

Jul 31, 2023

Comment on Proposed Restriction of PFAS

Japan Valve Manufacturers' Association (JVMA)

Japan Valve Manufacturers Association (JVMA) appreciates the opportunity to provide comments to the PFAS restriction proposal.

1. Introduction

JVMA was established in 1954 and has been a representative association of Japanese valve industry for nearly seventy years. As of today, we are comprised of 115 major domestic valve manufacturers including several Japanese subsidiaries of European valve makers and additional 68 associate companies. Since our establishment, we have implemented various effective programs to contribute to society, occasionally cooperating with some of Central Government Ministries and Agencies. Especially we are pouring the biggest effort to resolve environmental problems, so the Environmental Committee and four working groups in our organization are working on the following issues:

- Greenhouse gas reduction.
- Design for the environment of valves.
- Life cycle assessment of valves.
- Gathering information on restricted substances.
- Environmental education.

To response to the PFAS restriction proposal, we have prepared a technical and socioeconomic statement which is attached document.

2. Comment

The valve sealing parts are made of PTFE, PVDF, CTFE, PFA, ETFE, FKM, FFKM with persistent technical functions depending on the application.

Their fluoropolymers, fluor elastomers and fluorine grease contribute to valve sealing and durability.

Valves are widely used in waterworks, sewage treatment facilities, chemical plants, power generation facilities, buildings, food manufacturing, pharmaceutical manufacturing, aerospace industry, petroleum related facilities, agriculture, fisheries, ships, gas supply facilities, hydraulic and pneumatic systems, fire prevention equipment, liquor production,

liquid filling, semiconductor manufacturing equipment, organic EL manufacturing, liquid crystal flat panel manufacturing, battery manufacturing, fuel cell manufacturing, hydrogen-related facilities, chemical analysis equipment, environmental analysis equipment, nuclear facilities, etc.

The categories, industries and facilities used valves are essential uses.

Spare parts placed on the market 18 months after the restriction enters into force are proposed to fall under the restriction and are not proposed to have a derogation.

Valves and facilities are designed to be long lasting with maintenance.

If valves for maintenance fall under the restrictions, socio-economic benefits will suffer.

There are potential risks arising from some alternatives.

Those risks are expected to be greater than the risks of PFAS persistence.

In Article 60 of the REACH Regulation,

the European Commission should also consider “whether the transfer to alternatives would result in reduced overall risks to human health and the environment” when deciding on an application for authorization.

We demand that maintenance valves be listed under the "derogation without a time limit" for the health and safety of EEA people.