

Til: restrictiePFAS (E7), DE (E1 (E1), ' P1 ' (E1), Toke Winther (@mst.dk), P2 (E2), P3 (E3)

Fra: P4 (E4)

Titel: downstream user industry sign on letter

Sendt: 15-10-2021 19:04

Bilag: alfa- downstream user industry sign on letter.pdf; approflon - downstream user industry sign on letter.pdf; binox - downstream user industry sign on letter.pdf; Cavagna Group Omeca - downstream user industry sign on letter.pdf; DIFLON - downstream user industry sign on letter.pdf; Esa PFAS - downstream user industry sign on letter.pdf; FHT - downstream user industry sign on letter.pdf; fluorseals - downstream user industry sign on letter.pdf; isoflon - downstream user industry sign on letter.pdf; ivr - downstream user industry sign on letter.pdf; Robecchi - downstream user industry sign on letter.pdf; valvole italia - downstream user industry sign on letter.pdf;

Dear authorities

Here attached our, and some of our customers, signed letter where we request for a complete exemption of fluoropolymer from the current PFAS restriction proposal.

Best Regards

P4 P5
Ti1

 family of companies

 D +39 T1 M 
E4
fluorseals.it | in @ f
Via Tribolina, 20/22
24064 Grumello del Monte (BG) - Italy

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Bologna, lì 15.09.2021

Kind attention:

Mr.	P1	- Netherlands	restrictiePFAS@rivm.nl
Dr.	P2	- Germany	ChemG@baua.bund.de
Mrs.	P3	- Sweden	E1
Mr. Toke Winther		- Denmark	towin@mst.dk
Mr.	P4	- Norway	E2
Mr.	P5	- ECHA	E3

Through: fluorseals S.p.A - Via Tribolina, 20/22 - 24064 Grumello del Monte (BG) - Italy

The members of fluorseals S.p.A mainly focus on processing of Fluoropolymers, part manufacturing and its applications, the involvement of downstream users in PFAS process.

Subject: PFAS restriction proposal & request for exemption of FLUOROPOLYMERS

Reference: PFAS - Registry of restriction intentions until outcome (RoI) dated 15th July 2021

Dear Sir/Madam,

With regards to Registry of Intention (RoI) filed by 4 EU Member States (Germany, the Netherlands, Sweden, and Denmark) & Norway for the restriction of PFAS, we, a member of fluoropolymer downstream user industry, hereby, would like to share some salient facts related to the importance of fluoropolymers, critical functionalities, performance and benefits of its applications to society, while acknowledging concerns regarding PFAS emissions related to the use of fluoropolymers and their end of life.

Registry of Intention for PFAS restriction was announced by ECHA on 15th July 2021, to prepare a restriction proposal for PFAS. Fluoropolymers are also included in the scope. The restriction proposal is intended to be submitted to ECHA by 15th July 2022.

Fluoropolymers are a distinct subset of PFAS and are inherently safe, non-mobile, non-bio accumulative and non-toxic. Fluoropolymers are different from other PFAS as they **do not share the toxicological and environmental profiles** associated with PFAS of concern. Fluoropolymers have **unique set of physicochemical properties**, they meet OECD polymer of low concern criteria, and are considered to have **insignificant environmental and human health impact**.

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The fluoropolymer downstream user industry acknowledges the concerns regarding PFAS emissions due to the use of fluoropolymers and end of life processes. We wish to assure the authorities and EU Member States that, we are implementing Best Available Technologies to ensure reduction in PFAS emissions in a systematic way and eventually

eliminating them to achieve EU's sustainability goals. Parallely, we are consciously working on recyclability and reusability to meet circular economy goal.

Fluoropolymers play an important role in achieving EU Green Deal objectives and UN Sustainable Development Goals (UN SDG) because of their vital use in Lithium-ion batteries, Green hydrogen, Fuel Cell, Solar and Wind energy. No new-age technologies are possible without the use of fluoropolymers. Restriction on the use of fluoropolymers would adversely impact implementation of these technologies crucial for planet's future as well as in all existing applications vital for the society.

Considering the benefits of fluoropolymer applications to environment and society, low PFAS emissions and initiatives being taken by the processing industry to further minimize emissions and closing the loop by implementing circular economy wherever possible, we request for a **complete exemption of fluoropolymers from the PFAS restriction proposal.**

Fluoropolymers processed by us: Virgin PTFE

Service application industries: Coating Industries

Sincerely yours,

Name and signature

P6

Company name and address

Alfa Srl – Via Farini 4 – 40124 Bologna (IT)

Alfa S.r.l.

