

Meeting with stakeholders on PFAS restriction dossier

Short report to be shared with PFAS restriction group and the relevant stakeholder

Date: 23/03/21

Place: Online (1 hour)

Reporting Member State:

- NL

Participants (names and organization):

- Member State: NL
 - 5.1.2e (RIVM)
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- Stakeholder: 3M
 - 5.1.2e 3M Benelux
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Role of stakeholder/company:

- Producer and user of certain PFAS substances

Specific PFAS substance (if applicable):

- Diverse PFAS (polymers, liquids, etc.) as well as articles containing PFAS

Specific subject (if applicable):

- 3M's recent environmental stewardship commitment: <https://news.3m.com/English/3m-stories/3m-details/2021/3M-commits-to-achieving-carbon-neutrality-reducing-water-use-and-improving-water-quality/>.
- Those commitments do apply also to PFAS manufacturing sites in Europe: Dyneon site in Gendorf/Germany and Zwijndrecht plant in Belgium.

Stakeholder invited to provide the information presented in call for evidence or public consultation?

- 3M submitted information to the Call for Evidence in July 2020, as well as to several of the follow-up studies on PFAS uses in different sectors.
- 3M gave a presentation about their activities in Europe and their commitments.

Report

3M is both a producer of direct PFAS chemicals, as well as PFAS-enabled products. The PFAS-enabled portfolio covers > 1.000 products.

In Europe there are two fluorine material producing factories: in Belgium (Zwijndrecht) and in Germany (Gendorf/Burgkirchen). The Gendorf facility was originally a Hoechst facility but in 1996 a joint venture between 3M and Hoechst was started (named Dyneon). Currently it's a 100% 3M factory with a separate legal entity. In Zwijndrecht the facility is 50 years old.

3M is starting with some circular initiatives. In Burgkirchen, 3M recycles PTFE, FEP and PFE. The capacity is 500 tons / year and currently only production and processing waste is recycled. The yield is about 90%.

Immersive cooling of data center IT hardware is an important market for 3M. 3M ~~uses~~ is a producer of NOVEC Fluids, one of them being immersion cooling liquid and indicate that computer hardware is fully submerged in the liquid. The liquid can be filtered in situ but at a certain moment it likely needs to be replaced. NOVEC Fluids can be recycled and reused. Immersion cooling is a growing market. NOVEC Fluids that 3M produces are replacements for strong Greenhouse gases such as SF6 and other F-Gases. According to 3M their NOVEC Fluids are biodegradable and not PBT, CMR etc.



3M Meeting with
RIVM_final.pdf

Questions:

- 3M asks about the potential narrowing down of the restriction scope. RIVM explained that at least up till the Registry of Intention the scope will be as broad as during the CfE. 3M explains that there likely might be a thousand of derogation requests.
- 3M asks about essential use. RIVM explained that COM explanation / definition might be too late for the PFAS restriction file. An exemption per use is too simple as i.e. in medical uses there are examples of uses which might be substituted quite easily.
- 3M is working on an Application of Benefit Framework instead of Essential Use. It's being finalized now and a meeting with RIVM could be prepared for the 2nd half of April.

3M is also (going to) talk with other Member States.