



Brussels, 2 June 2022

To: [REDACTED]

CC: [REDACTED], [REDACTED], [REDACTED]

European Commission

Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Unit F.1, REACH

Avenue d'Auderghem 45

1040 Brussels

Subject: C6 side-chain fluorinated transported intermediates under the POP PFOA Regulation and the REACH C9-C14 restriction

Dear [REDACTED],

I am writing to you, as Global Head of Product Stewardship, at [Archroma](#). Archroma is an EU producer of specialty chemicals for various markets, such as textile, paper, paints and home care. Our production of specialty chemicals includes C6 side-chain fluorinated polymers, mainly for industrial, professional, protective and high performance textiles.

Through this letter, I would like to voice concerns on our C6 side-chain fluorinated transported intermediates. These intermediates constitute the building blocks of C6 side-chain fluorinated polymers hereinabove mentioned.

These C6 intermediates contain PFOA- as well as C9-C14- related substances as impurities, for which maximum thresholds are set under the PFOA POP Regulation (20 ppm) and the REACH restriction on C9-C14 (10 ppm).

Importantly, Archroma is the only producer of C6 side-chain fluorinated polymers performing the entire production process (called telomerisation) within the EU (please refer to the production chart provided separately). The telomerisation plant is located in Gendorf, Germany.

Among Archroma's various C6 side-chain transported intermediates, [REDACTED]

[REDACTED] Both intermediates are registered under REACH as intermediates exclusively intended for use in industrial settings under Strictly Controlled Conditions (SCC).

Until July 2020 and the entry into force of the PFOA POP Regulation, they were supplied to European customers that were producing their own C6 side-chain fluorinated polymers.

Since July 2020, [REDACTED] representing a volume of [REDACTED] metric tons/year. [REDACTED] (less than [REDACTED] metric tons/year [REDACTED], use which is derogated under the PFOA POP Regulation.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] More importantly, it would increase the reliance of the EU industry on other producers, which may not apply SCC in their production processes.

Last but not least, we would like to underline that over the past months, Archroma conducted significant investments in order to strengthen its analytical capabilities for measurements of PFOA-related substances at its site in [REDACTED]. This enabled Archroma to obtain more reliable measurements compared to before. Based on these results, Archroma is in a position to propose lower thresholds for PFOA-related substances in C6 transported intermediates (except if requiring additional purification step) from 20 ppm down to [REDACTED].

With respect to C9-C14 related substances, work is also ongoing to develop tailored analytical measurements, with first results expected within the next months.

In summary, Archroma would like to share with you the following proposals:

Proposal for PFOA-related substances threshold in C6 side-chain transported intermediates:

- Lower threshold from 20 mg/kg (0,002 % by weight or 20 ppm) to [REDACTED] by weight or [REDACTED]
- New, specific threshold [REDACTED] for PFOA-related substances in C6 side-chain transported intermediates for the purpose to reduce the concentration of PFOA-related substances below the limit [REDACTED] by weight or [REDACTED] at another site.

Proposal for C9-C14 thresholds in C6 side-chain transported intermediates:

- New, specific threshold of [REDACTED] for C9-C14 related substances in C6 side-chain transported intermediates for the purpose to reduce the concentration of C9-C14-related substances below the limit of 10 mg/kg (0,0010 % by weight or 10 ppm)* at another site.

**Archroma will propose a lower threshold for C9-C14 related substances in C6 side-chain fluorinated intermediates as soon as the results of currently performed measurements become available.*

While we are submitting these proposals to you, we are fully aware of the difficulty of reopening established regulations and thresholds. We hope nonetheless for a constructive dialogue about a possible way forward, at your best convenience.



Please note that we have informed [REDACTED] from the Directorate-General for Environment (DG ENVI) about our concerns and proposals.

We would like to thank you for your consideration and stay at your disposal for any questions you may have.

Yours sincerely,

[REDACTED]

[REDACTED]

Tel: [REDACTED]

Email address: [REDACTED] [@archroma.com](mailto:[REDACTED]@archroma.com)

Attachment: C6 telomer products line (strictly confidential)