Headquarters: Via Caduti 1-40137 Reno (BO), Italy
Tel. +39 (0) 51 40137 Fax

Registered Office: Via Santa Chiara, 2 I- 40137 – Bologna, Italy

VAT: IT-03364471205 – REA BO: 513367 – Shared Capital € 500.000,00 f.p.

Website: www.alfadispenser.com - E-mail: info@alfadispenser.com - Certified e-mail: alfa14srl@legalmail.it



Date: .07/09/2021

Kind attention:

Mr.	P1	- Netherlands	E7
Dr.	P2	- Germany	E1
Mrs.	P3	- Sweden	E1
Mr. Toke Winther		- Denmark	 @mst.dk
Mr.	P4	- Norway	E2
Mr.	P5	- ECHA	E3

Through: fluorseals S.p.A - Via Tribolina, 20/22 - 24064 Grumello del Monte (BG) - Italy

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Considering the benefits of fluoropolymer applications to environment and society, low PFAS emissions and initiatives being taken by the processing industry to further minimize emissions and closing the loop by implementing circular economy wherever possible, we request for a **complete exemption of fluoropolymers from the PFAS restriction proposal**.

Fluoropolymers processed by us:

Virgin PTFE, PTFE with charge, PCTFE, PFA, FEP, ETFE, PVDF, PEEK

Service application industries:

Chemical, Oil Industry, Medical, Food, Automotive, Aeronautic, Electronic; Mechanical, Construction.

Sincerely yours,

Name and signature

P6





Date: 08/09/2021

Kind attention:

Mr. P1 - Netherlands
Dr. P2 - Germany
Mrs. P3 - Sweden
Mr. Toke Winther - Denmark
Mr. P4 - Norway
Mr. P5 - ECHA

restrictiePFAS@rivm.nl
ChemG@baua.bund.de
E1
towin@mst.dk
E2
E3

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Considering the benefits of fluoropolymer applications to environment and society, low PFAS emissions and initiatives being taken by the processing industry to further minimize emissions and closing the loop



BINOX S.r.l.
Via Industriale, 4
25060 POLAVENO(BS)

Telefono [REDACTED]
Telefax [REDACTED]
R.E.A. Brescia 309902

Reg. Imp. 38479
C.F. 02992570172
P. IVA 00715810982



BINOX

by implementing circular economy wherever possible, we request for a **complete exemption of fluoropolymers from the PFAS restriction proposal.**

Fluoropolymers processed by us:

PTFE

Service application industries:

INDUSTRIALE

Sincerely yours,

Name and signature

P6 ONI GRAZIANO

Company name and address

BINOX SRL

BINOX s.r.l.

Via Industriale, 4 - Tel. [REDACTED]
25060 POLAVENO (Brescia)
C.F.: 02992570172 - P.I.: 00715810982
CCIAA n° 309902 - Reg. Trib. n° 38479

[Handwritten signature]

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Reg. Imp. 38479
C.F. 02992570172
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Cavagna Group - S.p.A. con socio unico - Divisione Omeca
Sede legale e amm.va: Frazione Ponte San Marco, 25011 Calcinato - Brescia (Italy) - Via Statale, 11/13
Tel. 0039 030 9663111 - Fax 0039 030 9969014 - PEC: amm.omeca@pec.cavagnagroup.com
info@cavagnagroup.com - www.cavagnagroup.com
Codice Fiscale ed iscrizione al registro delle imprese di Brescia 01390980173
R.E.A. di Brescia N. 276.144 - N. Mecc. BS 042496 - P.IVA 00622330983 - Cap. Soc. i.v. € 1.807.750,00



La società è sottoposta all'attività di direzione e coordinamento da parte della PARTECA S.p.A. - Codice Fiscale 03008050175

Date: 14th September, 2021

Kind attention:

Mr. P1 - Netherlands
Dr. P2 - Germany
Mrs. P3 - Sweden
Mr. Toke Winther - Denmark
Mr. P4 - Norway
Mr. P5 - ECHA

restrictiePFAS@rivm.nl

ChemG@baua.bund.de

E1

towin@mst.dk

E2

E3

Through: fluorseals S.p.A - Via Tribolina, 20/22 - 24064 Grumello del Monte (BG) - Italy

The members of fluorseals S.p.A mainly focus on processing of Fluoropolymers, part manufacturing and its applications, the involvement of downstream users in PFAS process.

