

RESPONSE TO THE ECHA PUBLIC CONSULTATION ON THE PFAS RESTRICTION PROPOSAL

September 2023

We welcome the European Union's ambition to minimise the presence of PFAS substances in the environment by limiting their use to critical applications where emissions can be limited, and value the opportunity to share our views on the restriction proposal on all PFAS.

The hereby contribution concerns the TULAC (Textile, upholstery, leather, apparel and carpets) sector, more specifically the use of technical textiles for filtration and separation application, which is covered by the derogation proposed under paragraph 5(e). We believe that this derogation is needed in order to give our industry sufficient time to complete the development and qualification work required to transition to PFAS-free chemistry.

From our perspective, the following aspects could be highlighted to justify this derogation:

1. C6-treated filtration and separation media are used in critical applications

Filtration media are used in critical applications contributing to purifying air to protect people and equipment in sensitive sectors (health, pharma, medical), as well as to ensure good functioning of gas turbines in the energy production sector. For some selected filtration applications, C6 are used in the production of filtration media for their low surface tension, which provides a chemical barrier that translates into unique properties in terms of water-repellency, as well as oil-repellency and/or glue-repellency. This chemical barrier also allows a reduced pressure drop and energy consumption during filter usage. In addition, it optimises filter converting, ensures the performance of the filter in challenging environments and extends the filter life-time.

2. No or only limited emissions throughout the filter life cycle

Whenever the use of C6 is needed in the production of filtration media, these substances are used in very small amounts. Generally, filtration media are produced by wet-laid processes and measurements from wastewater have shown very limited emissions (either non-detectable or close to the detection limit). In addition, similar measurements have been done showing negligible air emission releases from the drying process. Further down in the value chain, there is little, if any, risk of C6 getting airborne since C6 are well embedded in the filter matrix. Finally, regarding end-of-life treatments, the overwhelming majority of C6-based filters stem from professional and industrial applications. These filters are considered as hazardous waste and are, therefore, separately collected and incinerated at high temperatures in dedicated facilities.

3. The filtration sector needs time to shift to PFAS-free solutions

We support the reasons driving PFAS restrictions and thus started R&D activities years ago to develop PFAS-free alternatives for filtration applications. Our company has assessed a set of chemical alternatives. Even though the performance of those alternatives is not equivalent as that of C6, and they do not have oil-repellent properties, we are introducing these solutions to our customers for evaluation and qualification.

While the journey towards PFAS-free solutions has started, there is still significant testing and qualification work to be completed for media manufacturers, as well as for filter manufacturers and end-users. In this context, we strongly support the proposed transition period for filtration and separation applications. In our view, such transition period will give the filtration sector the time needed to shift towards PFAS-free solutions, whereas a full ban as of 2027 would jeopardise the supply of filtration media for critical and bring serious socio-economic implications.