

# EU PFAS制限案 パブコメ状況まとめ

Summary of Public Comments for EU PFAS Restriction Proposal

2023年9月18日現在 (8月22日提出分まで)

As of 2023/9/18 (Submission by 8/22)

FCJ (日本フッ素ケミカルプロダクト協議会)

Conference of Fluoro-Chemical Product Japan

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# パブコメ掲載ファイル一覧 (Published Public Comment Files)

パブコメ掲載場所: <https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e18663449b>

Comments on Annex XV report

-  RCOM
-  RCOM index
-  RCOM part 10
-  RCOM part 11
-  RCOM part 12
-  RCOM part 13
-  RCOM part 14
-  RCOM part 15
-  RCOM part 16
-  RCOM part 17
-  RCOM part 18
-  RCOM part 19
-  RCOM part 20
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-  RCOM part 22
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-  RCOM part 25
-  RCOM part 26
-  RCOM part 27
-  RCOM part 28
-  RCOM part 29
-  RCOM part 2
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-  RCOM part 31
-  RCOM part 32
-  RCOM part 33
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-  RCOM part 38
-  RCOM part 39
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-  RCOM part 40
-  RCOM part 41
-  RCOM part 42
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-  RCOM part 44
-  RCOM part 45
-  RCOM part 46
-  RCOM part 47
-  RCOM part 48
-  RCOM part 49
-  RCOM part 4
-  RCOM part 50
-  RCOM part 5
-  RCOM part 6
-  RCOM part 7
-  RCOM part 8
-  RCOM part 9

# パブコメ掲載ファイルと提出番号 (List of Public Comment Files & Submission Numbers)

パブコメ掲載場所: <https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e18663449b>

<u>Word File Name</u>	<u>Submission No.</u>	<u>Remarks</u>	<u>Word File Name</u>	<u>Submission No.</u>	<u>Remarks</u>
ワードファイル名	提出番号	備考	ワードファイル名	提出番号	備考
RCOM	～ 3918	5月末までの提出分 (6/12公開)	RCOM part 27	～ 6011	7月末までの提出分 (8/7公開)
RCOM part 2	～ 3931	"	RCOM part 28	～ 6057	"
RCOM part 3	～ 3960	"	RCOM part 29	～ 6101	"
RCOM part 4	～ 4009	"	RCOM part 30	～ 6141	"
RCOM part 5	～ 4041	"	RCOM part 31	～ 6173	"
RCOM part 6	～ 4064	"	RCOM part 32	～ 6203	"
RCOM part 7	～ 4080	"	RCOM part 33	～ 6241	"
RCOM part 8	～ 4107	"	RCOM part 34	～ 6285	"
RCOM part 9	～ 4160	"	RCOM part 35	～ 6319	"
RCOM part 10	～ 4208	"	RCOM part 36	～ 6332	"
RCOM part 11	～ 4261	"	RCOM part 37	～ 6350	"
RCOM part 12	～ 4270	"	RCOM part 38	～ 6361	"
RCOM part 13	～ 4308	"	RCOM part 39	～ 6398	"
RCOM part 14	～ 4338	"	RCOM part 40	～ 6420	"
RCOM part 15	～ 4346	"	RCOM part 41	～ 6514	8/22までの提出分 (9/18公開)
RCOM part 16	～ 4400	"	RCOM part 42	～ 6546	"
RCOM part 17	～ 4427	"	RCOM part 43	～ 6603	"
RCOM part 18	～ 4453	"	RCOM part 44	～ 6639	"
RCOM part 19	～ 4465	"	RCOM part 45	～ 6671	"
RCOM part 20	～ 4504	6月末までの提出分 (7/12公開)	RCOM part 46	～ 6687	"
RCOM part 21	～ 4563	"	RCOM part 47	～ 6732	"
RCOM part 22	～ 4604	"	RCOM part 48	～ 6770	"
RCOM part 23	～ 4752	"	RCOM part 49	～ 6785	"
RCOM part 24	～ 5907	"	RCOM part 50	～ 6843	"
RCOM part 25	～ 5970	"			
RCOM part 26	～ 5985	"			

# パブコメ提出数の推移 (Trend for Numbers of Public Comments)

5月まで (by End May)

EU PFAS 制限案 パブコメ提出状況 (Part 1-19)

Country / 国名	Submission numbers / 提出数	Ratio / 割合
Austria	19	3%
Belgium	21	4%
China	2	0%
Denmark	4	1%
Finland	2	0%
France	11	2%
Germany	150	25%
Hungary	2	0%
Ireland	4	1%
Israel	3	1%
Italy	15	3%
Jamaica	1	0%
Japan	277	46%
Korea, Republic of	2	0%
Netherlands	24	4%
Norway	2	0%
Portugal	1	0%
Romania	1	0%
Serbia	1	0%
Spain	4	1%
Sweden	6	1%
Switzerland	11	2%
Turkey	3	1%
United Kingdom	16	3%
United States of America	16	3%
<b>Total / 総計</b>	<b>598</b>	<b>100%</b>