Subject: PFAS restriction proposal & request for exemption of FLUOROPOLYMERS

Reference: PFAS - Registry of restriction intentions until outcome (RoI) dated 15th July 2021

Dear Sir/Madam,

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Considering the benefits of fluoropolymer applications to environment and society, low PFAS emissions and initiatives being taken by the processing industry to further minimize emissions and closing the loop by implementing circular economy wherever possible, we request for a **complete exemption of fluoropolymers from the PFAS restriction proposal.**

Fluoropolymers processed by us:

PTFE

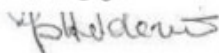
Service application industries:

Production, through machining, washing, assembly and testing phases, of valves and accessories for LPG, for refrigerant gases, for natural gas, for automotive applications, for high pressure industrial applications and for medical applications

Sincerely yours,

Name and signature: Ti1

P6



Company name and address:

CAVAGNA GROUP SPA – Divisione Omeca

Via Statale 11/13, Frazione Ponte San Marco,

25011 Calcinato (BS) - Italy

Date: 03/09/2021

Kind attention:

Mr.	P1	- Netherlands	restrictiePFAS@rivm.nl
Dr.	P2	- Germany	ChemG@baw.bund.de
Mrs.	P3	- Sweden	E1
Mr. Toke Winther		- Denmark	towin@mst.dk
Mr.	P4	- Norway	E2
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Fluoropolymers processed by us:

PTFE/PFA.....

Service application industries:

PHARMA – FOOD – CHEMICAL

Sincerely yours,

Name and signature

P6

DIFLON
TECHNOLOGY S.R.L.
Sede Operativa: Via Sicilia, 8
24060 CAROBBIO D.A. (BG) - ITALY
Tel. +39 035 4051137 - Fax +39 035 4491419
www.diflon.it / E-mail: info@diflon.it

Company name and address

DIFLON TECHNOLOGY S.R.L. – VIA SICILIA, 8 – 24060 CAROBBIO DEGLI ANGELI (BG).....



Esa S.r.l con socio unico

Sede legale: Corso Magenta n. 28 - 20025 Legnano (MI)

Sede commerciale e amministrativa: Via J.F. Kennedy n° 739 – 21050 Marnate (VA)

Phone +39 0331577482 - Fax +39 0331578245

C.F. / P.I. 13392170158

Date: September 7th, 2021

Kind attention:

Mr.	P1	- Netherlands	restrictiePFAS@rivm.nl
Dr.	P2	- Germany	ChemG@baua.bund.de
Mrs.	P3	- Sweden	E1
Mr. Toke Winther		- Denmark	towin@mst.dk
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Subject: PFAS restriction proposal & request for exemption of FLUOROPOLYMERS

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Dear Sir/Madam,

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Fluoropolymers processed by us:

- VERGIN PTFE
- MODIFIED PTFE
- REINFORCED PTFE
- PEEK
- KEL-F
- DEVLON
- NYLON

Service application industries:

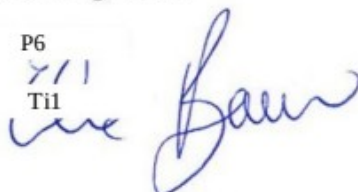
OIL&GAS INDUSTRY, CHEMICAL INDUSTRY, PETROLCHEMICAL

Sincerely yours,

Name and signature

P6

Ti1



Company name and address

ESA srl, Via J. F. Kennedy, n. 739, Marnate (VA) - Italy



Travagliato, 7th September 2021

Kind attention:

Mr. P1 - Netherlands
Dr. P2 - Germany
Mrs. P3 - Sweden
Mr. Toke Winther - Denmark
Mr. P4 - Norway
Mr. P5 - ECHA

restrictiePFAS@rivm.nl
ChemG@bawa.bund.de
E1
towin@mst.dk
E2
E3

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The fluoropolymer downstream user industry acknowledges the concerns regarding PFAS emissions due to the use of fluoropolymers and end of life processes. We wish to assure the authorities and EU Member States that, we are implementing Best Available Technologies to ensure reduction in PFAS emissions in a

FHT Italia S.r.l.

