



TUNAP GmbH & Co. KG

Bürgermeister-Seidl-Straße 2
D-82515 Wolfratshausen

P.O. Box 1640
D-82506 Wolfratshausen

Phone +49 8171 1600 - 0
Telefax +49 8171 1600 - 40

■@tunap.com

Your Contact
Daniel Eisenschmid
E-Mail
■@tunap.com

Extension
Phone ■

Page 1 of 2

21. September 2023

Proposed Restriction: Per- and Polyfluoroalkyl Substances-Annex XV

Dear Sir or Madam,

TUNAP GmbH Co. & KG respectfully submits the following comment to the European Chemicals Agency proposed restriction on per- and polyfluoroalkyl substances (PFAS) published on February 7, 2023.

We appreciate cordially the provided opportunity.

Introduction

The TUNAP GROUP headquartered in Wolfratshausen, Germany is an european manufacturer of aerosols, lubricants, and cleaners for industrial and technical applications. With innovations and reliable products from its own development and production as well as a comprehensive international direct sales organization, TUNAP is a successful and indispensable partner of the industry. With its production facilities, a large network of distributors supported by highly qualified and motivated employees, TUNAP is in many markets worldwide present.

TUNAP supports the preservation of our natural resources and apart from the environmental aspect, continue to develop in the areas of economic and social sustainability.

Concernment

As a chemical producer, our activities are pertinent to a wide variety of chemical substances, in particular hydrocarbon-based solvents, and fluids, which must be stored and processed in a closed system, to ensure the health of employees and not to pose a risk to the environment.

The use of fluoropolymers like PTFE und PVDF in this context is crucial to seal the various parts of our systems and thus prevent leaks and associated emissions into the environment due to their very special properties like temperature tolerance, chemical and high wear resistance, durability, low coefficient of friction and high media compatibility etc., which have not yet been demonstrated by any other material reasonable for an industrial use and technical functions.

After a rough estimate, TUNAP expects to have up to thousands number of mentioned fluoro-polymers in different form of sealings in the affected production facilities as well as in the sector of transport, including but not limited to:

- Air compressors
- Nitrogen generators
- Refrigeration dryers
- Filling machines
- Sealing machines
- packaging machines
- Condensers
- Storage tanks and tanker coupling adaptors
- Pumps
- Machine and pipe fittings
- Regulators and valves
- Thread seals and other kind of sealings
- Pipe networks
- Homogenizer, mixers, roller mill machines und industrial kneaders

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Page 2 of 2

Comment

The use of fluoropolymers can afford the environmental protection as well as a safe transport and sustainable handling of the critical materials which may result in a potential damage. Implementing the proposed restrictions applied to the fluoropolymers will cause far-reaching technical issues and expecting socio-economic consequences for our branch of industry. TUNAP acknowledge ECHA for regulating chemicals and protecting the environment and human health and also value the proposed restriction. However, as set out for the mentioned reasons, TUNAP asks ECHA to consider the described issues for adopting the further approaches.

Many Thanks in advance.

With kind regards,

TUNAP GmbH & Co. KG



Daniel Eisenschmid
21.09.2023 10:43:25 [UT]

i. V. Daniel Eisenschmid
Head of Integrated Management Systems