

General comments	
We strongly support the concepts of REACH to contribute to human life and the environment. We manufacture/development substrate materials for EEE. We propose derogations as it is a difficult material to replace. Please see the attachment.	
Specific Information Requests	
1	Sectors and subsectors •Electronics and semiconductors - Electronics •Transport - Use of PFASs in applications affecting the proper functioning related to the safety of vehicles, and affecting the safety of operators, passengers or goods, to the extent not addressed under other parts of this restriction (e.g. under lubricants, electronic equipment and TULAC) Product •Low loss substrate material
6-a	•Emissions :No in-house emission •PFAS name :Polytetrafluoroethylene (CAS RN :9002-84-0)
6-b	•Used in antenna substrate •Required properties -Low dielectric constant -Waterproof -Environmental stability •Typical structure (Electronics) CCL (Cooper clad laminates) Circuit board 5G base station CPE •Typical structure (Transport vehicles) CCL (Cooper clad laminates) Circuit board mill-wave radar
6-g	•PTFE has the lowest dielectric constant. Therefore, it has excellent high frequency performance. •Due to its properties such as heat resistance and low water absorption, PTFE can also be applied to devices that require high reliability such as infrastructure equipment. •By combining PTFE-based substrate materials with glass cloth and inorganic fillers, it is possible to satisfy all performance requirements for high-frequency circuit substrates with a dielectric constant of 3.0 or less and a dielectric loss tangent of 0.001 or less. The non-PFAS material has a dielectric constant of 3.0 or more and a dielectric loss tangent of 0.002 or more, which reduces the antenna efficiency and increases the loss, shortening the distance of radio waves and making it impossible to obtain a sufficient S/N ratio. •As mentioned above, it is a difficult material to replace, and we propose to provide a grace period of 5 years for electronics. •As mentioned above, it is a material that is difficult to substitute, and the automobile industry takes a long time to obtain certification, so we propose a grace period of 12 years.
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