

Comment on European Union about PFAS proposal

Issue□The permanent exemption application for a variety of fluoropolymers

Scope□PTFE,PVDF,FKM,PFA,FEP,ETFE.

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As practitioners of the fluorine chemical industry, we understand the PFAS restriction act made by the five EU countries for the purpose of environmental protection and human health, but we are somewhat confused about the wide range of substances restricted by the proposal. We think that the proposal has blurred the huge difference in toxicity between different types of fluorine-containing substances and exaggerated the harm of fluorine-containing substances. The following are our views on fluoropolymers in order to seek the possibility of exemption of fluoropolymers in the PFAS proposal. There are several reasons:

1.Fluoropolymers are necessary substances to achieve global environmental protection goals, to achieve the goal of "carbon peak" and "carbon neutrality" on schedule. Without the participation of fluoropolymers, it is impossible to achieve, because fluoropolymers have played an irreplaceable role in energy conservation and carbon reduction. For example, in terms of green energy: PVDF is an important raw material for lithium batteries; PVDF/THV/PTFE is an important raw material for photovoltaic modules; ETFE is an important raw material for energy efficient buildings and agricultural production. In addition, there are also important applications in environmental protection production and pollution control, such as PTFE film for air and water filtration, PTFE fiber dust bag in the coal power, cement industry dust filtration collection application.

2.Fluoropolymers are necessary substances for industrial development, scientific and technological progress and human progress. In advanced semiconductor, artificial intelligence, aerospace equipment, PTFE,PFA,FEP are important irreplaceable materials. In the production of mainstream industries, such as automobile manufacturing, shipbuilding, chemical equipment, etc., PTFE,PVDF,FKM,PFA,ETFE and other polymers have been deeply involved.

3.Fluoropolymer is an important substance to protect human health and life. In the field of medical equipment, PTFE,FEP,PFA,ETFE are widely used. In personal medicine, heart stents and artificial blood vessels made of PTFE have saved countless lives.

The above applications are determined by the superior properties of fluoropolymers themselves, and it is difficult to find alternative substances within the foreseeable period of time. If the application of PFAS is widely restricted, it is contrary to the EU's concern for environmental protection and life and health.

To say the least, for the harm that fluoropolymers may cause to the environment and human body, with the development of waste treatment technology, it is completely possible to avoid harmful substances entering the environment and human body. For example, in production, waste gas, waste water recycling and collection treatment. In the processing process, the technology of dust collection and recycling has been very advanced, which can completely

prevent the harm caused by fluoropolymers to the environment and the human body.