dossier.</p>
<p>The expert accompanying the regular CEFIC stakeholder observer commented on the interlink between the different risk management regulations (i.e. POPs, RoHS and REACH restriction), on the presence of CA:C14-C17 congeners in commercial substances, on challenges in supply chains for imported articles and shared concerns over the amount of laboratory capacity for analysis of significant levels of article imports. The occasional stakeholder EUPC commented on the guidance related to concentration limits in articles and on challenges related to recycling. The</p>	

Secretariat encouraged stakeholders to submit additional information via the third party consultation.

5. BPA+ first draft opinion

The WG Chair Piotr Sosnowski welcomed the Dossier Submitter's representatives from Germany and the occasional stakeholders from EDANA and EUPC and the regular stakeholders, including the accompanying experts to the regular (CEFIC, PlasticsEurope) stakeholders.

The participants were informed that the restriction dossier had been submitted in October 2022 and relates to the placing on the market of mixtures and articles where the concentration is equal to or greater than 10 ppm (0.001 % by weight) with several derogations.

No further discussion recommended

The WG discussed and recommended that the following could be agreed without further discussion at RAC-64:

Scope of the risk assessment:

- The scope of the risk assessment is clear and is justified in sufficient detail.

Hazard(s):

- The description of the identified hazards is adequate for the BPA, BPB, BPS, BPF, BPAF and the 8 salts of BPAF.
- BPA, BPB and BPS are identified as SVHC for ED ENV and MSC recently issued positive opinions on BPF, BPAF and eight salts of BPAF.
- The current state of knowledge of the endocrine disrupting properties of these bisphenols, mode(s) of action and effects in the environment is insufficient to determine a threshold.
- This conclusion would reasonably apply to all bisphenols that in the future will be identified as having endocrine disrupting properties for the environment.

This is based on the information in the current Background Document.

RAC members to provide the remaining written comments on the first draft opinion by 17 February 2023.

Rapporteurs to prepare a short presentation to RAC-64 to report back.

Dossier Submitter to provide information on assumptions, and calculations on emission estimates by 17 March 2023

Rapporteurs to take the WG discussions (and RAC written comments received) into account for the next version of the opinion by April 2023 prior to the May RAC-65 Working Group on restrictions.

Secretariat to table this item for discussion at RAC-65 WG in May 2023.

Stakeholders to submit additional information via the third-party consultation on the Annex XV dossier.

<p>Risk characterisation</p> <ul style="list-style-type: none"> → Emissions of Bisphenols with endocrine disrupting properties for the environment and their salts are a suitable proxy of risk to the environment. <p>This is based on the information in the current Background Document. The conclusion is subject to further scrutiny of the additional information provided via the third party consultation.</p> <p>Further work required</p> <p><i>The WG recommended that rapporteurs continue their work on the following elements and present the next version of the opinion at RAC-65 REST WG:</i></p> <ul style="list-style-type: none"> → Emission estimates → The provisional conclusion on lack of an ED threshold above is subject to further scrutiny of the additional information provided via the third party consultation. 	
<p>The experts accompanying the regular CEFIC and PlasticsEurope stakeholder observers commented on the scope, emission estimates and the feasibility to determine an ED threshold. The occasional stakeholder representative from EUPC commented on emission estimates and on derogations. The experts accompanying the regular EEB and Eurometaux commented on release and emission estimates.</p>	
<p style="text-align: center;">6. Creosote, and creosote related substances – first draft opinion</p>	
<p>The WG Chair Piotr Sosnowski welcomed the Dossier Submitter's representatives from France and the regular stakeholders, including the accompanying expert to the regular CEFIC stakeholder.</p> <p>The participants were informed that the restriction dossier had been submitted in October 2022 and concerns on the placing on the market, re-use and secondary use of wood treated with creosote or related substances.</p>	
<p>No further discussion recommended</p> <p><i>The WG discussed and recommended that the following could be agreed without further discussion at RAC-64:</i></p> <p>The scope of the substances is provisionally agreed.</p>	<p>RAC members to provide the remaining written comments on the first draft opinion by 17 February 2023.</p>

