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Consultation on PFAS

Dear Madam, dear Sir,

Thank you for your efforts to ensure a safe and healthy future in the European Union and beyond!
This is also our company's goal: Baelz, with its motto "Want to save energy? Baelz offers solutions" and with our mission statement "Nature & Technology in Harmony", we have been a partner to our customers for sustainability and energy efficiency for decades.

We are about 150 employees in a group of 5 companies in Germany, France, Austria and China. The Baelz family business has been in existence since 1896 and has been family owned and managed ever since, now in its fourth generation.

Our program is uniquely broad, Baelz components and systems are used wherever heat is to be controlled, converted and transferred. Examples include the district heating network of Paris/France, where more than 4000 Baelz heat transfer systems ensure safe heating and domestic hot water production, or textile machines in China, where our control valves and controllers are highly valued for their durability and reliability.

A new addition to our product range, based on our experience in system engineering, are absorption chillers, which turn heat into cold in a highly efficient process that is completely climate-friendly and sustainable. Waste heat that would otherwise be lost is used - and solar heat can also be used for cooling.

We have closely followed the discussion on the planned ban of more than 10,000 PFAS substances and have exchanged information with our association partners through our membership in VDMA and AGFW. Today we know: PFAS compounds remain in the environment, decisive action is required here. This can only happen at EU level so that a sustainable effect can be achieved.

However, if PFAS and FPM/FKM were to be banned in the course of these efforts, this would have serious consequences for a large number of our components and systems. A particular focus is on our control valves and jet pumps/ejectors, which are sold as individual components but are also installed in our systems. Furthermore, seals are affected, which are installed almost everywhere, because Baelz, as a specialist in the field of water vapor, has high challenges here in terms of pressure and temperature.

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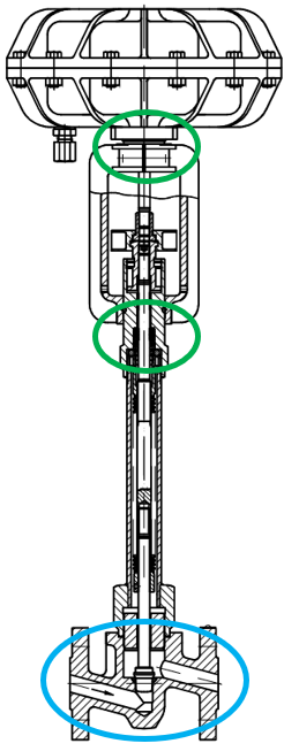
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From our point of view, however, one particularly decisive point has not yet been sufficiently acknowledged in the statements made so far: Many parts we use from the PFAS spectrum are never in contact with any food or drinking water. Moreover, the heat transfer media that are controlled and converted are kept in recirculating systems and do not reach the outside.

An example that is typical for such an application:



This is a control valve baelz 356 with pneumatic actuator. Marked with green: Here, packings made of PTFE are mounted, for stem sealing - once in the pneumatic actuator (top) and once on the valve itself (bottom). Below, marked in blue, the medium to be controlled is going through. It does not come into contact with the PTFE at all!

Admittedly, there are other applications that require such contact - but this also does not mean that it is always problematic. A precise differentiation is necessary, and possible!

At the end of the service life of those components where PFAS substances are used - often for many decades - a secured disposal of these components takes place, if only because of the material value of the parts used. These are cast iron or steel, aluminum, copper or stainless steel. The corresponding packings and gaskets are also disposed of correctly.

Here lies a crucial problem in the presentation of these facts: The use of PFAS substances is very broad. Certainly, action is needed to achieve the above goals, and action is needed now. However, a ban on those materials whose use poses no danger whatsoever is completely inappropriate.

On the one hand, it is unnecessary (see examples above, no or hardly any contact with media to be protected), and on the other hand, it would be counterproductive, because otherwise designs that have been tried and tested for decades would have to be redesigned at great expense, or - mostly inadequate - substitute materials would have to be tested, qualified and certified. This would also result in a decisive

competitive disadvantage compared to manufacturers from non-EU countries.

Baelz, along with the VDMA association and our industry partners, would be happy to be involved in all further coordination and contribution in this process.

Thank you very much for your consideration of our statement!

Best regards

A handwritten signature in blue ink, reading "Florian Baelz". The signature is written in a cursive, flowing style.

Florian Baelz
Managing Partner