6月まで (by End June)

EU PFAS 制限案 パブコメ提出状況 (Part 1-26)

Country / 国名	Submission numbers / 提出数	Ratio / 割合
Austria	24	1%
Belgium	33	2%
Bulgaria	1	0%
China	4	0%
Czech Republic	3	0%
Denmark	8	0%
Finland	7	0%
France	28	1%
Germany	216	11%
Hungary	6	0%
India	1	0%
Ireland	5	0%
Israel	3	0%
Italy	28	1%
Jamaica	1	0%
Japan	350	17%
Korea, Republic of	5	0%
Luxembourg	1	0%
Mexico	1	0%
Netherlands	29	1%
Norway	3	0%
Poland	1	0%
Portugal	3	0%
Romania	1	0%
Serbia	1	0%
Spain	6	0%
Sweden	1,201	59%
Switzerland	19	1%
Tanzania, United Republic of	1	0%
Turkey	3	0%
United Kingdom	26	1%
United States of America	22	1%
<b>Total / 総計</b>	<b>2,041</b>	<b>100%</b>

7月まで (by End July)

EU PFAS 制限案 パブコメ提出状況 (Part 1-40)

Country / 国名	Submission numbers / 提出数	Ratio / 割合
Australia	1	0%
Austria	31	1%
Belgium	63	3%
Bulgaria	1	0%
China	5	0%
Czech Republic	4	0%
Denmark	10	0%
Finland	9	0%
France	41	2%
Germany	321	13%
Greece	2	0%
Hungary	6	0%
India	1	0%
Ireland	8	0%
Israel	5	0%
Italy	37	1%
Jamaica	1	0%
Japan	440	18%
Korea, Republic of	7	0%
Lithuania	1	0%
Luxembourg	2	0%
Mexico	1	0%
Netherlands	36	1%
Norway	3	0%
Poland	2	0%
Portugal	3	0%
Romania	1	0%
Serbia	1	0%
Spain	9	0%
Sweden	1,312	53%
Switzerland	31	1%
Tanzania, United Republic of	1	0%
Turkey	4	0%
United Arab Emirates	1	0%
United Kingdom	32	1%
United States of America	40	2%
<b>Total / 総計</b>	<b>2,473</b>	<b>100%</b>

8/22 まで (by August 22)

EU PFAS 制限案 パブコメ提出状況 (Part 1-50)

Country / 国名	Submission numbers / 提出数	Ratio / 割合
Australia	1	0%
Austria	36	1%
Belgium	79	3%
Bulgaria	2	0%
China	52	2%
Czech Republic	8	0%
Denmark	11	0%
Finland	10	0%
France	55	2%
Germany	464	16%
Greece	2	0%
Hungary	9	0%
India	2	0%
Ireland	10	0%
Israel	6	0%
Italy	44	2%
Jamaica	1	0%
Japan	545	19%
Korea, Republic of	10	0%
Lithuania	1	0%
Luxembourg	2	0%
Mexico	2	0%
Netherlands	42	1%
Norway	4	0%
Poland	6	0%
Portugal	3	0%
Romania	2	0%
Serbia	1	0%
Slovakia	1	0%
Slovenia	1	0%
Spain	13	0%
Sweden	1,323	46%
Switzerland	45	2%
Taiwan	6	0%
Tanzania, United Republic of	1	0%
Thailand	1	0%
Turkey	6	0%
United Arab Emirates	1	0%
United Kingdom	40	1%
United States of America	48	2%
<b>Total / 総計</b>	<b>2,896</b>	<b>100%</b>

## 国別、組織別 提出状況 (Numbers of Submission by Country and Organization type)

Country / 国名	Submission numbers / 提出数	%
Australia	1	0%
Austria	36	1%
Belgium	79	3%
Bulgaria	2	0%
China	52	2%
Czech Republic	8	0%
Denmark	11	0%
Finland	10	0%
France	55	2%
Germany	464	16%
Greece	2	0%
Hungary	9	0%
India	2	0%
Ireland	10	0%
Israel	6	0%
Italy	44	2%
Jamaica	1	0%
Japan	545	19%
Korea, Republic of	10	0%
Lithuania	1	0%
Luxembourg	2	0%
Mexico	2	0%
Netherlands	42	1%
Norway	4	0%
Poland	6	0%
Portugal	3	0%
Romania	2	0%
Serbia	1	0%
Slovakia	1	0%
Slovenia	1	0%
Spain	13	0%
Sweden	1,323	46%
Switzerland	45	2%
Taiwan	6	0%
Tanzania, United Republic of	1	0%
Thailand	1	0%
Turkey	6	0%
United Arab Emirates	1	0%
United Kingdom	40	1%
United States of America	48	2%
<b>Total / 総計</b>	<b>2,896</b>	<b>100%</b>

