

# DIGITALEUROPE



**A DIGITAL view on the  
PFAS restriction**

We represent over 45,000 businesses across Europe

# The voice of digitally transforming industries

1010  
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- platform services
- data analytics
- software & hardware
- cybersecurity
- telecoms
- semiconductors
- cloud technology



- Healthcare
- Manufacturing
- Finance
- Buildings
- Mobility

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41

NATIONAL  
ASSOCIATIONS

100

COMPANIES

# 60+ Categories of uses identified in electronics\*

## Application area

|                                 |
|---------------------------------|
| Coatings                        |
| Printed circuit boards          |
| High voltage/power applications |
| Cables and connectors           |
| Components                      |
| Mechanical applications         |
| Displays                        |
| Batteries                       |
| Fire prevention                 |
| Heat transfer                   |
| Chemical equipment              |
| Chemicals                       |
| Others                          |

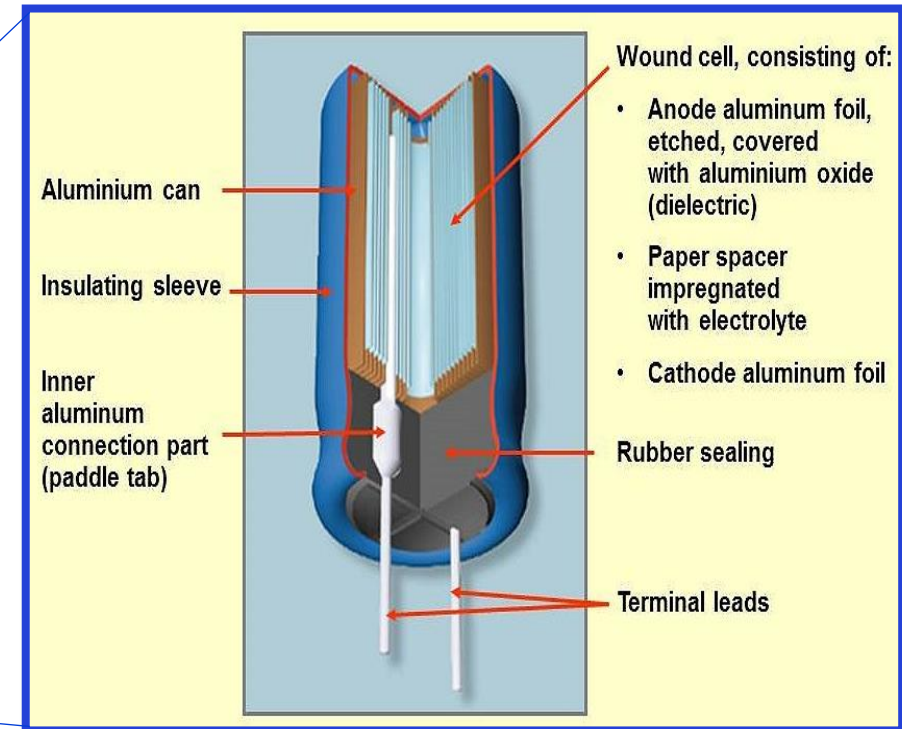
\*Excluding semiconductors, energy, medical, automotive, aerospace

## Details

|                                                   |
|---------------------------------------------------|
| Capacitors, dielectric films                      |
| Electret films in microphones, sensors            |
| Gaskets, sealing                                  |
| Microphone/speaker vent membrane                  |
| Piezo in acoustical equipment                     |
| Rubber parts in image forming process in printers |

# Complexity of electronics supply chain

- ▶▶ Even a simple circuit board contains dozens of different components
- ▶▶ A component consists of many articles
- ▶▶ A product contains thousands of articles
- ▶▶ Each article to be investigated for the use of PFAS



# Annex XV report about electronics

## Elements contradicting circularity for electronics and twin transition objectives

- 1** Apart from proposed 12-year derogation for the semiconductor manufacturing process, **no derogations for the electronics sector**
  - No computing / communications products will meet 18 months transition period
  - Huge economic impact, business closures
- 2** **No exemption for spare parts** of existing products
  - No spare parts can be made available despite the requirement to do so under the EU Ecodesign directive/regulation
  - As is, restriction will lead to premature obsolescence of products on the market
- 3** **No exemption for refurbished or pre-owned products** / articles already on the market

**Use and emissions from electronics are less than 1% of the total PFAS use and emission**

# Towards PFAS-free electronics

- ▶▶ **No drop-in alternatives** for most applications; products must be re-designed
- ▶▶ In many cases, there is no alternative for PFAS yet (e.g., Li ion batteries)
- ▶▶ **18 months transition period is insufficient**
  - Significantly more time is required to gather information on the uses of PFAS in all components of complex electronic products, substitution analysis and product re-design
  - Once alternative is available, product re-design normally takes *minimum* 24 months (selection, qualification, certification, etc.)
  - Redesign of a complete portfolio takes longer
- ▶▶ Applications which have no alternatives will require **timebound derogations** like EU RoHS exemptions

# Derogation needed | Spare parts & pre-owned products

- ▶▶ **At least 7 years derogation** needed to avoid premature obsolescence of existing consumer electronic products
  - Precedents in other REACH substance restrictions
  - Needed for compliance with Ecodesign, right-to-repair
- ▶▶ **At least 15 years derogation** needed to avoid premature obsolescence of existing professional b2b electronic products
  - Lifetimes and contracted maintenance periods usually extends to 10 to 15 years
  - Availability of spare parts is essential to realize the lifetime potential of such products
- ▶▶ **Without an exemption for re-supply of pre-owned products, resale of pre-owned products will be banned**
  - Established practice under REACH, POPs Regulation, CE marking legislation
  - Needed for compliance with future Ecodesign Regulation

# Spare parts & pre-owned products - Support from 25 global industry associations



# Conclusions & Way forward



- ▶▶ Current proposal will force most electronic products to be withdrawn from the market due to short transition period and no exemptions
- ▶▶ Elements are contradicting the Green Deal, Circular Electronics, and particularly Ecodesign objectives
  - Digital/Green Transition objectives impossible
  - No refurbishment, no repair; premature obsolescence



## **Transition towards PFAS-free electronics will take time**

- General 5-year derogation for EEE needed
- Time-bound exemptions for uses with no alternatives
- Derogations for spare parts and articles already on the market

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# Thank you for your attention!

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