

JP4EE Annex 6 Explanation on EEE Functions in Annex 4

Application examples and PFAS essentiality in Electrical and Electronic Equipment.

As of 22 September 2023

Contents

1. Optical function and required properties	3
2. High-speed communication/transmission function and required properties	7
3. Piezoelectric function and required properties	11
4. Sliding function in mechanical section and required properties	14
5. Display function (Liquid crystal) and required properties	23
6. Safety and safety functions and Required properties	29
7. Functional surface and required Properties	35
8. Semiconductor and required Properties	44
9. Thin film device production process and required Properties	45
10. Energy supply (Battery) and required Properties	46
11. Refrigerant function (Refrigerant gas) and required Properties	47

1. Optical function and required properties

(1) Optical function

Essential for EEE (Electrical and Electronic Equipment) to control transmission, reflection, diffusion etc. of light.

For example, camera imaging and optical communication of fiber optic cables.

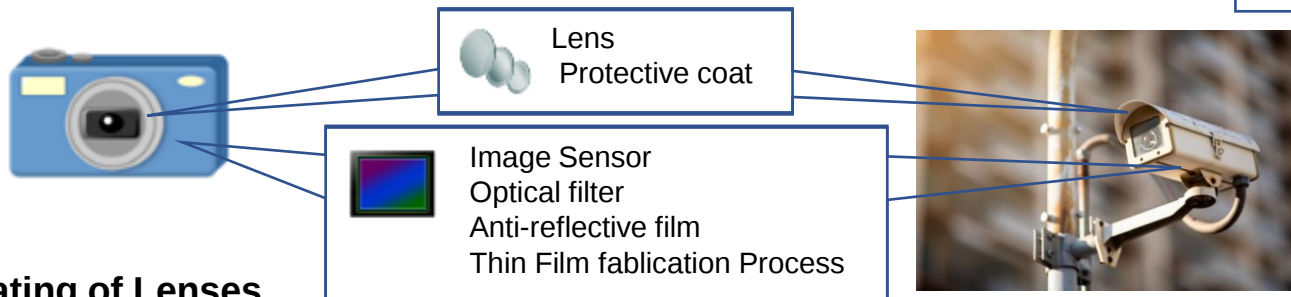
(2) Required properties for parts and components

- Low refractive index, high light transmittance, high durability
e.g.) Lens (high sensitivity), image sensor (high sensitivity), LED antireflection coating (energy saving), optical fiber (high-speed transmission)
- Transparency/No absorption in visible light (approx. 380 to 770 nm) and water and oil repellency.
e.g.) Protective coating for lenses (high durability), encapsulant for LEDs (high reliability, energy saving)

* () indicates achievable performance

<Application examples>

[Digital camera, Surveillance camera, etc]



Protective Coating of Lenses

Light reflection occurs between objects with different refractive indices, and the greater the difference in refractive index, the greater the reflection. If light is reflected at the interface between air and lenses with different refractive indices, it will result in loss. Therefore, a layer with a low refractive index, which is intermediate between the refractive indices of air and lens, can prevent reflection and reduce loss. In addition, to protect the lens, stain resistance and durability through water and oil repellency are also essential.

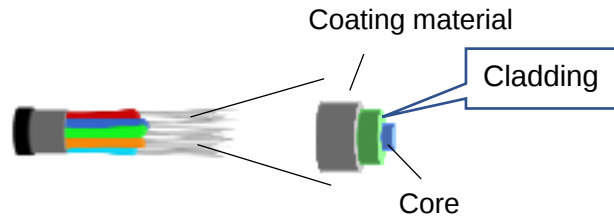
1. Optical function and required properties

<Application examples>

[Optical fiber]

Essential for high-speed communication and transmission functions

Parts in which
PFAS is used



Cladding Material of Optical Fiber

Optical fiber has a concentric structure in which a core with a high refractive index is covered with a layer with a low refractive index called cladding, and light is confined and transmitted within the core. Losses occur when light is reflected at the interface between the coating material and core, which have different refractive indices. A layer with a low refractive index prevents diffuse reflection. Durability (heat, moisture, and scratch resistance) is also essential for the application.

1. Optical function and required Properties

(3) Required properties for materials and comparison with non-PFAS materials

Required properties for materials	Materials					Note
	Fluoro-Polymers*	Quartz glass	PMMA	Acrylic	Silicone	
Refractive index (n_d)	1.33~1.42	1.45	1.49	1.48	1.42	- When materials with different refractive indices are mixed, light is refracted and scattered at the interface between the substances, resulting in loss of transparency and cloudiness, so a single composition is necessary. - For anti-reflection (high transmittance), a materials with a refractive index intermediate between that of air and that of lenses is desirable, especially for glass.
Water and oil repellent	○	×	×	×	△	
Flexibility	○	×	×	△	○	

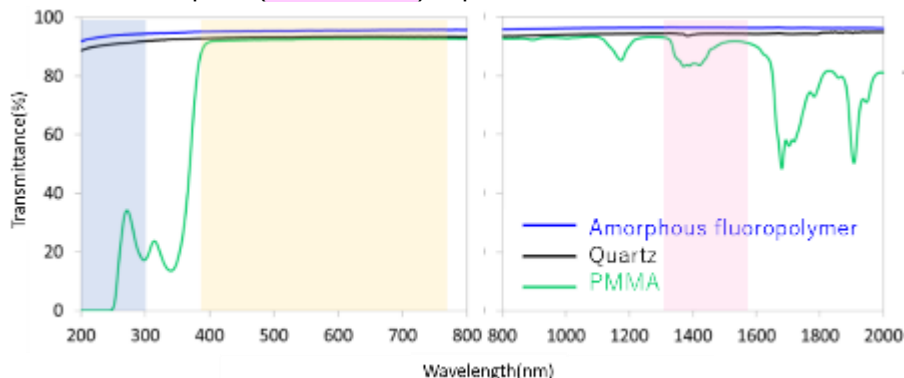
* PTFE,PFA,FEP,ETFE,PVDF

○=Excellent; △=Usable; ×=Not well suited for use

<Light transmittance versus wavelength>

High transmittance over a wide wavelength range

- No absorption (UV): UV LED encapsulant
- No absorption (visible light): Coating materials
- No absorption (near-infrared): Optical fiber for communication



- Materials must have a low refractive index (intermediate between the refractive index of air and that of lenses) for optical applications, which are achieved by controlling the transmission, reflection, and diffusion of light. In addition, water and oil repellency and flexibility are also essential to ensure the reliability and durability of devices.
- These must be realized with a single material (A higher refractive index means that light is not focused (scattered) and the intensity of light is reduced, resulting in reduced sensitivity of the device).

