

Til: ' E1 ' (E1)
Cc: restrictiePFAS (E4)
Fra: restrictiePFAS (E4)
Titel: RE: Electrolux Group - Question on PFAS dossier / lubricants section Annex E
Sendt: 25-07-2023 10:31

Dear Mrs. Carrier,

Thank you for your questions. I've taken over the tasks of P1 for this dossier, so I'll try to answer your questions as clearly as possible.

1. We would like to understand how "harsh conditions" is defined? As we use PFAS-based lubricants in ovens, would oven conditions (e.g. T° ~ 250-280°C, Patm) qualify as "harsh conditions"?

We have not laid down a strict definition of harsh conditions, as sometimes the combination of certain conditions may be considered to be harsh (e.g., combination of a high temperature in a high pressure and low pH environment), while these individual conditions on itself may not be seen as harsh. The specific combination of conditions sometimes asks for alternatives that may not have been (fully) developed yet. In your specific example (moderately high temperature conditions), alternatives may already be available. It would be much appreciated if you could sent in information on these uses, and don't assume to fall under the proposed derogation.

2. We would like to also understand how "safe functioning and safety equipment" is considered in the dossier proposal? Do the Submitters refer to an exhaustive list of safety standards or other?

No, we do not refer to an exhaustive list of safety standards. This proposed derogation is meant for equipment that has a long life-span in critical situations (with regards to safety) for which not alternatives are (fully) developed yet. Please feel free to submit information to the consultation, and don't assume to fall under a derogation.

For both questions, please also look at the explanatory note for 5s in the Draft entry text (see page 11 of the main report: <https://echa.europa.eu/documents/10162/f605d4b5-7c17-7414-8823-b49b9fd43aea>). This states the following:

5s) The derogation relates to the use of lubricants in industrial or professional settings for operations and equipment that require performance under harsh conditions (very high or low temperatures, very high or low pressure, chemical resistance, resistance to radiation etc.) or for safe functioning and safety of equipment (e.g. circuit breakers and switchgear that has to work reliably when required even if not being used for years).

I hope this helps you in your response to the consultation. Please be aware that substantiation of claims made in your response to the consultation need to be substantiated.

Met vriendelijke groet / Kind regards,
P2

P2 de P3 , MSc

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From: P4 < E1 >
Sent: dinsdag 25 juli 2023 09:09
To: P1 < E3 >
Cc: restrictiePFAS < E4 >
Subject: Electrolux Group - Question on PFAS dossier / lubricants section Annex E

Dear Mr. Beekman,

I hope this email finds you well. I am contacting you, as I am the policy expert for the [Electrolux Group](#), a Swedish company manufacturing home appliances, as such, we are members of [APPLiA Europe](#).

I am currently dealing with the PFAS dossier, on which we will, as a Group, provide our feedback to the ongoing public consultation from ECHA.

We came across the **lubricants section**, or chapter, of the dossier proposal, and while trying to provide our expertise on such a matter, we have two critical questions in order to be able to assess the derogation proposal accordingly.

For instance, the next paragraph on PFAS-based lubricants states (p.477 Annex E):

According to stakeholders, PFAS-based lubricants are used in many sectors in situations where they are superior in terms of technical performance under extreme/harsh conditions compared to other lubricants and/or where other types of lubricants would not be technically feasible. A description of technical functions of PFAS-based lubricants is given in Annex A.3.15.1. Key functions that are often mentioned are: Temperature resilience (large temperature service range), chemical inertness and a very low coefficient of friction.

(...) (p.483 Annex E)

Concluding remarks

PFAS-based lubricants are superior in terms of technical performance under harsh conditions (very high or low temperatures, very high or low pressure, strong chemical conditions like strong acids/bases or corrosive chemicals, oxidizing or reducing substances, radiation etc.) compared to other lubricants and/or where other types of lubricants would not be technically feasible. Further, they are also used for safe functioning and safety in e.g. circuit breakers and switchgear (long lifetime) and according to stakeholders also in food industry (avoid chemical contamination due to inertness). No alternatives to the use of PFAS base oils and micro-powder PTFE under harsh conditions or for safe functioning and safety of equipment have been identified. As PFAS-additives (other than micro-powder PTFE) and PFAS-based solvents are the only additives and solvents that are compatible with PFAS-base oils, they must follow the PFAS base oils in terms of a ban or derogation. The Dossier Submitters, therefore, conclude based on information from CfE, literature review and stakeholder consultations, that the evidence is sufficiently strong that technically feasible and economically feasible alternatives are unavailable for the quantities required for use in lubricants under harsh conditions or for safe functioning and safety of equipment and that the substitution potential is low.

For PFAS-based lubricants used under other conditions there is an indication that alternatives are available. This is exemplified for the use of micro-powder PTFE for lubrication of dry-film lubrication of bike chains and lubrication of door hinges and noise reduction in automotive. However, it is unclear to the Dossier Submitters, if alternatives are available for all uses PFAS based lubricants not applied under harsh conditions or for safe functioning and safety of equipment.

1. **We would like to understand how “harsh conditions” is defined? As we use PFAS-based lubricants in ovens, would oven conditions (e.g. $T^{\circ} \sim 250-280^{\circ}\text{C}$, P_{atm}) qualify as “harsh conditions”?**
2. **We would like to also understand how “safe functioning and safety equipment” is considered in the dossier proposal? Do the Submitters refer to an exhaustive list of safety standards or other?**

The answers to our herein above questions would greatly support us in understanding whether our PFAS-based lubricant usage would qualify, or not, to be considered under the 12-year derogation proposal.

I truly would appreciate your kind feedback, please do not hesitate in further contacting me in case it would be easier/faster via an e-meeting, or else. Also, do not hesitate in forwarding this email to relevant colleagues from the RIVM.

I thank you and wish you a great day,
Best regards,

P4

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