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Mr. Daniel Calleja Crespo
Director General
Directorate-General for Environment
European Commission

1049 Brussels
Belgium

Contact	Dr. [REDACTED]	Phone	[REDACTED]
Department	Core Engineering	Email	[REDACTED]@garmin.com
Subject	Impact of the COVID-19 outbreak on compliance with Commission Regulation 2017/1000		
		Date	02.04.2020

Dear Mr. Crespo,

Commission Regulation (EU) 2017/1000 addresses perfluorooctanoic acid (PFOA), its salts and related substances. This regulation will go into force on 4 July 2020. These substances are used in lubricants and adhesives used in the electronics industry, in fire-fighting as surfactants, implantable medical devices, as well as in stain-resistant carpet and in textiles providing safety for workers against health risks. Scientists have been working on alternative chemical formulations since 2017 when the regulation was published.

Garmin is one of many members of the trade association ITIC (Information Technology Industry Council) who have been told by our upstream material suppliers that the COVID-19 pandemic has delayed the start-up of production with their new PFOA-compliant chemical formulations. The delays that suppliers are experiencing are most severe in China. Since PFOA's can be found in a variety of materials, this issue is much broader than just electronics companies. Please know that these companies, represented by ITIC, are urgently seeking your assistance in requesting an extension until 1 January 2021.

Several large international companies including Intel, HP and Garmin are have hit strong headwinds in our efforts to meet the 4 July deadline for the PFOA regulation due to the supply chain problems caused by the COVID-19 pandemic. Suppliers in China had to redesign and retest lubricants, adhesives and other products in order to comply with the PFOA regulation, but they lost a minimum of six weeks of valuable time because of the virus-induced shutdown of much of their manufacturing operations. Production at the manufacturers' facilities is still not even close to operating at capacity.

The ITIC member companies know that the drastic PFOA restriction in the new regulation presents steep challenges, in terms of product redesign, to industry's suppliers in China. The current PFOA limit of 1000 parts per million (ppm) is cut to 25 parts per billion (ppb) in the new regulation. This is a reduction of more than 99.99 percent. It is an immense challenge because the new limit is 40,000 times smaller than the historic limit.

The suppliers in China say they'll be able to furnish PFOA-compliant materials by the July/August timeframe, but the product manufacturers in Europe and elsewhere will need time to certify the quality and reliability of the finished products. Thus, the companies represented by ITIC are seeking an extension of the deadline from 4 July to 1 January 2021. We hope that we can count on your support for such an extension.

It may be worth noting also, that the serious challenge of bringing PFOA-compliant materials to market via the supply chains that feed many European firms will be even further exacerbated if the reports of a 2nd wave of COVID-19 in China turn out to be true.

Sincerely,

Garmin Würzburg GmbH



Managing Director



Director Core Engineering