There is no material other than fluoropolymers that can achieve a good balance of low refractive index, water and oil repellency, and flexibility (there is no alternative material).

1. Optical function and required properties

(4) Social impact when PFAS cannot be used (example)

1) Fluorine material cannot be used in the camera, resulting in poor imaging performance

- The lack of clarity of the camera lens reduces the security performance of surveillance cameras, and the larger size of the camera lens is required to compensate for the lack of clarity, which is counter to energy conservation.
In addition, if water and oil repellent coatings cannot be applied to the camera lens, reliability will be reduced and product life will be shortened (frequency of replacements or exchanges will be required).

2) When fluorine material could not be used as cladding material for optical fiber

- Optical fiber is a waveguide for propagating light and supports high-speed communication and transmission functions as a transmission path for optical signals in the field of optical communications, an essential function of EEE. In the information society, demand for communication is increasing rapidly. The communication speed is reduced due to the deterioration of transmission loss (the speed is reduced in the Internet, where real-time communication is interfered with), and this will prevent the progress of digital communication in the future.
- If fluorine material cannot be used for the cladding material, the light confinement function in the core is reduced, so it is necessary to thicken the core or increase the number of single wires to increase light intensity. This also deteriorates the handling performance during installation and other operations. Furthermore, because the size of the light source will be changed, the entire optical system will need to be redesigned.
- In additional, the power consumption of the equipment will also increase, which is contrary to energy conservation.

2. High-speed communication/transmission function and required properties

(1) High-speed communication and transmission functions

Essential functionality to achieve high-speed, high-capacity communications by using high-frequency radio waves (low transmission loss) with telecommunications and infrastructure equipment.

(2) Required properties for parts and components

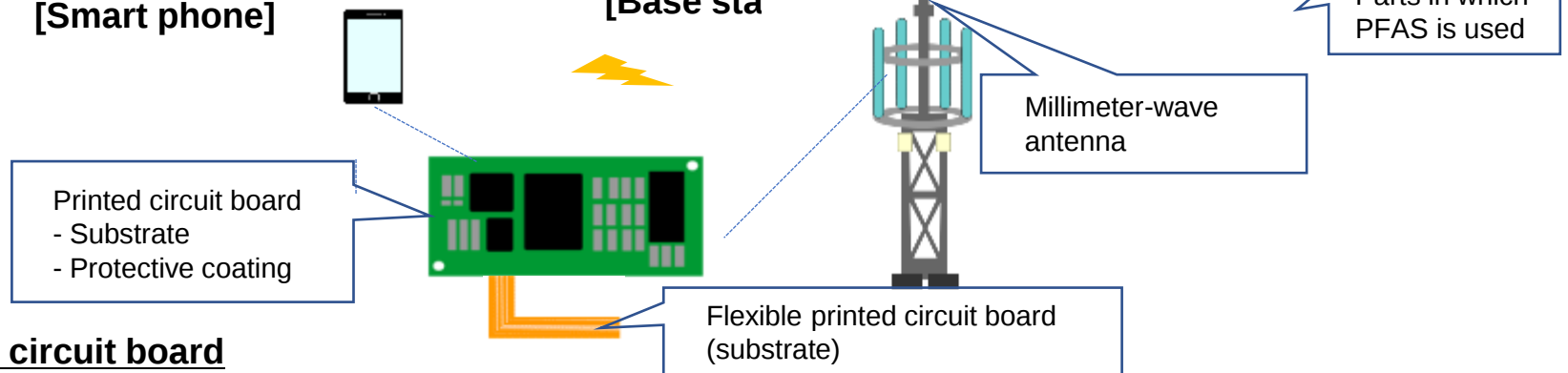
- Low dielectric constant and dissipation factor at high frequencies and small frequency dependence. Furthermore, high reliability (heat resistance, flame retardance, and long life) is also essential. Therefore, all the performance must be satisfied at the same time.
- e.g.) Printed circuit boards for high-speed transmission and millimeter wave radar such as 5G, coaxial cables, satellites and antennas in the millimeter wave band: (high-speed, high-capacity communication, high reliability and energy saving)

* () indicates achievable performance

<Application examples>

[Smart phone]

[Base sta]



Printed circuit board

When fluoropolymers with low dielectric constant and low dielectric loss tangent are used as the substrate, the signal energy is not attenuated. This is due to the low rate at which part of the energy is lost internally as heat when current flows. In addition, flame resistance is essential for heat resistance and safety for component mounting. The long life required for base stations can be achieved at the same time, ensuring high reliability.

2. High-speed communication/transmission function and required properties

<Application examples>

[Coaxial cables
(high-frequency wires)]

Insulator



Parts in which
PFAS is used

Coaxial cables (high-frequency wires)

The relative dielectric constant of the insulator must be close to that of air (relative dielectric constant: 1) to reduce transmission loss (attenuation of electrical signals due to heat). PTFE has a low relative dielectric constant of 2.1 and is both flame retardant and highly durable to ensure equipment reliability.

