



Vereniging CLP
Postbus 352
3740 AJ Baarn
Secretariaat:
Tel. 035-541 30 64
KvK nr. 32135283

Smilde, 21-9-2023

Re: CLP-HPG position on the restriction of PFAS

CLP-HPG is the Dutch Association of Pump Manufacturers and Suppliers.

Pumping liquids is fundamental to the smooth operation of life in all aspects. From the central heating and water supply in our homes, sewage and wastewater treatment in our cities, through extraction and processing raw materials to manufacture finished products – pumps and pumping systems play a fundamental role. Industrial applications can range from water treatment, food processing, chemical industry, oil & gas, mining, paper mills, fire-fighting, dredging, waste removal and many more. Also in future applications to help the green transition, which include transportation of hydrogen, geo-thermal, and green gases, pumps play a vital role.

PFAS materials are used in pumps to improve functionality, achieve higher performance and increase safety, mainly as sealings, bearings, cable sheaths, coatings, pump inserts and membranes.

Their unmatched chemical resistance, temperature resistance, unique tribological properties and the combination of these characteristics, make PFAS containing materials irreplaceable. No currently available alternative material guarantees the same performance, safety and lifetime.

CLP-HPG is highly concerned about the intended broad restriction of PFAS, as a ban of PFAS components in pumps will lead to not calculable risks regarding reliability and safety in many applications. A substitution with other, less or even not suitable materials would cause:

- quick failures and unreliable installations
- huge increase in cost of ownership
- higher energy consumption due to lower efficiency
- process upsets
- primary necessities of life such as water or food will no longer be taken for granted
- leach potentially harmful substances to the food and drink process
- leakage of aggressive, toxic or hot media to the environment and therefore causing more danger to the residents.
- final product safety issues.
- environmental impact and public health



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CLP-HPG supports regulatory framework that would restrict the release of PFAS into the environment. However, a general PFAS ban would increase environmental pollution through emissions and result in reduced performance (meaning reduced energy efficiency), durability and safety and decreased resource efficiency. The use of PFAS materials should remain possible however for those applications, where no alternatives are available and are not foreseeable in the next years. Furthermore, it has to be considered, that the use of PFAS in pumps is restricted to a professional and industrial environment, where a proper handling, use and disposal of the products can be ensured. A marking of PFAS containing products, could be an initial step for improving the collection, recycling and appropriate disposal, and should be adapted to ensure safe handling. Regulations should be proportionate and reflect a risk-based approach.

(*) The CLP was founded in 2008 by a number of initiators from the Dutch pump industry to promote the knowledge level of its members in an independent association and to be a platform for mutual contact. Currently the CLP has 37 member which covers the majority of the Benelux pump market.

The Holland Pump Group (HPG) has united Dutch pump manufacturers since 1949. Since 2001, membership has also been open to Dutch sales and service organizations of foreign pump manufacturers. The foreign parent organizations must be affiliated with EuroPump (the European umbrella organization) through their national trade association. Since January 1, 2022, the HPG has been part of the CLP association. The activities of the HPG are continued in a special department within the CLP.