Registered Office: 10, Via Vittor Pisani - 20124 Milan - Italy - VAT No. 09191180968

Operational Headquarters: 52, Via dell'Artigianato - 25039 Travagliato (Brescia) - Italy

Tel. [REDACTED] - Fax [REDACTED] - Email sales@fhtitalia.com



systematic way and eventually eliminating them to achieve EU's sustainability goals. Parallely, we are consciously working on recyclability and reusability to meet circular economy goal.

Fluoropolymers play an important role in achieving EU Green Deal objectives and UN Sustainable Development Goals (UN SDG) because of their vital use in Lithium-ion batteries, Green hydrogen, Fuel Cell, Solar and Wind energy. No new-age technologies are possible without the use of fluoropolymers. Restriction on the use of fluoropolymers would adversely impact implementation of these technologies crucial for planet's future as well as in all existing applications vital for the society.

Considering the benefits of fluoropolymer applications to environment and society, low PFAS emissions and initiatives being taken by the processing industry to further minimize emissions and closing the loop by implementing circular economy wherever possible, we request for a **complete exemption of fluoropolymers from the PFAS restriction proposal.**

Fluoropolymers processed by us: High Pressure PTFE flexible hoses, PTFE tubing, FEP tubing, PFA tubing, Convoluted PTFE tubing, semifinished products like sheets, skived tapes, extruded rods and tubes, molded rods and tubes.

Service application industries: hydraulic & pneumatic, industrial and medical gases, automotive, oil&gas, chemical, packaging, food & beverage, medical devices, textile machinery, paper machinery, ceramic industry

Sincerely yours,

MARCO CHILLEMI

FHT Italia Srl

Via Vittor Pisani 10, 20124 Milano (MI)

FHT Italia S.r.l.

Registered Office: 10, Via Vittor Pisani - 20124 Milan - Italy - VAT No. 09191180968

Operational Headquarters: 52, Via dell'Artigianato - 25039 Travagliato (Brescia) - Italy

Tel. [REDACTED] - Fax [REDACTED] - Email sales@fhtitalia.com

Date: 15-10-2021

Kind attention:

Mr.	P1	- Netherlands	restrictiePFAS@rivm.nl
Dr.	P2	- Germany	ChemG@baua.bund.de
Mrs.	P3	- Sweden	E1
Mr. Toke Winther		- Denmark	towin@mst.dk
Mr.	P4	- Norway	E2
Mr.	P5	- ECHA	E3

Through: Pro-K Industrieverband Halbzeuge und Konsumprodukte aus Kunststoff e.V. (pro-K),
Städelstr. 10, 60596, Frankfurt am Main, Germany

The members of pro-K mainly focus on processing of Fluoropolymers, part manufacturing and its applications, the involvement of downstream users in PFAS process.

Subject: PFAS restriction proposal & request for exemption of FLUOROPOLYMERS

Reference: PFAS - Registry of restriction intentions until outcome (RoI) dated 15th July 2021

Dear Sir/Madam,

With regards to Registry of Intention (RoI) filed by 4 EU Member States (Germany, the Netherlands, Sweden, and Denmark) & Norway for the restriction of PFAS, we, a member of fluoropolymer downstream user industry, hereby, would like to share some salient facts related to the importance of fluoropolymers, critical functionalities, performance and benefits of its applications to society, while acknowledging concerns regarding PFAS emissions related to the use of fluoropolymers and their end of life.

Registry of Intention for PFAS restriction was announced by ECHA on 15th July 2021, to prepare a restriction proposal for PFAS. Fluoropolymers are also included in the scope. The restriction proposal is intended to be submitted to ECHA by 15th July 2022.

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fluorseals S.p.A.