2. High-speed communication/transmission function and required properties

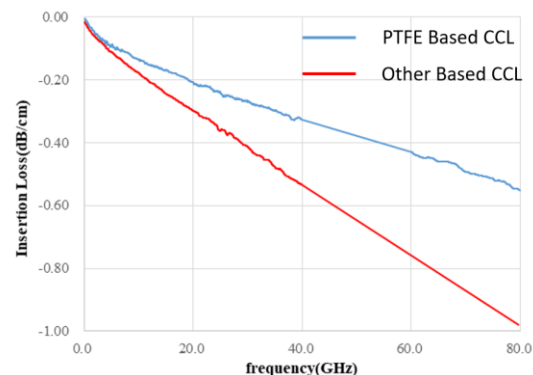
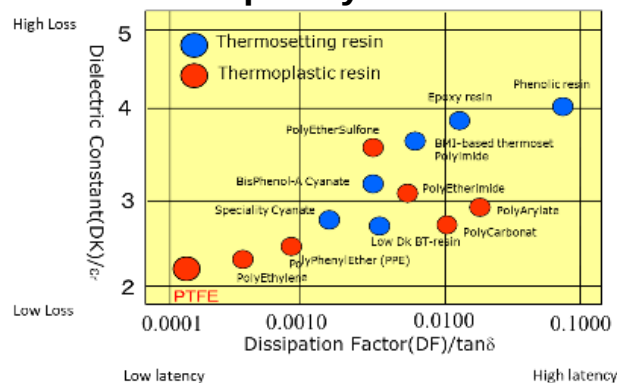
(3) Required properties for materials and comparison with non-PFAS materials

Required properties for materials	Fluoro-polymers*	FR-4 epoxy	Modified polyphenylene oxide (PPO)	Polyimides (PI)	Polyethylene (PE)	Liquid crystal polymer (LCP)	Note
Dielectric constant (ϵ)	2.1	4~5	3.5	3.2	2.3	2.9	When mixing different materials, inferior properties appear.
Dielectric tangent ($\tan\delta$)	0.0006	0.015	0.002	0.002	0.001	0.0035	
Thermal resistance Non-combustibility	◎	△	○	○	×	◎	

*PTFE,PFA,FEP

◎=Superior; ○=Excellent; △=Usable; ×=Not well suited for use

<Requirements and frequency characteristics of the equipment>



* Source
Nippon Pillar Packing
co.,Ltd.
<https://www.pillar.co.jp/en/>

Characteristics of dielectric constant and dielectric tangent in resin materials

Frequency dependence of transmission loss

- The use of high frequencies such as millimeter waves is essential for electrical and electronic equipment for high-speed and high-capacity communications, and transmission losses need to be as low as possible. The material must have a low dielectric constant, low dielectric loss tangent and low frequency dependence to reduce transmission losses at high frequencies (signal energy loss by heat). Furthermore, the high-frequency equipment needs to be highly heat-resistant and reliable, as it is used for millimeter-wave sensors in base stations and ADAS (Advanced Driver-Assistance Systems). These need to be realised in a single substance.

There are no materials other than fluoropolymers that combine low dielectric constant and low loss at high frequencies with high heat resistance and high reliability (no alternative materials).

2. High-speed communication/transmission function and required properties

(4) Social impact when PFAS cannot be used (example)

1) When fluoropolymers cannot be used for high-frequency substrates for smartphones and base stations

- High-speed and large-capacity communication is increasingly required in the information society, but if fluoropolymers cannot be used, transmission losses at high frequencies will increase and large-capacity communication (e.g., video communication) will be delayed. Furthermore, the board generates heat due to high transmission losses, leading to heat generation in the equipment. Therefore, the equipment needs to be designed for cooling (contrary to energy saving).
- Heat generated by the equipment also affects the product life of other components (e.g., capacitors) mounted on the board, thus shortening the life of the equipment (requiring more frequent replacement or exchange).

2) When fluoropolymers cannot be used for millimeter-wave radar substrates

- Millimeter waves are used in sensing technology to enhance safety in driving, for example in ADAS (Advanced Driver-Assistance Systems). If fluoropolymers cannot be used in substrates and antennas for high-speed millimeter-wave communications, instantaneous sensing isn't possible due to the delay in radio waves, which significantly affects human safety. In addition, as vehicles are used in particularly harsh environments, high reliability characteristics (such as heat resistance, moisture resistance and long life) must be met at the same time.
- If millimeter-wave radars have short life, they will require maintenance and replacement within a short period of time, increasing waste and maintenance costs.

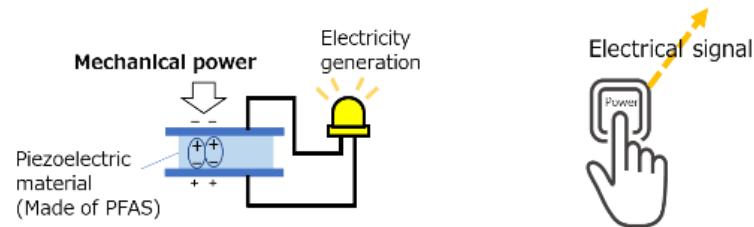
3. Piezoelectric function and required properties

(1) Piezoelectric function

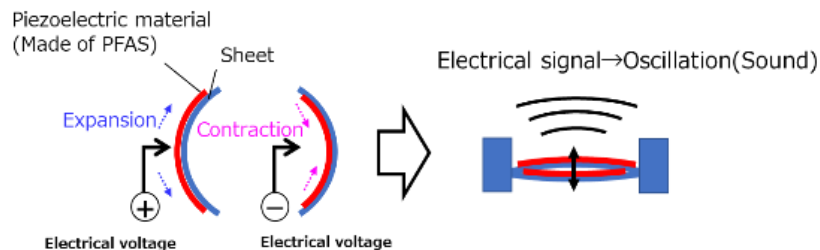
Essential for EEE to the performance of crystalline materials in converting mechanical strain into voltage and voltage into mechanical strain.

