



Fluoropolymers and the proposed universal PFAS REACH Restriction

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Fluoropolymers Product Group (FPG)

The **Fluoropolymers Product Group (FPG)** represents Europe's leading fluoropolymer producers and experts.

As the voice of the industry across Europe, the FPG advocates for a balanced regulatory environment based on scientific facts to ensure that European industries remain competitive and sustainable.

Part of PlasticsEurope, the group's members are **3M, AGC, Arkema, Chemours, Daikin Chemicals, DuPont, Gujarat Fluorochemicals, Honeywell, W. L. Gore & Associates, and Solvay.**

Fluoropolymers do not pose a risk to human health or the environment as they are non-toxic, not bioavailable, non-water soluble, non-mobile and do not bio-accumulate.

They present a different toxicologic and eco-toxicologic profile from PFAS that can be considered a concern.

All PFAS are not the same

- The proposal makes limited reference of the fact that fluoropolymers have very different hazard profiles to other PFAS substances.
- Differentiation should be made between the broad family of PFAS according to their intrinsic properties, toxicological profile and critical uses.
- FPG member companies continue investigating and developing R&D programs for the advancement of fluoropolymer production technologies allowing for a transition away from using PFAS-based polymerization aids with reduced fluorinated residue levels and meeting all performance requirements.
- However, during this transition, it may be necessary to continue using fluorinated polymerization aids until non-PFAS polymerization aids are developed. Therefore, relevant derogations for fluoropolymers should be provided.

Fluoropolymers are used in critical applications that help deliver strategic European climate and industrial objectives. They are an indispensable driver of the European Green Deal and Digital transition

Fluoropolymers and EU strategic objectives

- Fluoropolymers are used in critical applications including smart mobility, clean energy and sustainable industry, semi-conductors/electronics...
- Many critical applications where fluoropolymers are used are not even proposed for derogation and will be banned 18 months after entry in to force.
 - ✓ e.g. chemical process industry, pharmaceutical manufacturing, aerospace, military and defense, semiconductor manufacturing, water and wastewater treatment...
- Periods for time limited derogations are not substantiated by a strong evidence base and are in many cases inadequate.
- The proposed restriction creates general uncertainty that would undermine investment decisions and innovation in critical applications that help deliver strategic EU ambitions (fight against climate change, European Green Deal, the Chips Act, Hydrogen Strategy, and Sustainable and Smart Mobility Strategy).

Alternatives

The dossier submitters state that a move away from using fluoropolymers to alternative materials in many applications can be made.

The evidence base to support this opinion is limited and does not reflect the reality of the stringent performance and safety requirements that are the reason fluoropolymers are used in so many critical applications.

- Inadequate information on alternatives could open the door for regrettable substitution.
- Alternatives that do not perform at the same specification as a fluoropolymer, may be potentially hazardous, less durable and as such would mean applications are unable to meet stringent safety standards.
- During the REACH restriction process, alternative must be assessed for their risks to human health and the environment, their availability, but also their technical and economic feasibility.

Life-cycle concerns

- FPG acknowledges regulatory concern related to emissions during manufacturing and at End of Life (EoL).
- All FPG members have committed to responsible manufacturing principles and already implement them.
- A total ban on fluoropolymers is not proportionate. The concerns of persistence raised in the restriction proposal can be appropriately managed through the implementation of responsible manufacturing and EoL risk-management practices.

A total ban on fluoropolymers is not proportionate. Given their benign hazard profile, a general derogation for fluoropolymers should be provided in the proposal.