Via Trilolona, 20/22
24064 - Grumetta del Monte (Bs)
Italy

T +39 035 4692811

F +39 035 831410

E info@fluorseals.it

VAT IT08893110166

[fluorseals.it](https://www.fluorseals.it)

The fluoropolymer downstream user industry acknowledges the concerns regarding PFAS emissions due to the use of fluoropolymers and end of life processes. We wish to assure the authorities and EU Member States that, we are implementing Best Available Technologies to ensure reduction in PFAS emissions in a systematic way and eventually eliminating them to achieve EU's sustainability goals. Parallely, we are consciously working on recyclability and reusability to meet circular economy goal. Fluoropolymers play an important role in achieving EU Green Deal objectives and UN Sustainable Development Goals (UN SDG) because of their vital use in Lithium-ion batteries, Green hydrogen, Fuel Cell, Solar and Wind energy. No new-age technologies are possible without the use of fluoropolymers. Restriction on the use of fluoropolymers would adversely impact implementation of these technologies crucial for planet's future as well as in all existing applications vital for the society. Considering the benefits of fluoropolymer applications to environment and society, low PFAS emissions and initiatives being taken by the processing industry to further minimize emissions and closing the loop by implementing circular economy wherever possible, we request for a **complete exemption of fluoropolymers from the PFAS restriction proposal.**

Fluoropolymers processed by us:

PTFE (3500tons/year)

PFA

PCTFE

Service application industries:

Aerospace

Transportation

Industrial

Chemical

Oil & Gas

Semiconductors

Automotive

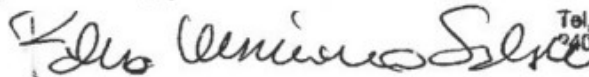
Food industry

Medical

Sincerely yours,

Name and signature:

Mr. P6



FLUORSEALS s.p.a.

Via Tribolina, 20/22

Tel. 035.4492811 - Fax 035.831410

24064 GRUMELLO DEL MONTE (BG)

Reg. e Partita IVA: 00593110166

Company name and address:

Fluorseals s.p.a. via Tribolina 20-22 - 24064 - Grumello del Monte (BG), Italy



19, Z.A. Grange Neuve
38790 DIEMOZ France
Tél. 33 (0) 478 962 237
www.isoflon.com

E-mail : isoflon@isoflon.com



Date: 15/09/2021

Kind attention:

Mr.	P1	- Netherlands	restrictiePFAS@rivm.nl
Dr.	P2	- Germany	ChemG@baw.bund.de
Mrs.	P3	- Sweden	E1
Mr. Toke Winther		- Denmark	towin@mst.dk
Mr.	P4	- Norway	E2
Mr.	P5	- ECHA	E3

Through: fluoroseals S.p.A - Via Tribolina, 20/22 - 24064 Grumello del Monte (BG) - Italy

The members of fluoroseals S.p.A mainly focus on processing of Fluoropolymers, part manufacturing and its applications, the involvement of downstream users in PFAS process.

Subject: PFAS restriction proposal & request for exemption of FLUOROPOLYMERS

Reference: PFAS - Registry of restriction intentions until outcome (RoI) dated 15th July 2021

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S.A.S AU CAPITAL DE 75 000 € - APE 2229 A - RCS VIENNE B 307 179 093 - N° TVA : FR 43 307 179 093

CONDITIONS DE VENTE - 1°) JURIDICTION : Tout litige ou contestation sont exclusivement du ressort du Tribunal de commerce du siège de l'entreprise. Les différents modes de règlement, ainsi que le lieu de livraison ne peuvent, en aucun cas, porter dérogation à cette clause de juridiction.
2°) RÉSERVE DE PROPRIÉTÉ : Conformément à nos conditions générales de vente, la loi n° 80.335 du 12 mai 1980 relative à la clause de réserve de propriété est applicable aux marchandises décrites sur le présent document, celles-ci restant en effet notre propriété jusqu'au paiement complet. TVA payée sur les débits.
3°) RÈGLEMENT : Le non-retour de cette facture dans le délai de 8 jours implique une connaissance définitive du bien-fondé de cette facturation, et toute somme non réglée dans le délai indiqué entraînera une pénalité égale à une fois et demie le taux de l'intérêt légal par mois de retard après mise en demeure. Pour un règlement anticipé aucun escompte n'est accordé. Ces conditions sont sous réserve de conditions particulières stipulées dans cette facture. Indemnités forfaitaire de recouvrement 40 €

The fluoropolymer downstream user industry acknowledges the concerns regarding PFAS emissions due to the use of fluoropolymers and end of life processes. We wish to assure the authorities and EU Member States that, we are implementing Best Available Technologies to ensure reduction in PFAS emissions in a systematic way and eventually eliminating them to achieve EU's sustainability goals. Parallely, we are consciously working on recyclability and reusability to meet circular economy goal.

