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To the European Commission
Rue de la Loi / Wetstraat 200, 1049 Brussels, Belgium
Maroš Šefčovič, Executive Vice-President – European Green Deal
Janusz Wojciechowski, Commissioner for Agriculture
Thierry Breton, Commissioner for the Internal Market
Virginijus Sinkevičius, Commissioner for the Environment

AGCO response to ECHA consultation on PFAS restriction (21/09/2023)

SECTION III. Non-confidential comments “0: General Comments”

AGCO is a global leader in the design, manufacture and distribution of agricultural equipment. In Europe we are one of the leading manufacturers of agricultural machinery with our core brands Fendt, Massey Ferguson, Valtra, Precision Planting and Grain & Protein.

AGCO has already taken the opportunity to submit scientific and technical information on the manufacture, placing on the market and use of per- and polyfluoroalkyl substances (PFAS) directly to ECHA portal and participated to CEMA led survey “CEMA questionnaire on PFAS” to assess the socio-economical impacts of the proposal.

AGCO supports the derogation proposals put forward by CEMA:

- the application of the restriction proposal should be applied at least after 48 months (instead 18 months) as lead time to the European industry to be ready for the transition in relation to the restriction and its effect on our supply chain. Our machines are designed to have decades of useful life so it will require much longer time for validation testing and to meet many safety standards required in our industry;
- general derogation for unlimited time must be granted for fluoropolymers plastic and elastomeric used;
- expand the derogations for “Automotive sector” to include the “Agricultural and Forestry sector” due to the high amount of shared supply chain and the off-road sectors adopting many of the automotive design changes;
- specific exemptions to aftermarket parts and components to protect against the premature obsolescence of machineries, so they could be repaired as produced and to be in line with the European Green Deal maintaining the long-life expectancy of our products on the market;
- extension of the derogation period for some “uses” and foreseen after, a re-evaluation of the impacts on the industry.

We would like to reemphasize the CEMA assessment that the ban could cause a temporary or complete production stop of machines and spare parts; in AGCO this would directly impact 15 000 employees alone in Europe. For our farmers it would be impossible to purchase a new machine or have one repaired. The agricultural sector would be at risk not to be able to deliver on the market food demands and farmers would be facing serious loss of income. As a result, it would trigger a food shortage which would inevitably lead to a rise in food prices, economic and world instability.

Please take the severe consequences a general PFAS ban would have for the entire European industry and food security into serious consideration before taking such a decision.

Best regards,