<p>Scope of the <u>risk assessment</u>:</p> <ul style="list-style-type: none"> The scope of the risk assessment is clear and is justified in sufficient detail and the risks to be addressed with the proposed restriction are well described. <p>Hazard(s):</p> <ul style="list-style-type: none"> The description of the identified hazards is adequate for the substances covered by the proposed restriction and considers it well justified. Creosote is a well-established non-threshold substance, based on the content of PAHs as fulfilling the PBT and/or vPvB criteria and being carcinogenic Cat. 1B, with wood creosote as the only exception. <p>Evaluation of emissions and exposure</p> <ul style="list-style-type: none"> The manufacture, import, export and uses of creosote-treated wood are clearly identified and described in the Background Document. In spite of a lack of adequate quantitative data on emissions from creosote-treated wood during reuse and secondary use, the releases and exposure are highly likely during the further service life of the creosote-treated wood. Old creosote-treated sleepers are readily available on the second-hand market in many EU Member States resulting in a widespread potential for emissions and exposure to PAHs. <p>Risk characterisation</p> <ul style="list-style-type: none"> The creosote and creosote-related substances with PBT and/or vPvB and carcinogenic properties should be considered as non-threshold substances and that a quantitative risk characterisation is not appropriate. The emissions should be minimised and effects of exposure to non- 	<p>Rapporteurs to prepare a short presentation to RAC-64 to report back.</p> <p>Rapporteurs to take the WG discussions (and RAC written comments received) into account for the next version of the opinion by April 2023 prior to the May RAC-65 Working Group on restrictions.</p> <p>(Secretariat to table this item for discussion at RAC-65 WG in May 2023.)</p> <p>Stakeholders to submit additional information (especially on exposure) via the third-party consultation on the Annex XV dossier.</p>
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threshold carcinogens should be avoided. **The current uses cause emissions and exposure** and therefore there is a risk that needs to be addressed at the EU level.

- The environmental and human health risk from the non-threshold PAHs in creosote-treated wood cannot be quantified, but need to be minimised by not allowing reuse and secondary use of such treated wood.

Existing OCs and RMMs

- The currently recommended and implemented operational conditions (OCs) and risk management measures (RMMs) are not sufficient or effective to control the risk.
- RAC is not aware of any RMMs implementable by the general public (consumers), recommended by the manufactures and/or importers, that could decrease the risk during reuse or secondary use, and even if such information were provided when buying the products, it is most likely not available after ≥ 20 years of use.
- RAC is not aware of any OCs and RMMs for professional users either that could decrease the risk during reuse or secondary use.

Existing regulatory management measures

- Reuse and secondary uses of creosote-treated wood are in principle regulated by REACH (and not by the BPR), but the current wording of Entry 31 of REACH Annex XVII is interpreted or applied differently among the EU Member States, indicating that existing regulatory management measures are not sufficient to control the risk.

Justification that action is required on a union wide basis

<ul style="list-style-type: none"> Based on the key principle of ensuring a high level of protection across the EU, RAC concludes that any necessary action to address the risk(s) associated with the secondary use and reuse (also in the second-hand market) of creosote and creosote related substances should be implemented in all Member States. <p>Further work required</p> <p><i>The WG recommended that rapporteurs continue their work on these elements and present the next version of the opinion at RAC-65 REST WG:</i></p> <ul style="list-style-type: none"> Conclude the evaluation that action is required on an EU-wide basis Initial evaluation that the proposed restriction is the most appropriate EU-wide measure (effectiveness, other RMOs, practicality and monitorability) 	
<p>The expert accompanying the regular CEFIC stakeholder observer commented on the scope (particularly of wash oil) and the enforceability of substances listed in CAS number 8001-58-9. The regular stakeholder commented on the exposure (use of creosote and secondary use of railway sleepers).</p>	

5. REST horizontal issues

The Secretariat presented the capacity building presentation on exposure assessment.