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Considering the benefits of fluoropolymer applications to environment and society, low PFAS emissions and initiatives being taken by the processing industry to further minimize emissions and closing the loop by implementing circular economy wherever possible, we request for a **complete exemption of fluoropolymers from the PFAS restriction proposal**.

Fluoropolymers processed by us: pure and filled PTFE

Service application industries: Use in all industries with demanding applications requiring several properties at the same time such as: temperature resistance, chemical resistance, low friction, non-stick, electrical insulation, inertia. A few examples :

- food processing to ensure non-stick properties, facilitate cleaning and avoid contamination problems
- medical to work in demanding environments requiring stable and inert materials
- chemical to ensure safety by providing high resistance to chemical corrosion
- electrical to insulate due to its high dielectric strength
- mechanical to reduce the coefficient of friction and therefore limit the use of lubricants in moving assemblies
- aeronautics and space to work in applications requiring reliable products, simultaneously resistant to high temperatures and aggressive environments

Lastly, our machining wastes are recycled

Sincerely yours,

Name and signature

Ti1

P7



Mr
Ti1

P6



Company name and address

ISOFLON
ZA Grange Neuve – 38790 DIEMOZ - France

S.A.S AU CAPITAL DE 75 000 € - APE 2229 A - RCS VIENNE B 307 179 093 - N° TVA : FR 43 307 179 093

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IVR S.p.A.

Sede Amministrativa: Via Brughiera III n.1 Località Piano Rosa - 28010 Boca (NO)

Sede Legale: Via Francesco Melzi d'Eril n.7 - 20154 Milano (MI)

e-mail: vendite@ivrvalvole.it / sales@ivrvalvole.it

website : www.ivrvalvole.it

Tel. [REDACTED]

Fax [REDACTED] - 93

Capitale Sociale € 2.300.000,00 i.v.

Registro Imprese: Milano - R.E.A. Milano n. 1918135

Codice Fiscale e Partita IVA: IT 06829530960

Cod. Destinatario F.E.: A4707H7

Reg. AEE: IT18110000010974



Data / Date

2021.09.13

Mr. P1 - Netherlands
restrictiePFAS@rivm.nl

Dr. P2 - Germany
ChemG@baua.bund.de

Mrs. P3 - Sweden
E1

Mr. Toke Winther - Denmark
towin@mst.dk

Mr. P4 - Norway
E2

Mr. P5 - ECHA
E3

Through: fluoroseals S.p.A - Via Tribolina, 20/22 - 24064 Grumello del Monte (BG) - Italy

The members of fluoroseals S.p.A mainly focus on processing of Fluoropolymers, part manufacturing and its applications, the involvement of downstream users in PFAS process.

Subject: PFAS restriction proposal & request for exemption of FLUOROPOLYMERS

Reference: PFAS - Registry of restriction intentions until outcome (Rol) dated 15th July 2021

Dear Sir/Madam,

With regards to Registry of Intention (Rol) filed by 4 EU Member States (Germany, the Netherlands, Sweden, and Denmark) & Norway for the restriction of PFAS, we, a member of fluoropolymer downstream user industry, hereby, would like to share some salient facts related to the importance of fluoropolymers, critical functionalities, performance and benefits of its applications to society, while acknowledging concerns regarding PFAS emissions related to the use of fluoropolymers and their end of life.

Registry of Intention for PFAS restriction was announced by ECHA on 15th July 2021, to prepare a restriction proposal for PFAS. Fluoropolymers are also included in the scope. The restriction proposal is intended to be submitted to ECHA by 15th July 2022.

Fluoropolymers are a distinct subset of PFAS and are inherently safe, non-mobile, non-bio accumulative and non-toxic. Fluoropolymers are different from other PFAS as they **do not share the toxicological and environmental profiles** associated with PFAS of concern. Fluoropolymers have **unique set of physicochemical properties**, they meet OECD polymer of low concern criteria, and are considered to have **insignificant environmental and human health impact**.

Fluoropolymers ensure safety, reliability, durability and critical performance in numerous technologies, industrial processes and everyday applications that are important for human health, safety, and the environment. With a unique



IVR S.p.A.