3. Piezoelectric function

1) Piezoelectric effect: Convert mechanical power into electrical voltage



2) Inverse piezoelectric effect: Convert electrical voltage into mechanical power (Expansion and Contraction)



3. Piezoelectric function and required properties

(2) Required properties for parts and components

- The material must have a high piezoelectric coefficient (the higher the coefficient, the better the response) that converts mechanical strain into voltage and voltage into mechanical strain, and must also satisfy processability and durability (high temperature and high humidity) at the same time.

e.g.) Touch panel, Sensor, Speaker, Headphones, Inkjet printer head : (Freeform, Cost reduction, high reliability)

* () indicates achievable performance

<Application examples>

[Pressure sensor for healthcare]

e.g. : Wrist-mounted pulse wave sensor

Pressure sensor
(Core device of the product)



Parts in which
PFAS is used

Pressure sensors for healthcare

Flexibility is essential in addition to piezoelectricity for pressure sensors that require installation on curved surfaces. (e.g. : Wrist-mounted pulse wave sensor)

This flexibility cannot be achieved with inorganic piezoelectric materials, and even with organic piezoelectric materials, only fluoropolymers can achieve high voltage coefficients and high reliability (heat and moisture resistance) in the operating environment as sensors.

Since the organic piezoelectric material is in film form, high productivity and large area can be achieved, and low-cost sensors can be provided.

(3) Required properties for materials and comparison with non-PFAS materials

	Organic type		Inorganic type		
Required properties for materials	Copolymers VDF with trifluoroethylene	Polylactic acid	Piezoelectric crystals	PZT (Ceramic piezoelectric materials)	PZT (Piezoelectric films)
Piezoelectric constant d_{33} (pC/N)	~40	7~12	2.0	100~600	100~600
Durability	○	△	◎	◎	○
Fabrication of thin films	◎	◎	×	×	◎
Pliability	◎	◎	×	×	×
Cost reduction	◎	◎	△	○	×

◎=Superior; ○=Excellent; △=Usable; ×=Not well suited for use

- They are inferior to inorganic materials in terms of piezoelectric constants and reliability. However, ceramic materials are generally brittle and difficult to process, making it difficult to form and process them as large-area, thin-film materials. Flexibility and large area, which can only be achieved with organic piezoelectric materials, and lower cost due to significant changes in the production process are important factors that cannot be realized with inorganic piezoelectric materials. Important Technologies Supporting Wearable Electronics

(4) Social impact when PFAS cannot be used (example)

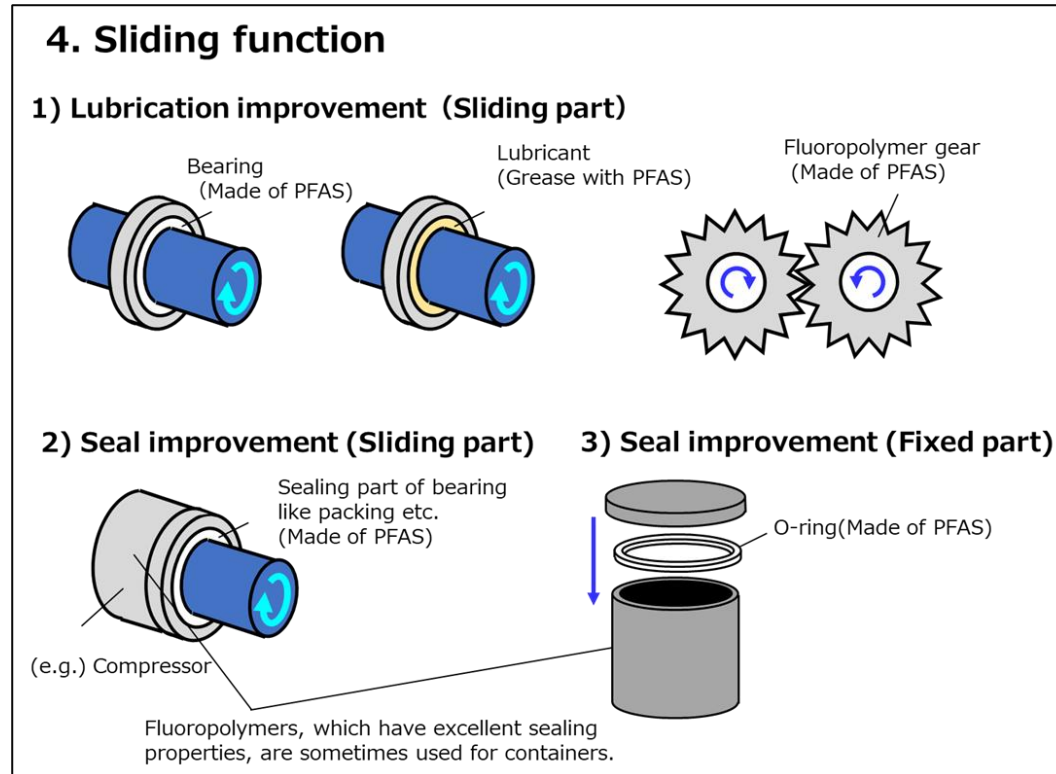
■ When fluoro resin could not be used for piezoelectric element as pressure sensor for biomedical

- In the healthcare field, there is a need for sensor devices that can more easily and accurately monitor daily vital information (heart rate, respiration, etc.) in a "non-constrained" manner without any hassle or feeling of being worn. Since these sensors are attached to the arm or body for measurement, they need to be curved in shape, lightweight, and sensitive so as not to interfere with daily life. The only organic piezoelectric material that satisfies these requirements is fluoro resin-based in terms of sensitivity.
- In order to live a long and healthy life, the need for sensors for health care, which are also used to manage physical condition, is increasing rapidly. For medical support, it will continue to be necessary to develop sensors that are inexpensive and can be used by anyone, and if PFAS cannot be used in this regard, the potential of future technologies will be destroyed.

4. Sliding function in mechanical section and required properties

(1) Sliding function

Essential function for EEE to control and ensure the smooth movement of driving parts or sealed parts, such as camera zoom lenses, motors, compressors, etc.