6. Adoption of the report from the RAC REST working group

Before the Chair thanked the participants and closed the meeting, the WG adopted its report of the 8th Meeting.

LIST OF ANNEXES

Annex I **Final Agenda of the of the 8th Meeting of the Committee for Risk Assessment Working Group on Restrictions**

Annex II **List of participants**

Annex III Declarations of potential conflicts of interest

Annex I

23 February 2023
RAC WG/A/REST64/2023
Final

Final Agenda
Meeting of the Committee for Risk Assessment Restrictions
Working Group (RAC REST WG) reporting to RAC-64

14-16 February 2023

WebEx meeting

14 February starts at 10:00
16 February ends at 15:00

Times are Helsinki times

Item 1 – Welcome and Apologies

Item 2 – Adoption of the Agenda

RAC WG/A/REST64/2023
For adoption

Item 3 – Declarations of conflicts of interest to the Agenda

Item 4 – Restriction proposals

1. PFASs in firefighting foams – third draft opinion
2. DMAC/NEP – third draft opinion
3. Terphenyl, hydrogenated – third draft opinion
4. Chloroalkanes, C14-C17 – second draft opinion
5. BPA+ - first draft opinion
6. Creosote, and creosote related substances – first draft opinion

For discussion

Item 5 – Horizontal issues

Capacity building

Item 6 – Adoption of the Report from the WG

For discussion and agreement

Annex II

List of participants

RAC Members	
Surname	Name
Angeli	Karine
Deviller	Genevieve
Doak	Malcolm
Docea	Anca
Esposito	Dania
Facchin	Manuel
Fernández	Mariana F
Geoffroy	Laure
Ginnity	Bridget
Hakkert	Betty
Kadikis	Normunds
Karadjova	Irina
Leinonen	Riitta
Losert	Annemarie
Lund	Bert-Ove
Martinek	Michal
Menard	Srpčič Anja
Moeller	Ruth
Mohammed	Ifthekhar Ali
Moldov	Raili
Neumann	Michael
Piña	Benjamin
Pribu	Mihaela
Rakkestad	Kirsten Eline
Rodriguez	Wendy
Santonen	Tiina
Schlüter	Urs
Schulte	Agnes

Schuur	Gerlienke
Tekpli	Nina Landvik
Tobiassen	Lea Stine
Varnai	Veda Marija
Viegas	Susana

RAC Members' advisers		
Surname	Name	Nominated by
De Groot	Stan	Gerlienke Schuur
Dumke	Carolyn	Urs Schlüter
Hoffmann	Frauke	Agnes Schulte
Moilanen	Marianne	Riitta Leinonen
Marinkovic	Marino	Gerlienke Schuur
Nielsen	Peter Juhl	Lea Stine Tobiassen
Panieri	Emiliano	Dania Esposito
Rehrl	Anna-Lena	Manuel Facchin
Rother	Dag	Urs Schlüter
Smith	Jenny	Malcom Doak
Stalter	Daniel	Agnes Schulte

Invited experts		
Surname	Name	Substance
Dannenberg	Carl	PFAS in firefighting foams
Ivarsson	Jenny	PFAS in firefighting foams
Peltzer	Eike	PFAS in firefighting foams
Ramsden	Niall	PFAS in firefighting foams
Winther	Toke	PFAS in firefighting foams

SEAC Rapporteurs

Surname	Name	Substance
Brignon	Jean-Marc	PFAS
Kiiski	Johanna	PFAS in firefighting foams
Rodriguez	Manuel	Terphenyl
Rouw	Aart	Bisphenol A

Dossier Submitters			
Surname	Name	Authority	Substance
Arning	Jürgen	UBA	Bisphenols
Brett-Smith	Catharina	UBA	BPA+
Galert	Wiebke	UBA	BPA+
Unkelbach	Christian	BAUA	BPA+
Drissi-Amraoui	Sammy	French Government	Creosote
Jomini	Stephane	ANSES	Creosote
Pasquier	Elodie	ANSES	Creosote
Jongeneel	Rob	RIVM	DMAC/NEP
Castelli	Stefano	ENEA	Terphenyl, hydrogenated
Catone	Tiziana	ISS	Terphenyl, hydrogenated
Alivernini	Silvia	ISS	Terphenyl, hydrogenated
Orru	Maria Antonietta	ISS	Terphenyl, hydrogenated

