

# 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10月2日現在 (8月30日提出分まで)

As of 2023/10/2 (Submission by 8/30)

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/restrictions-under-consideration/-/substance-rev/72301/term>

Comments submitted to date on restriction report	
	Part 1
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	Part 56
	Part 57

# 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/restrictions-under-consideration/-/substance-rev/72301/term>

<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			
Part 1	～ 3918	5月末までの提出分 (6/12公開)	Part 31	～ 6173	"
Part 2	～ 3931	Submission by End May (Published on 6/12)	Part 32	～ 6203	"
Part 3	～ 3960	"	Part 33	～ 6241	"
Part 4	～ 4009	"	Part 34	～ 6285	"
Part 5	～ 4041	"	Part 35	～ 6319	"
Part 6	～ 4064	"	Part 36	～ 6332	"
Part 7	～ 4080	"	Part 37	～ 6350	"
Part 8	～ 4107	"	Part 38	～ 6361	"
Part 9	～ 4160	"	Part 39	～ 6398	"
Part 10	～ 4208	"	Part 40	～ 6420	"
Part 11	～ 4261	"	Part 41	～ 6514	8/22までの提出分 (9/18公開)
Part 12	～ 4270	"	Part 42	～ 6546	Submission by 22nd August (Published on 9/18)
Part 13	～ 4308	"	Part 43	～ 6603	"
Part 14	～ 4338	"	Part 44	～ 6639	"
Part 15	～ 4346	"	Part 45	～ 6671	"
Part 16	～ 4400	"	Part 46	～ 6687	"
Part 17	～ 4427	"	Part 47	～ 6732	"
Part 18	～ 4453	"	Part 48	～ 6770	"
Part 19	～ 4465	"	Part 49	～ 6785	"
Part 20	～ 4504	6月末までの提出分 (7/12公開)	Part 50	～ 6843	"
Part 21	～ 4563	Submission by End June (Published on 7/12)	Part 51	～ 6893	8/30までの提出分 (10/2公開)
Part 22	～ 4604	"	Part 52	～ 6925	Submission by 30th August (Published on 10/2)
Part 23	～ 4752	"	Part 53	～ 6998	"
Part 24	～ 5907	"	Part 54	～ 7018	"
Part 25	～ 5970	"	Part 55	～ 7078	"
Part 26	～ 5985	"	Part 56	～ 7116	"
Part 27	～ 6011	7月末までの提出分 (8/7公開)	Part 57	～ 7144	"
Part 28	～ 6057	Submission by End July (Published on 8/7)			
Part 29	～ 6101	"			
Part 30	～ 6141	"			

# 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)  
Public Comments Submission Status (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)  
Public Comments Submission Status (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)  
Public Comments Submission Status (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)  
Public Comments Submission Status (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%
Switzerland	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>

8/30まで (by August 30)  
EU PFAS 制限案 パブコメ提出状況 (Part 1-57)  
Public Comments Submission Status (Part 1-57)

Country / 国名	Submission numbers / 提出数	%
Australia	1	0%
Austria	39	1%
Belgium	85	3%
Bulgaria	2	0%
Canada	1	0%
China	146	5%
Czech Republic	10	0%
Denmark	14	0%
Finland	11	0%
France	59	2%
Germany	520	16%
Greece	3	0%
Hong Kong	1	0%
Hungary	9	0%
India	2	0%
Ireland	12	0%
Israel	6	0%
Italy	51	2%
Jamaica	1	0%
Japan	623	19%
Korea, Republic of	25	1%
Latvia	1	0%
Lithuania	1	0%
Luxembourg	3	0%
Mexico	2	0%
Netherlands	44	1%
Norway	4	0%
Poland	7	0%
Portugal	4	0%
Romania	2	0%
Serbia	1	0%
Slovakia	2	0%
Slovenia	1	0%
Spain	17	1%
Sweden	1,325	41%
Switzerland	46	1%
Taiwan	12	0%
Tanzania, United Republic of	1	0%
Thailand	1	0%
Turkey	6	0%
United Arab Emirates	1	0%
United Kingdom	42	1%
United States of America	53	2%
<b>Total / 総計</b>	<b>3,197</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	39	1%
Belgium	85	3%
Bulgaria	2	0%
Canada	1	0%
China	146	5%
Czech Republic	10	0%
Denmark	14	0%
Finland	11	0%
France	59	2%
Germany	520	16%
Greece	3	0%
Hong Kong	1	0%
Hungary	9	0%
India	2	0%
Ireland	12	0%
Israel	6	0%
Italy	51	2%
Jamaica	1	0%
Japan	623	19%
Korea, Republic of	25	1%
Latvia	1	0%
Lithuania	1	0%
Luxembourg	3	0%
Mexico	2	0%
Netherlands	44	1%
Norway	4	0%
Poland	7	0%
Portugal	4	0%
Romania	2	0%
Serbia	1	0%
Slovakia	2	0%
Slovenia	1	0%
Spain	17	1%
Sweden	1,325	41%
Switzerland	46	1%
Taiwan	12	0%
Tanzania, United Republic of	1	0%
Thailand	1	0%
Turkey	6	0%
United Arab Emirates	1	0%
United Kingdom	42	1%
United States of America	53	2%
<b>Total / 総計</b>	<b>3,197</b>	<b>100%</b>

