

Customer Opinion Letter

Response Opinion for PFAS Proposal (1)

We would like to express our greetings to the five countries proposing the ECHA and PFAS control draft on behalf of NATOR Lubrication (Shanghai) Co., Ltd. Our company has always made unremitting efforts to comply with domestic and international regulations, and continuously conducts strict self review of the compliance of products exported to the European Union. For a long time, we have supported the ambitious attempts of the European Union to reduce the risks caused by toxic and harmful substances, and have taken sincere practical measures to meet the requirements of EU chemical regulations, including REACH.

NATOR Lubrication (Shanghai) Co., Ltd. is an enterprise specializing in lubricating oil products. We use PFAS materials made of

PTFE as raw materials to achieve low friction coefficient of lubricating grease and long-term lubrication under high temperature conditions, as well as unique requirements for lubrication under certain special working conditions. Due to the necessity of this use and the longer time it takes for the substitute to pass certification, we request an indefinite extension for this application.

In this application, PTFE mainly achieves the necessary low friction coefficient, chemical stability, and wide usage temperature. Specifically, when operating under vacuum or extreme temperature conditions, it is necessary for the lubricating grease to simultaneously meet various performance requirements such as wide usage temperature and chemical stability. At present, the substitutes mentioned in the draft that exist in the market are unable to achieve (complete) substitution.

Please refer to Attachment [1] for relevant data.

Attachment [1]

Data of PTFE grease containing products

Item	Test data	Standard
Operating temperature range	-30-280	—
Wear scar diameter(40Kg, 1200rpm), mm	0.4	ASTM D4172
Oil separation(99°C, 30h), %	<4	ASTM D6184
Evaporation loss(204°C, 22h), %	<1	ASTM D2595
Dropping point, °C	NA	ASTM D2265

Response Opinion for PFAS Proposal (2)

We would like to express our greetings to the five countries proposing the ECHA and PEAS control draft on behalf of Anhui Xuhongte Fluorine Technology Co., Ltd. Our company has always made unremitting efforts to comply with domestic and international regulations, and continuously conducts strict self review of the compliance of products exported to the European Union. For a long time, we have supported the ambitious attempts of the European Union to reduce the risks caused by toxic and harmful substances, and have taken sincere practical measures to meet the requirements of EU chemical regulations, including REACH.

Anhui Xuhongte Fluorine Technology Co., Ltd. is an enterprise specializing in anti-corrosion products of steel lined polytetrafluoroethylene for chemical purposes. We use PTFE and PFAS

substances to meet the unique requirements of product resistance to strong acids and alkalis, as well as high temperature and permeability.

Due to the fact that PTFE is a necessary use for this purpose, there are no feasible alternatives/certification of alternatives requires a longer period of time. Therefore, we request an extension of at least 12 years for this application.

In this application, PTFE mainly achieves the necessary strong corrosion resistance, temperature difference stability, and non adhesion. Specifically, when the medium permeability is strong, as well as high temperature and negative pressure conditions, the component needs to meet the requirements of non deformation, non aging, and no leakage. At present, the substitutes mentioned in the draft that exist in the market are unable to achieve (complete) substitution.

Relevant data can be found in the attachment.

Attachment

Characteristics of PTFE isobaric tubes

Item	Characteristic
Temperature resistance	High temperature resistance: 260°C, Low temperature resistance: -29°C
Corrosion resistance	Resistant to almost all corrosive chemical media such as acid, alkali, salt, strong oxidants, organic solvents, etc
Pressure resistance	High pressure resistance: 3.1MPa(ordinary temperature), Negative pressure resistance: full vacuum
Impermeability	Through specialized processes, PTFE raw materials are processed into lining materials with sufficient crystallinity and thickness

Response Opinion for PFAS Proposal (3)

On behalf of Jiangsu Fuhao Anticorrosive Technology Co., Ltd., we would like to express our greetings to the five countries proposing the ECHA and PFAS control draft. Our company has always made unremitting efforts to comply with domestic and international regulations, and continuously conducts strict self review of the compliance of products exported to the European Union. For a long time, we have supported the ambitious attempts of the European Union to reduce the risks caused by toxic and harmful substances, and have taken sincere practical measures to meet the requirements of EU chemical regulations, including REACH.

Jiangsu Fuhao Anticorrosive Technology Co., Ltd. is an enterprise specializing in chemical steel lined polytetrafluoroethylene anti-corrosion products. We use PTFE and PFAS substances to meet the unique

requirements of product resistance to strong acids and alkalis, as well as high temperature and permeability. Due to the fact that PTFE is a necessary use for this purpose and there are no viable alternatives/certification of alternatives requires a longer period of time, we request an extension of at least 12 years for this application.

In this application, PTFE mainly achieves the necessary strong corrosion resistance, temperature difference stability, and non adhesion. Specifically, when the medium permeability is strong, as well as high temperature and negative pressure conditions, the component needs to meet the requirements of non deformation, non aging, and no leakage. At present, the substitutes mentioned in the draft that exist in the market are unable to achieve (complete) substitution.

Relevant data can be found in the attachment.

Attachment

Characteristics of PTFE lined pipes

Item	Characteristic
Corrosion resistance	Any type, concentration of acid, alkali, salt, strong oxidant, organic solvent, and all other highly corrosive chemical media (except for high-temperature molten alkali metals, turbulent liquid or gaseous fluorine, certain halides ClF_3 , BrF_3 , IF_5 , OF_2)
Temperature resistance	-29~260°C
Pressure resistance	ordinary temperature, 3.1MPa; 260°C, 1.7MPa