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Sent: Friday 12 May 2023 13:50
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Subject: Please help: PFAS restriction proposal which includes all fluoropolymers
Attachments: PBR_599742_pil_170423_extsigned_CONflon® PVDF_DC-3000_P.pdf; PBR_599745_pil_170423_extsigned_CONflon® PTFE_LM-PDR213_P.pdf; PBR_599744_pil_170423_extsigned_CONflon® PFA_7440_P.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Dear All,

I am turning to you because an initiative from five MS on a hard restriction of PFAS and all Fluoropolymers has been submitted to ECHA

(<https://echa.europa.eu/de/registry-of-restriction-intentions/-/dislist/details/0b0236e18663449b>) which has implications for the office imaging equipment industry (machines and cartridges may use for example small amounts of PTFE, PFA and PVDF) and far beyond (Medical-, Pharmaceutical-, Renewable Energy-, Semiconductor-, Aerospace-, Automotive-, Chemical-, Nuclear Power-Industry and many other industries.

The current proposal is even rendering impossible important EU initiatives such as:

EU strategic initiatives	Examples of fluoropolymer use cases
A European Green Deal: Striving to be the first climate-neutral continent ← REPowerEU ←	• Wind energy: release film for blades, seals for power train, cable connectors. • Photovoltaic: back sheet, cables, connectors. • Green Hydrogen: Ion-exchange membrane. • E-mobility: Li-Ion battery binder and separator coating, cables, membranes. • Heat pumps: Refrigerants, tubes, membranes. • Nuclear power: Seals, pipes, valves.
A Europe fit for the digital age: Empowering people with a new generation of technologies ← European Chips Act ←	• 5G data Transmission: Cables, Copper cladded laminates (CCL) for antenna. • Semiconductor: Wafer Carriers, Tubes, Valves, liners. • Gas diffusion electrodes.

Whenever Fluoropolymers are used in technical- and industrial applications there are no existing alternatives to replace such Fluoropolymers because of their unique properties like:

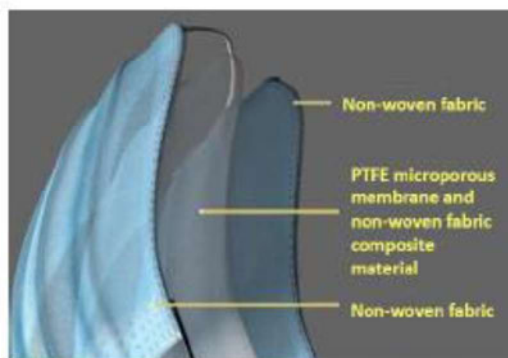
- Excellent chemical resistance
- Excellent weather resistance
- No ageing , non-brittle
- Excellent dielectric properties
- Broad service temperature range (-250 to +250 °C)
- High stability of frequency
- Non-flammable (LOI 95, low generation of smoke)
- No absorption of moisture

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Eine Marke der Delacomp AG

PTFE, PFA and other fluoropolymers are considered polymers of low concern (PLC) by the OECD. Most PTFE grades are for example in accordance with FDA , EC 1935/2004 , EC 10/2011 and EC 2032/2006 and are even used in stents and FFP2 masks:



Replacement of blood vessels



Protective (FFP2) face masks against COVID viruses

As you can see in the attached test report examples, standard fluoropolymers like PTFE and PVDF, even if they have been reprocessed like the PFA grade tested enclosed, do not contain any targeted PFAS.

Please help in:

- Making a clear differentiation between PFAS and Fluoropolymers and
- exempting all Fluoropolymers from the proposed restriction.

Thank you very much.

Regards

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