Organization Type / 組織名	Submission numbers / 提出数	%
Academic institution	9	0%
Company	969	33%
European institution	1	0%
Government	1	0%
Individual	1,775	61%
Industry or trade association	114	4%
International NGO	4	0%
International organisation	6	0%
MemberState	1	0%
National Authority	2	0%
Other contributor	7	0%
National NGO	5	0%
Trade union	1	0%
Regional or local authority	1	0%
<b>Total / 総計</b>	<b>2,896</b>	<b>100%</b>

# 国-組織別 提出状況

## (Numbers of Submission by Country - Organization type)

Country - Organization / 国 - 組織	Submission numbers / 提出数	Country - Organization / 国 - 組織	Submission numbers / 提出数	Country - Organization / 国 - 組織	Submission numbers / 提出数	Country - Organization / 国 - 組織	Submission numbers / 提出数
☒ <b>Australia</b>	<b>1</b>	☒ <b>Greece</b>	<b>2</b>	☒ <b>Netherlands</b>	<b>42</b>	☒ <b>Taiwan</b>	<b>6</b>
Company	1	Company	1	Company	36	Individual	6
☒ <b>Austria</b>	<b>36</b>	Individual	1	Individual	6	☒ <b>Tanzania, United Republic of</b>	<b>1</b>
Company	27	☒ <b>Hungary</b>	<b>9</b>	☒ <b>Norway</b>	<b>4</b>	Individual	1
Individual	8	Company	2	Company	2	☒ <b>Thailand</b>	<b>1</b>
Other contributor	1	Individual	7	Individual	1	Individual	1
☒ <b>Belgium</b>	<b>79</b>	☒ <b>India</b>	<b>2</b>	International organisation	1	☒ <b>Turkey</b>	<b>6</b>
Company	21	Company	1	☒ <b>Poland</b>	<b>6</b>	Company	4
European institution	1	Individual	1	Company	2	Individual	2
Individual	17	☒ <b>Ireland</b>	<b>10</b>	Individual	4	☒ <b>United Arab Emirates</b>	<b>1</b>
Industry or trade association	37	Company	8	☒ <b>Portugal</b>	<b>3</b>	Company	1
International NGO	2	Individual	2	Company	2	☒ <b>United Kingdom</b>	<b>40</b>
MemberState	1	☒ <b>Israel</b>	<b>6</b>	Individual	1	Academic institution	1
☒ <b>Bulgaria</b>	<b>2</b>	Company	4	☒ <b>Romania</b>	<b>2</b>	Company	27
Company	1	Individual	2	Individual	1	Individual	9
Individual	1	☒ <b>Italy</b>	<b>44</b>	National Authority	1	Industry or trade association	2
☒ <b>China</b>	<b>52</b>	Company	33	☒ <b>Serbia</b>	<b>1</b>	International NGO	1
Company	7	Individual	10	Company	1	☒ <b>United States of America</b>	<b>48</b>
Individual	45	Industry or trade association	1	☒ <b>Slovakia</b>	<b>1</b>	Company	24
☒ <b>Czech Republic</b>	<b>8</b>	☒ <b>Jamaica</b>	<b>1</b>	Company	1	Individual	10
Company	2	Individual	1	☒ <b>Slovenia</b>	<b>1</b>	Industry or trade association	12
Individual	6	☒ <b>Japan</b>	<b>545</b>	Individual	1	International organisation	1
☒ <b>Denmark</b>	<b>11</b>	Academic institution	1	☒ <b>Spain</b>	<b>13</b>	Other contributor	1
Company	5	Company	401	Company	6	<b>Total / 総計</b>	<b>2,896</b>
Individual	6	Government	1	Individual	6		
☒ <b>Finland</b>	<b>10</b>	Individual	110	Industry or trade association	1		
Company	3	Industry or trade association	30	☒ <b>Sweden</b>	<b>1,323</b>		
Individual	7	International organisation	1	Company	13		
☒ <b>France</b>	<b>55</b>	Other contributor	1	Individual	1,299		
Company	25	☒ <b>Korea, Republic of</b>	<b>10</b>	International organisation	1		
Individual	20	Company	5	National Authority	1		
Industry or trade association	8	Individual	4	Other contributor	3		
International organisation	1	Industry or trade association	1	National NGO	5		
Trade union	1	☒ <b>Lithuania</b>	<b>1</b>	Regional or local authority	1		
☒ <b>Germany</b>	<b>464</b>	Company	1	☒ <b>Switzerland</b>	<b>45</b>		
Academic institution	6	☒ <b>Luxembourg</b>	<b>2</b>	Academic institution	1		
Company	279	Company	1	Company	21		
Individual	161	Individual	1	Individual	16		
Industry or trade association	16	☒ <b>Mexico</b>	<b>2</b>	Industry or trade association	6		
International organisation	1	Company	1	International NGO	1		
Other contributor	1	Individual	1				

## 国別、提出者別 状況 (Individual として提出されたものは除く) Submission List by Country/Submitters (Excluding Individuals)

別紙 PDFファイルをご覧ください。

以上