(2) Required Properties for Parts and components

- Two or more high-reliability properties such as lubricity and flame retardance must be achieved simultaneously in one material.
e.g.) Motors, bearings, gears, camera lenses, grease, lubricants (high durability, high reliability)
- Two or more high-reliability properties such as flame retardance, chemical resistance, and water repellency, must be achieved simultaneously in one material.
e.g.) Packing, O-ring (high durability, high reliability)

* () indicates achievable performance

4. Sliding function in mechanical section and required properties

<Application examples>

[Camera]

Sliding functions in camera's mechanism section

Numerous sliding parts are required to work stably at high speed, with high precision, over a long period, and in harsh environments.

Cameras must satisfy functionality and performance requirements even in harsh environments such as extremely cold, deserts, and tropical regions. If substances derived from lubricant adhere to the lens or sensor, the image will be significantly affected. In addition, the recent trend toward reducing environmental impact requires longer product life. Considering these factors, the lubricants that can be used are limited to fluorine-based lubricants.

<Typical functions of a camera and the role of fluorinated lubricants>

① Autofocus lens drive unit

Image formed on the sensor surface by changing the distance between the lens and the image sensor surface

➡ Instantly drive on the order of microns to achieve high-speed/high-precision focus adjustment

② Shutter mechanism

Controls exposure time of image sensors down to a few thousandths of a second

➡ Contribute to higher speeds and lower dust emissions for shutter blades and driving components

③ Zoom mechanism

Use a rubber ring on the plastic tube to prevent dust from entering the zoom inside.

➡ Ensure smooth operation and improves water repellency.

④ Buttons, dials, etc.

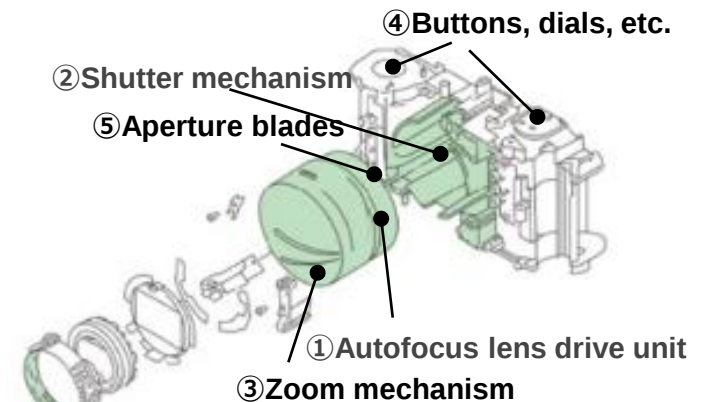
High precision/stable operation, high wear resistance, long product life

➡ No effects on electrical components and contribute to stable operation and long product life.

⑤ Aperture blades

The multiple blades that make up the aperture mechanism must be positioned with high precision.

➡ Provides lubricity and high durability to the blade to ensure reliable operation.



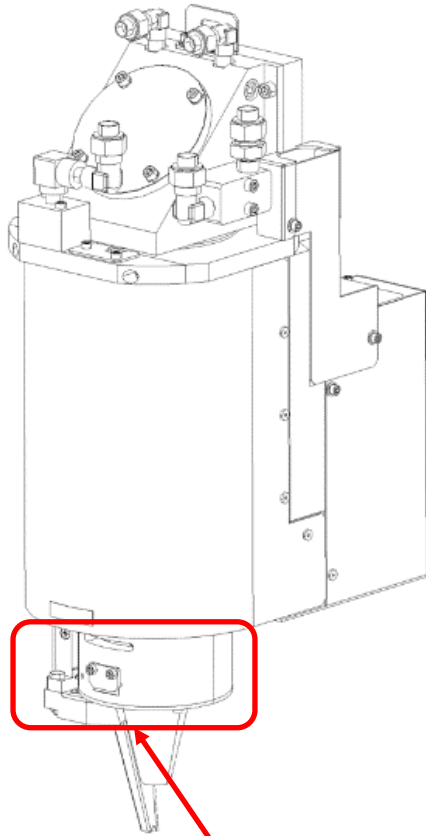
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Parts using fluorinated lubricants

Cameras require high-speed, high-precision drive/operation and long-life characteristics in harsh environments ⇒ Use of lubricants is essential

<Application examples>

[Laser processing machine : 1) Lens focus adjustment component]



Lens focus adjustment component

- Machined parts (PTFE, etc.)
- O-ring (FEP, FKM, etc.)

Focusing mechanism on processing head

The processing head has a structure that rotates and slides inside the lens focus adjustment component in order to adjust the focus.

- The focus should be changed arbitrarily according to the materials to be processed.
- High sliding capability is required.

<Functions realized by using PFAS>

- ◆ Prevention of damage due to rubbing between parts
- ◆ Prevention of adhesion between parts by reducing friction
- ◆ Extending the life of parts by improving abrasion resistance
- ◆ Prevention of combustion in the case of heat input such as radiated beam
- ◆ Airtightness to prevent dust from attaching on the lens (lens burn prevention)

<Required properties for parts and components>

Lubricity, abrasion resistance, flame retardant, airtightness

For use in more demanding industrial conditions, these PFAS is the only material that satisfies the required properties at the same time.