Sede Amministrativa: Via Brughiera III n.1 Località Piano Rosa – 28010 Boca (NO)

Sede Legale: Via Francesco Melzi d'Eril n.7 – 20154 Milano (MI)

e-mail: vendite@ivrvalvole.it / sales@ivrvalvole.itweb: www.ivrvalvole.it

Tel. [REDACTED]

Fax +39 0322 888892 - 93

Capitale Sociale € 2.300.000,00 i.v.

Registro Imprese: Milano – R.E.A. Milano n. 1918135

Codice Fiscale e Partita IVA: IT 06829530960

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Considering the benefits of fluoropolymer applications to environment and society, low PFAS emissions and initiatives being taken by the processing industry to further minimize emissions and closing the loop by implementing circular economy wherever possible, we request for a **complete exemption of fluoropolymers from the PFAS restriction proposal**.

Fluoropolymers processed by us: PTFE P101E

Service application industries: Seats for Ball Valve

Sincerely yours,

Boca, 2021/09/13

IVR S.p.A.

Ti1

P6

Company name and address

IVR S.p.A. - Via Brughiera III n.1 Località Piano Rosa – 28010 Boca (NO)



ROBECCHI ARTICOLI TECNICI S.r.l. - Via Tribolina, 25
24064 GRUMELLO DEL MONTE (BG) - ITALY
Reg. Impr. di BG - C. F. e P. IVA: 00843220161
capitale sociale € 90.000 i.v.
Tel. (+39) 035-832422 - Fax (+39) 035-833391
www.robecchi.com robecchisas@robecchi.com

Date: 09 September 2021

Kind attention:

Mr. P1 - Netherlands
Dr. P2 - Germany
Mrs. P3 - Sweden
Mr. Toke Winther - Denmark
Mr. P4 - Norway
Mr. P5 - ECHA

restrictiePFAS@rivm.nl
ChemG@bawa.bund.de
E1
towin@mst.dk
E2
E3

Through: fluorseals S.p.A - Via Tribolina, 20/22 - 24064 Grumello del Monte (BG) - Italy

The members of fluorseals S.p.A mainly focus on processing of Fluoropolymers, part manufacturing and its applications, the involvement of downstream users in PFAS process.

Subject: PFAS restriction proposal & request for exemption of FLUOROPOLYMERS

Reference: PFAS - Registry of restriction intentions until outcome (RoI) dated 15th July 2021

Dear Sir/Madam,

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Fluoropolymers processed by us:

PTFE (Polytetrafluoroethylene)

Service application industries:

All

Sincerely yours,

Name and signature

Eng. P6 - Legal representative.....

Company name and address

Robecchi Articoli Tecnici Srl – Via Tribolina 25, 24064 Grumello del Monte (BG), Italy

Robecchi
ARTICOLI TECNICI s.r.l.
Via Tribolina, 25
24064 GRUMELLO DEL MONTE (BG)
Cod. Fisc. e Partita IVA: 00843220161



Date: 06/09/2021

Kind attention:

Mr. P1 - Netherlands

restrictiePFAS@rivm.nl

E1

P2

E2

P3

E3

involvement of downstream users in PFAS process.

restriction intentions until outcome (RoI) dated 15th July 2021

for the restriction of PFAS, we, a member of fluoropolymer downstream user industry, hereby, would like to share some salient facts

Registry of Intention for PFAS restriction was announced by ECHA on 15th July 2021, to prepare a restriction proposal for PFAS. Fluoropolymers are also included in the scope. The restriction proposal is intended to be submitted to ECHA by 15th July 2022. Fluoropolymers are a distinct subset of PFAS and are inherently safe, non-mobile, non-bio accumulative and non-toxic. Fluoropolymers are different from other PFAS as they **do not share the toxicological and environmental profiles** associated with PFAS of concern. Fluoropolymers have **unique set of physicochemical properties**, they meet OECD polymer of low concern criteria, and are considered to have **insignificant environmental and human health impact**.

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Fluoropolymers processed by us:

PTFE.....

Service application industries:

MERLO S.p.A. Industrie Metalmeccaniche, Manitou Group, Dieci S.r.l., Hydraforce Hydraulic Limited GB, J.C.B. Ltd, Rototilt Group AB, Engcon Nordic AB, Hawe Hydraulik SE, Bucher Hydraulics Spa,

Sincerely yours,

Name and signature

P4

A handwritten signature in blue ink, reading "Memo Boldi".

Company name and address

VALVOLE ITALIA S.r.l. via Lenin, 39 41012 Carpi (MO) Italy