Organization Type / 組織名	Submission numbers / 提出数	%
Academic institution	13	0%
Company	1,537	48%
European institution	1	0%
Government	1	0%
Individual	1,438	45%
Industry or trade association	170	5%
International NGO	6	0%
International organisation	8	0%
MemberState	1	0%
National Authority	3	0%
Other contributor	10	0%
National NGO	5	0%
Trade union	2	0%
Regional or local authority	2	0%
<b>Total / 総計</b>	<b>3,197</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						
<b>Australia</b>	<b>1</b>	<b>Germany</b>	<b>520</b>	<b>Latvia</b>	<b>1</b>	<b>Switzerland</b>	<b>46</b>
Company	1	Academic institution	8	Individual	1	Academic institution	1
<b>Austria</b>	<b>39</b>	Company	441	<b>Lithuania</b>	<b>1</b>	Company	30
Company	34	Individual	36	Company	1	Individual	5
Individual	4	Industry or trade association	31	<b>Luxembourg</b>	<b>3</b>	Industry or trade association	8
Other contributor	1	International organisation	1	Company	2	International NGO	1
<b>Belgium</b>	<b>85</b>	Other contributor	3	Individual	1	Regional or local authority	1
Company	30	<b>Greece</b>	<b>3</b>	<b>Mexico</b>	<b>2</b>	<b>Taiwan</b>	<b>12</b>
European institution	1	Company	2	Company	2	Company	8
Individual	5	Individual	1	<b>Netherlands</b>	<b>44</b>	Individual	4
Industry or trade association	42	<b>Hong Kong</b>	<b>1</b>	Company	40	<b>Tanzania, United Republic of</b>	<b>1</b>
International NGO	3	Company	1	Individual	3	Individual	1
International organisation	1	<b>Hungary</b>	<b>9</b>	Industry or trade association	1	<b>Thailand</b>	<b>1</b>
MemberState	1	Company	4	<b>Norway</b>	<b>4</b>	Company	1
Other contributor	1	Individual	4	Company	2	<b>Turkey</b>	<b>6</b>
Trade union	1	Industry or trade association	1	Individual	1	Company	6
<b>Bulgaria</b>	<b>2</b>	<b>India</b>	<b>2</b>	International organisation	1	<b>United Arab Emirates</b>	<b>1</b>
Company	2	Company	2	<b>Poland</b>	<b>7</b>	Company	1
<b>Canada</b>	<b>1</b>	<b>Ireland</b>	<b>12</b>	Company	6	<b>United Kingdom</b>	<b>42</b>
Company	1	Company	12	Individual	1	Academic institution	1
<b>China</b>	<b>146</b>	<b>Israel</b>	<b>6</b>	<b>Portugal</b>	<b>4</b>	Company	31
Company	134	Company	5	Company	3	Individual	4
Individual	12	Individual	1	Individual	1	Industry or trade association	4
<b>Czech Republic</b>	<b>10</b>	<b>Italy</b>	<b>51</b>	<b>Romania</b>	<b>2</b>	International NGO	1
Company	6	Company	43	Company	1	International organisation	1
Individual	3	Individual	6	National Authority	1	<b>United States of America</b>	<b>53</b>
National Authority	1	Industry or trade association	1	<b>Serbia</b>	<b>1</b>	Company	34
<b>Denmark</b>	<b>14</b>	International NGO	1	Company	1	Individual	3
Academic institution	1	<b>Jamaica</b>	<b>1</b>	<b>Slovakia</b>	<b>2</b>	Industry or trade association	14
Company	8	Individual	1	Company	2	International organisation	1
Individual	5	<b>Japan</b>	<b>623</b>	<b>Slovenia</b>	<b>1</b>	Other contributor	1
<b>Finland</b>	<b>11</b>	Academic institution	1	Company	1	<b>Total / 総計</b>	<b>3,197</b>
Academic institution	1	Company	554	<b>Spain</b>	<b>17</b>		
Company	4	Government	1	Company	13		
Individual	6	Individual	15	Individual	3		
<b>France</b>	<b>59</b>	Industry or trade association	50	Industry or trade association	1		
Company	37	International organisation	1	<b>Sweden</b>	<b>1,325</b>		
Individual	10	Other contributor	1	Company	15		
Industry or trade association	10	<b>Korea, Republic of</b>	<b>25</b>	Individual	1,299		
International organisation	1	Company	16	International organisation	1		
Trade union	1	Individual	2	National Authority	1		
		Industry or trade association	7	Other contributor	3		
				National NGO	5		
				Regional or local authority	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