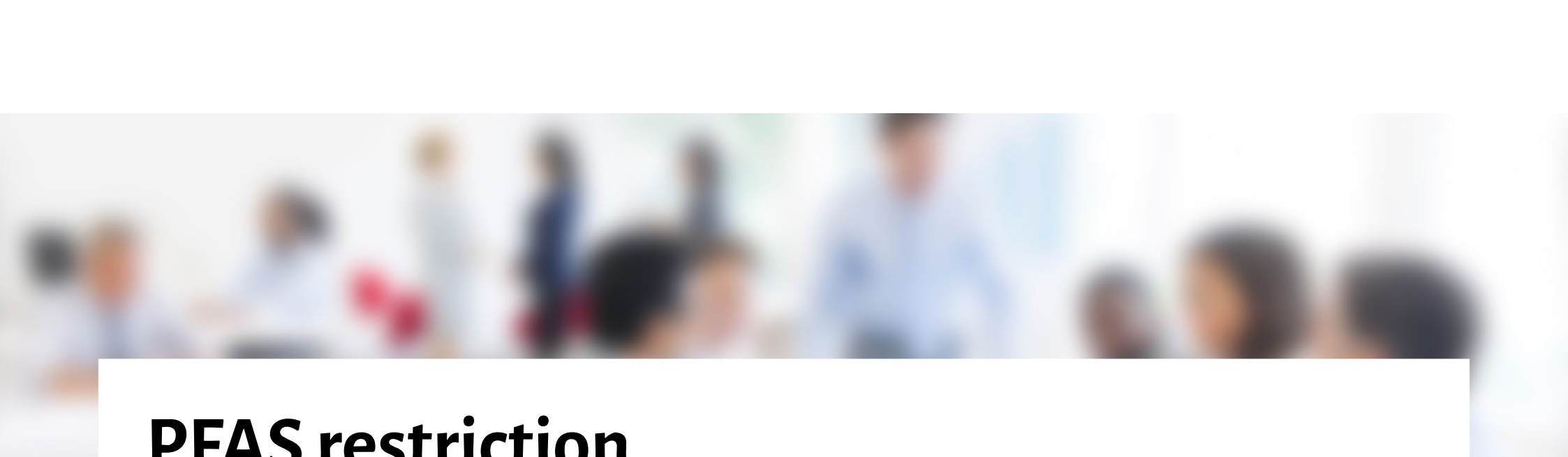




PFAS restriction

What does this mean for the technological industry?

Embracing technology
Embracing ambition

.AGORIA

Divided into 59 groups of companies

.AGORIA

BUILDING TECHNOLOGIES

Office & warehouse equipment
Windows, doors and facades
Lifts
Lighting
Home Automation
Individual Heating (CIV)
Heating, ventilation & cooling
Smart Building

ENERGY TECHNOLOGY

Multi-Energy

MANUFACTURING & PROCESS TECHNOLOGY

Gears and Transmissions
Compressors
Textile Machinery
Machine Construction & Components
Pumps & Valves
Industrial Ovens
Industrial Cooling
Food Equipment
Machines for the food industry, packaging and pharmaceutical industries
Industrial Automatisaton
Metal-Alliance.be

SAFETY, SECURITY & DEFENCE

Defence technology
Defence Equipment & Services
Agoria Fire Technologies
Agoria Security Technology & Solutions

CO-CREATION, CONTACTING & MATERIALS

Material Solutions
Non ferrous metals
Foundries
Metal Orodacts
Plastics Processing
Composites
Subcontracting
Additive Manufacturing
Contracting & maintenance
Technical Project Management and Assistance
Innovation, Design & Engineering Services
Assembly and Cranes

TRANSPORT & MOBILITY TECHNOLOGIES & SOLUTIONS

Commercial Vehicles & automotive suppliers
Smart Railway Solutions
Shipping Technologies
Smart & Sustainable Mobility
Bicycles and accessories
Agricultural & horticultural machinery and breeding equipment
Civil engineering machinery

AEROSPACE TECHNOLOGIES & SOLUTIONS

Aerospace
Agoria FLAG (Flemish Aerospace Group)
Aeronautic platform technologies
Space assemblies and technologies

MANUFACTURING DIGITAL

DIGITAL INDUSTRIES

Data centers
Digital Public Sector
Analytics & Information Management
Cloud & Datacenters
Geo Business & Drones
Mobile business
Information Security
Smart Cities
Digital Value and Agility
Digital Skills & HR
Reprobel/Auvibel, POS-systems

TELECOM INDUSTRIES

Investissements et infrastructures
Telecom et consommateur
Économie et société digitales