Fig. External view of machining head

4. Sliding function in mechanical section and required properties

<Application examples>

[Laser processing machine : 2) Shaft driving part]

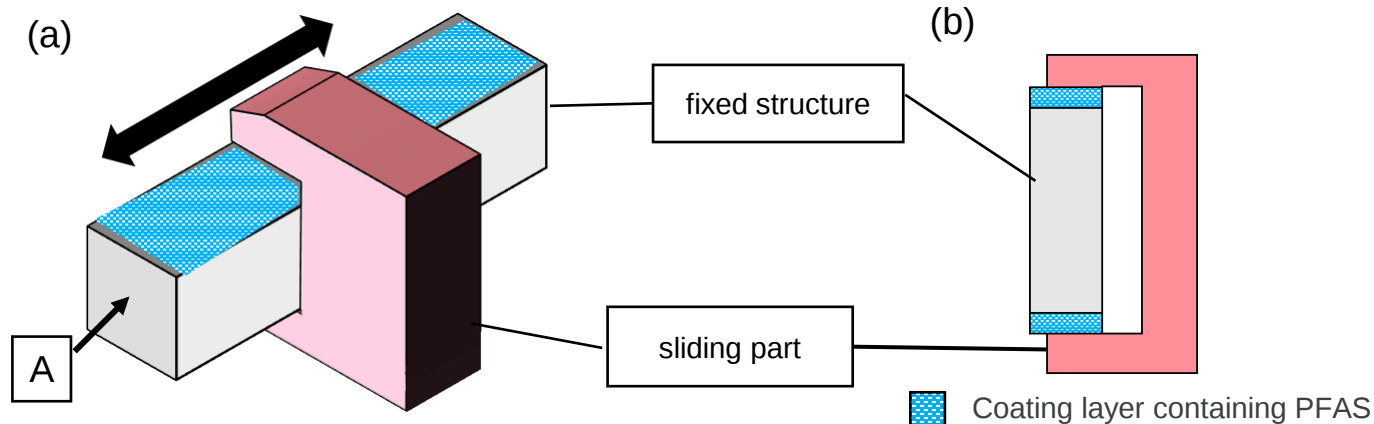


Fig. Simplified diagram of shaft driving part (a)bird-eye view, (b)view from the direction of arrow A (see Fig. (a))

Mechanism of shaft drive part

Laser processing machine must be operated in an environment with a lot of dust including minute fragments of processing materials.

From the viewpoint of dust prevention, the sliding part and the fixed structure are operated in close contact.

<Functions realized by using PFAS>

- ◆ Prevention of damage due to rubbing between parts
- ◆ Prevention of noise due to rubbing between parts
- ◆ Prevention of adhesion between parts by reducing friction
- ◆ Extending the life of parts by improving abrasion resistance
- ◆ Prevention of combustion in the case of heat input such as radiated beam

<Required properties for parts and components>

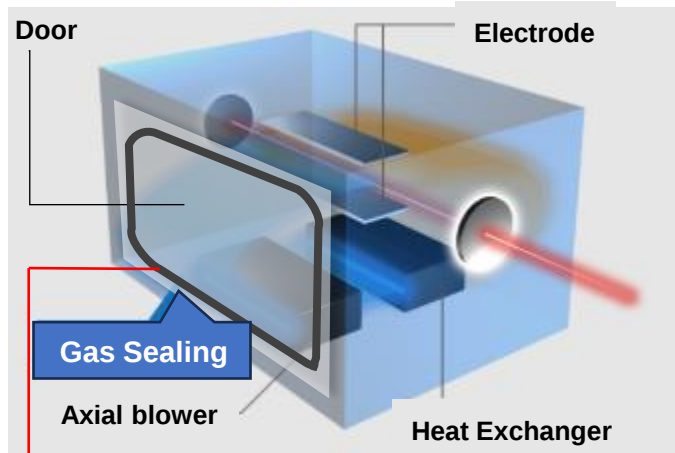
Coating for lubricity, abrasion resistance, flame retardancy, and antifouling

For use in more demanding industrial conditions, these PFAS is the only material that satisfies the required properties at the same time.

4. Sliding function (and 6. Safety and safety functions) in mechanical section and required properties

<Application examples>

[Laser processing machine : 3) Laser oscillator]



O-ring (Fluoroelastomer)

Fig. Simplified diagram of vacuum container

Mechanism of Vacuum container of the laser oscillator

Vacuum container of the laser oscillator must be sealed from outside air and held under the high vacuum or in the laser medium gas environment.

The vacuum container is equipped with an openable door sealed by an O-ring to enable maintenance of internal components.

The O-ring used in the vacuum container must be made of a material that can withstand high temperatures, ultraviolet irradiation, and ozone gas generation caused by discharge during laser oscillation.

Fluoroelastomer is the only material available that satisfies these properties.

* In addition to the door, O-rings are used for sealing such as the holding part of optical components.

<Functions realized by using PFAS>

Under the high vacuum, high temperature, ultraviolet radiation, and ozone gas environments,

- ◆ hermetic sealing with low outgas
- ◆ long-term retention of airtightness

<Required properties for parts and components>

Heat resistant, airtightness, corrosion resistant

To ensure occupational safety when using lasers, hermetic seals (PFAS) are essential from the aspect of “6. Safety and safety functions”.

For use in more demanding industrial conditions, these PFAS is the only material that satisfies the required properties at the same time.

4. Sliding function in mechanical section and required properties

(3) Required properties for materials and comparison with non-PFAS materials

1) Articles: Bearings, Gears, Rolls, Sealing materials (Packing, O-rings, etc.)

* Please see also "6. Safety and safety functions"

■ Resins

Properties	Fluoropolymer	Other Resins						
	PTFE	PE	PVC	POM	PC	PS	PP	ABS
Organic solvent resistance	◎	○	△	○	△	×	○	×
Acid resistance	◎	○	○	×	△	×	△	△
Alkali resistance	◎	◎	◎	○	×	○	○	○
Flammability	not catch fire	Extremely slow	Natural fire extinguishing	slow	Natural fire extinguishing	slow	slow	slow
Dynamic friction coefficient (ud)	0.09	0.13	0.25	0.18	0.45	0.47	0.37	0.48
Surface energy (dyn/cm)	18	31	39	36	42	36	29	42
Water absorption (ratio %)	<0.01	<0.01	0.04~0.75	0.22~0.25	0.15~0.18	0.03~0.1	<0.01	0.2~0.6

◎=Superior; ○=Excellent; △=Usable; ×=Not well suited for use

- There is no material other than fluoropolymers that can simultaneously satisfy multiple properties such as flame resistance and chemical resistance in addition to lubricity.