Regular Stakeholder Observers		
Surname	Name	Organisation
Barry	Frank	ETUI
Cassart	Michel	PlasticsEurope
Hinkal	George	CONCAWE
Janosi	Amaya	Cefic
Robinson	Jan	A.I.S.E.
Romano	Dolores	EEB
Ruelens	Paul	CropLife Europe
Verougstraete	Violaine	Eurometaux

Occasional Stakeholder Observers			
Surname	Name	Organisation	Substance
Barbu	Luminita	EDANA	BPA+ restriction proposal - first opinion and Capacity building on exposure assessment
Leonhardt	Thomas	EUROFEU	PFAS in firefighting foams
Tillieux	Geoffroy	EuPC	MCCP restriction BPA and BOSC restriction

Stakeholder Experts			
Surname	Name	Nominated by	Substance
Barber	David	CropLife	PFAs in firefighting foams
Bock	Ronald	Cefic	PFAs in firefighting foams
Bral	Emmanuel	EuPC Expert	BPA
Consoli	Elisa	Eurometaux	PFAS in firefighting foams
Eichler-Haeske	Jens-Olaf	Cefic	DMAC/NEP
Ewald	Dirk	Eurometaux	BPA+
Gestermann	Sven	PlasticsEurope	BPA+
Hannebaum	Peter	Eurofeu	PFAS in firefighting foams
Höke	Hartmut	Cefic	Creosote and creosote-related substances

Howick	Chris	Cefic	MCCP, chloroalkenens
Hunziker	René	Cefic	BPA+
Möller	Guido	EuPC Expert	BPA+
Steneholm	Anna	Concawe	Firefighting foams, capacity building
Wietor	Jean-Luc	EEB	PFAS in firefighting foams and BPA+

European Commission	
Surname	Name
Beekman	Martijn
Bertato	Valentina
Dunauskiene	Lina
Fabbri	Marco
Kilian	Karin
Streck	Georg
Tosetti	Patrizia

ECHA Staff	
Surname	Name
Alami-Eerikiharju	Wafa
Anagnostakis	Konstantinos
Barnewitz	Greta
Bowmer	Tim, Chairman of RAC
Doyle	Simone
Klausbruckner	Carmen
Lazic	Nina
Lefevre	Sandrine
Lisboa	Patricia
Logtmeijer	Christiaan, co-chair
Marquez-Camacho	Mercedes, co-chair

Niemela	Helena
Nygård	Daniel
Orispää	Katja
Pellizzato	Francesca
Peltola-Thies	Johanna, Deputy Chair of RAC
Peltola	Jukka
Pillet	Monique
Reuter	Ulrike
Roggeman	Maarten
Salo	Marta
Sosnowski	Piotr, co- chair
Thierry-Mieg	Morgane
Tunnela	Outi
van Haelst	Anniek
Zeiger	Bastian

ANNEX III

Declarations of potential conflicts of interest

The following participants, including those for whom the Chairman declared the interest on their behalf, declared potential conflicts of interest with the Agenda items (according to Art 9 (2) of RAC RoPs)

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
ALREADY DECLARED AT PREVIOUS RAC PLENARY MEETING(S)		
Restrictions		
DMAC/NEP	Gerlienke SCHUUR	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement
NEW		
BPA+	Agnes SCHULTE	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement
BPA+	Urs SCLUETER	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement
BPA+	Michael NEUMANN	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation measures applied. No personal involvement
Terphenyl, hydrogenated	Dania ESPOSITO	Working for the CA submitting the dossier; asked to refrain from voting in the event of a vote on this substance - no other mitigation

AP/Dossier / DS	RAC Member	Reason for potential CoI / Working for
		measures applied. No personal involvement