Agoria - the technological industry

- **Broad range of industry groups (59) ranging from:**
 - Building technologies
 - Energy technology
 - Manufacturing & process technology
 - Safety, security and defense technology
 - Co-creating, contracting, materials
 - Transport, mobility technology & solutions
 - Aerospace technology & solutions
 - Digital
 - Telecom
- **PFAS within the technological industry – used in multiple sectors/products:**
 - As a substance: cooling, lubricant, foam, coatings, ...
 - In an article: sealings, isolation, electronics, etc...
- **Can be hidden in complex products within the global value chain:**
 - Typical value chain can range between 100 > 1000 suppliers worldwide

> 2.100

member companies active in

the digital and manufacturing industry

324.000
people

Work in the
technology
industry

Potential consequence of restriction?

- **Broad restriction proposal > 10.000 substances with very limited proposed derogations (20 + potential 20 supplementary) for all types of uses of PFAS**
 - Timing of derogations limited to 6,5 or 13,5 years from EiF
- **Some challenges for to technological industry:**
 - Identifying PFAS within complex value chain
 - Finding substitutes for PFAS
 - Redesign of multiple products including potential redesign of production facilities
 - Applicable other legal frameworks – compliance can be challenging / conflicting
 - Maintenance, repair, remanufacturing, recycling challenges, ...
 - Limited time frame for derogations within complex products, value chains, ...
 - Level playing field: cost, efficiency, competitiveness, ...
 - ...
- **Often very specific per product/application/sector**

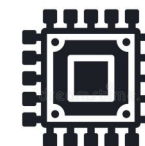
Feasibility of substitution ?

- **Multiple uses are linked to the specific technical features offered by PFAS, such as:**
 - Water, dust, oil repelling, ...
 - Heat resistance, heat exchange properties, ...
 - High pressure, ...
 - Lubrification capacity
 -
- **For certain use cases finding substitutes will involve more than “a drop in” substance:**
 - Product is designed taking into account the specific technical feature of the PFAS
-> complete redesign will be needed
- **For certain use cases substitutes will have a negative impact on different elements:**
 - Functioning of the product (energy efficiency, resource use, ...), process, complete review of product, complete replacement of product, ...
- **And for multiple applications no clear view on technically feasible substitutes available to date**

Some examples...



AIR COMPRESSOR
CONSTRUCTION



MICROCHIP



Filter
Air pollution contamination



Restriction proposal – what does it mean?

- **Provided exemptions (~20) are very limited and nearly not applicable to our broad range of impacted products**
- **Technical feasibility to substitute within proposed time limit (2025/2026) is impossible for multiple applications**
 - R&D for finding substitute
 - Re-design of product
 - Potential impact on production process
 - Compliance with other legal frameworks (ESPR, Safety, F-gas, ...)
 - ...
- **Important need for multiple exemptions for the technological industry:**
 - Current proposed generic timeframes for exemptions (6,5 or 13,5 years) will probably not be feasible given the challenges ahead

Even more challenges ahead...

- **PFAS definition with very low concentrations (25, 250 ppb / 50 ppm):**
 - Can this be measured with existing technology for that broad range of substances?
- **Restriction applies also to imported articles:**
 - How will Member States step up enforcement ?
- **What with maintenance, repair, remanufacturing and recycling with no drop in alternatives existing?**
 - Most products in the technological industry have a life time well beyond 20 years – are we accepting a shorter life time period due to this restriction?
 - This will have a huge impact for multiple products/installations/etc..
 - Derogation needed over the life-time of the equipment !!!
- **Lack of coherence with other legislative frameworks and EU ambitions:**
 - Chips act, Net Zero industry act, F-Gas, ESPR,, FIT for 55, material efficiency, ...

Conclusions

- **Most challenging restriction proposal:**
 - Wide range of substances and applications
 - Very limited exemptions both in number and time frame
 - Conflicting ambitions (Green Deal, net zero industry act, chips act,)

This can lead to important market failure and difficulties to achieve EU ambitions (Green Deal, industrial plan, chips act, net zero industry act ...)

- **Proper design of exemptions is needed taking into account reality within broad range of applications:**
 - Certainly generic exemption over lifetime for maintenance, repair, remanufacturing for products where no drop in alternative is existing but many other specific exemptions with feasible time frames
- **Not a 'one of a life-time stakeholder consultation': need of clear involvement of Belgian industry in design of restrictions needed to avoid market failure**

Need for more in-depth discussion in order to support exemptions for the technological industry in Belgium to avoid market failures

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Thank you

For your attention

 **AGORIA**