- Fluoropolymers are more expensive than commonly used materials, and therefore they are not used blindly. They are only used selectively in applications where they cannot be substituted under severe conditions, even in required properties for safety and safety functions that are essential for EEE. (There is no alternative material because of selective use.)

4. Sliding function in mechanical section and required properties

■ Rubbers

Properties	Fluoroelastomers		Synthetic rubbers			
	FKM	FEPM	Silicone	EPDM	CR	NBR
Heat resistance max use temperature, °C	230	230	230	150	100	120
Chemical resistance	○	○	△	△	○	○
Ozone resistance	◎	◎	○	○	×	×
Cold resistance	△	△	△~○	△~○	△~○	△
Electrical insulation (Dielectric constant, ϵ)	△ (3~4)	△~○ (2.5~3.5)	△ (3.2~10)	△~○ (2.5~3.5)	×	×
Combustibility	◎	◎	△ Chemical resistance is reduced by flame retardant	△ Chemical resistance is reduced by flame retardant	○	△
Gas permeability (cc·cm/cm ² ·sec·atm)	1	1	400	15	15	3

◎=Superior; ○=Excellent; △=Usable; ×=Not well suited for use

- **Fluoroelastomers have overwhelmingly excellent chemical resistance, ozone resistance, and insulation properties in addition to heat resistance and flame resistance, compared to other rubber. They also have excellent gas barrier properties (the smaller value, the less gas permeates.), so they are used in sealing materials (packing) that also require heat and chemical resistance and cannot be substituted.**



- Fluoroelastomers are also more expensive than commonly used materials, and therefore they are not used blindly. They are only used selectively in applications where they cannot be substituted under severe conditions, even in required properties for safety and safety functions that are essential for EEE. (There is no alternative material because of selective use.)

4. Sliding function in mechanical section and required properties

2) Preparations: Greases, Lubricants, Protective coating materials

a. Lubricating components

Properties	Fluoropolymer	Molybdenum disulfide	Graphite
Light load lubricity	○	×	×
non-conductive	○	○	×
Polite resistance	○	×	×

○=Excellent; ×=Not well suited for use

b. Solvents

Properties	Fluorosolvent	Petroleum oil	Silicone oil
Chemical Attacks on Plastics	Low	high	low
Generation of volatile gases	low	low	high
Risk of contact failure	not	not	Yes
Temperature viscosity change	low	high	low
flammability	not	Yes	not

Major compositions : a. Lubricating components + b. Solvents

➡ Fluoropolymers + Fluorosolvents is best

- Only "fluoropolymers and fluorinated solvents" have lubricity, thermal stability, and no negative effects on components (i.e., there are no alternatives).

4. Sliding function in mechanical section and required properties

(4) Social impact when PFAS cannot be used (example)

1) If fluorine material cannot be used in the cameras, the functional degradation will occur.

- Furthermore, EU customers will not be provided with high-performance cameras year after year. Cameras that are significantly less capable than the current ones will likely miss or fail to record key moments in news, sports, events, etc., and will have a significant impact on their coverages with photos and videos in EU.
- If the camera lens cannot be coated with a sliding function coating, it will lead to a decrease in reliability and shorten the product life. (Frequency of replacements or exchanges will be required).
- The performance of mechanical sections such as focusing and zooming is reduced, making it difficult to capture fast-moving subjects.

2) If fluoropolymers cannot be used for safety and high reliability components such as O-rings and packings.

- The safety of electrical and electronic equipment cannot be guaranteed, which in turn places people and the environment in an unsafe situation. Such components are widely used in sections that must simultaneously meet high reliability (safety) requirements such as heat resistance, insulation, flame resistance, and solvent resistance, especially in equipment for professional use. Examples include industrial equipment such as EEE and other production equipment (heating furnaces, molding machines, robots, semiconductor manufacturing equipment, etc.), infrastructure equipment, medical equipment, and analytical instruments.
- If fluoropolymers with excellent water repellency and lubricity cannot be used, the waterproof performance of EEE cannot be guaranteed and product life will be shortened.
- Since fluoropolymers with excellent solvent and chemical resistance cannot be used, it is difficult to meet the required performance, especially in medical devices, analytical instruments, and semiconductor manufacturing equipment, which are likely to come in contact with chemicals and solvents, due to lack of reliability and frequent maintenance replacement, which also affects the life of the equipment.
- Lack of equipment reliability not only leads to increase of waste, but also significantly affects work safety in professional use.

5. Display function (Liquid crystal) and required properties

(1) Display function (Liquid crystal)

Function to display information such as text, graphics, and video by controlling pixel luminance and reflectance by giving each pixel on the screen an On, mid-tone, or Off signal.

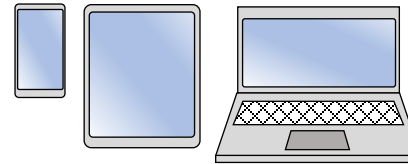
(2) Comparison with other devices as a display

Table 1: Comparative characteristics of LCD, CRT, and OLED

Character	LCD	CRT	OLED
Weight	Light	Heavy	Light
Volume (thickness)	Thin	Large (Thick)	Thin
Large Screen	Available	Unavailable	Available
Power consumption	Low	High (2x of LCD)	1.3x of LCD
High resolution	High	Unfeasible	High
Response speed	Mid	High	High
Contrast ratio	Mid	High	High
Brightness	Mid	High	Lower than LCD
Durability	High	Low Degradation of phosphers	Low Degradation of phosphers
Price	Low	Unavailable	High
Repairability	Easy	Hard	Hard

Table 1 shows that the characteristics of LCDs are better balanced than CRTs and OLEDs

<Application examples>



- ✓ Smartphone
- ✓ Tablet
- ✓ PC



TV



Digital Signage



5. Display function (Liquid crystal) and required properties

(3) Required properties for materials and comparison with non-PFAS materials

- The introduction of fluorine into liquid crystalline compounds has the effects shown in the table below.
- The decrease in $\Delta\epsilon$ has the tendency to increase the drive voltage, but the decrease in viscosity η with the introduction of fluorine results in a rather low threshold voltage due to the decrease in elastic constants. As a result, low voltage drive becomes possible with the introduction of fluorine. This low-voltage drive leads to lower power consumption and contributes to global environmental sustainability.
- There is no other liquid crystal material with these characteristics other than fluorine-based liquid crystals, which cannot be replaced by cyanide-based liquid crystals.
- In particular, the large temperature dependence of the threshold voltage of cyanide-based liquid crystals and their slow response are fatal defects in moving image displays.

