

ANNEX 2- Answer to question 7 from Europump

Potential derogations marked for reconsideration – Analysis of alternatives and socio-economic analysis: Paragraphs 5 and 6 of the proposed restriction entry text (see table starting on page 4 of the summary of the Annex XV restriction report) include several potential derogations for reconsideration after the consultation (in [square brackets]). These are uses of PFAS where the evidence underlying the assessment of the substitution potential was weak. The substitution potential is determined on the basis of i) whether technically and economically feasible alternatives have already been identified or alternative-based products are available on the market at the assumed entry into force of the proposed restriction, ii) whether known alternatives can be implemented before the transition period ends (taking into account time requirements for substitution and certification or regulatory approval), and iii) whether known alternatives are available in sufficient quantities on the market at the assumed entry into force to allow affected companies to substitute.

A summary of the available evidence as well as the key aspects based on which a derogation is potentially warranted are presented in Table 8 in the Annex XV restriction report, with further details being provided in the respective sections in Annex E.

To strengthen the justifications for a derogation for these uses, additional specific information is requested on alternatives and socio-economic impacts covering the elements described in points a) to g) in question 6 above.

Application (no finished list)	Use	Property	PFAS
Pumps in Oil and Gas Industry	Gaskets, seals, wear parts in hydrocarbon upstream, midstream and downstream. Fastener coatings in offshore applications	Resistance against hydrocarbons Temperature resistance Low coefficient of friction Corrosion resistance and anti-galling properties	FKM, FFKM PTFE, ETFE
Pumps in food industry	Coatings, seals,	Non-sticking properties Resistance against aggressive cleaning chemicals	PTFE, PFA, FKM

Pump in other industries - Mining industry - Drinking water	Seals, gaskets, diaphragms, cables, coatings, wear parts, bearings, ...	Resistance against chemicals, temperature, weather, or a combination thereof. → Safety. Use due to tribologic functionality. → energy efficiency, duration, safety Use due to hygienic aspects. → health	PTFE FKM FFKM FPE (PFPE) ETFE ECTFE PVDF PFA PCTFE
Electronic industry - production of semi-conductors	To be specified by electronics manufacturers.		