General properties and characteristics of materials and properties required for liquid crystal displays.

Properties	Cyano-based LC compounds	Fluorine-based LC compounds	Effect
Viscosity η	High: 20cp	Low: 10cp	Low viscosity generates high speed response
Refractive index anisotropy	Large	Large	Same Optical properties
Specific resistance	Low: 1.0 E+13 Ω cm	High 1.0 E+15 Ω cm	Reliability, Preventing image sticking
Dielectric anisotropy $\Delta\epsilon$	High: 20	Low:10	Low driving voltage
Birefringence index Δn	High: 0.2	Low: 0.1	Wider viewing angle
Wavelength dependence of birefringence	High: 0.02	Low: 0.01	Wide operating temperature range
High voltage holding ratio at high temperature	Low: 90%	High: 99%	Reliability, Wide operating temperature range, Preventing image sticking
Temperature dependence of threshold voltage	High: 0.5V	Low: 0.1V	Wide operating temperature range
Temperature range for nematic phase	Narrow Under 100 (deg/C)	Wide Over 100 (deg/C)	Wide operating temperature range

5. Display function (Liquid crystal) and required properties

Fluorine-based LCDs are now capable of displaying moving images, which was not possible with cyanide-based LCDs, thus expanding the range of applications.

Table 2: Comparison of information to display between fluorine-based and cyano-based liquid crystals

Information to display	Cyano-based liquid crystal	Fluorine-based liquid crystal
Text & Graphics	Suitable	Suitable
Still Image	Can be used	Suitable
Video (TV, etc.)	Not suitable	Suitable
Application	Mainly Black and White type (Segment or Passive matrix) • Calculator, Watch (clock) • Simple indicator (Speedometer, etc.) • Old cell phones	Mainly full color type (Active matrix) • TV, Information Display • Current PC monitor (Note PC) • Navigation panel, Smartphone • Tablet, etc.
Usage environment (temperature range)	Mainly indoors	Possible outdoors

Table 2 shows that fluorinated liquid crystals are essential for video display applications.

5. Display function (Liquid crystal) and required properties

(4) Social impact when PFAS-based LCD cannot be used

1) Requirements for electronic displays in an advanced information society.

- An electronic display that converts and displays electronic information into visual information such as characters, graphics, and moving images is essential, and the following items shown in Table 1 are necessary.
 - Portability (small thickness): Measures against the freedom of installation
 - Support for large screens: Measures for increased amount of information and production of presence
 - Low energy consumption: Measures against global warming
 - High resolution: Measures for increased amount of information and production presence
 - Fast response: Measures for video compatible
 - High Contrast Ratio: Measures for Realism
 - High brightness: at least for normal indoor environments
 - Long product life: less waste
 - Availability, including price: penetration in the market
 - Repairability: less waste

2) LCD suitable for video using fluorinated liquid crystal material.

- The development of fluorinated liquid crystal materials (A kind of PFAS) has enabled LCDs to achieve a fast response that cannot be achieved with cyano-based liquid crystal materials, and a small change in driving voltage in response to temperature changes according to brightness of backlight. Those makes LCDs compatible with TV broadcasting (moving images). Cyano-based liquid crystal materials are used for display media that do not require moving images, such as calculators.

3) Current status of electronic displays

- LCDs using fluorinated liquid crystal materials have almost eradicated CRTs from the electronic display market due to their overall superiority over CRTs in terms of requirement 1) above. Although OLED is partially superior to LCD, it is inferior to LCD as a whole, so replacement from LCD is not progressing.

5. Display function (Liquid crystal) and required properties

■ Particular, the unavailability of LCDs would have a negative impact on society in the following respects

4) Low energy consumption

- The power consumption of a display with the same screen size as an LCD is 200% for a CRT and 130% for an OLED, as shown in Table 1. CRTs generate electron beams to illuminate light-emitting materials, and OLEDs require high voltages to drive current through light-emitting organic materials that are insulators. Both of these require high power consumption. When LCDs become unavailable, we have no choice but to change to CRT or OLED. This means an increase in energy consumption, which has implications for energy consumption reduction, climate change countermeasures, and energy security.

5) Product life

- LCDs are non-illuminated displays and consist of an LCD panel, which controls light transmission according to pixel information, and a light source 'backlight' is put behind the LCD panel.
 - A liquid crystal (LC) panel changes the transmittance of a pixel by controlling the alignment of LC molecules with a low voltage not supply any current. Since LC molecules do not degrade because their energy levels (or active states) do not change during operation.
 - Inorganic LEDs that emit light when current is applied are mainly used for the backlight of the light source. LEDs, which are semiconductors, have a longer lifetime than OLEDs and their peripheral circuits also have a longer life.
- Self-emitting displays such as OLEDs or CRTs convert the energy given to the pixels into light. Luminescent substances whose energy levels (or active states) are excited by the given energy are transformed into non-emitting light substances by chemical reactions without emitting due to a certain probability. As a result, the luminous brightness decreases with the passage of time of use. The light-emitting organic substances used in OLEDs decrease their brightness faster and their lifetime is shorter than light-emitting inorganic substances used in CRTs.

5. Display function (Liquid crystal) and required properties

6) Repairability

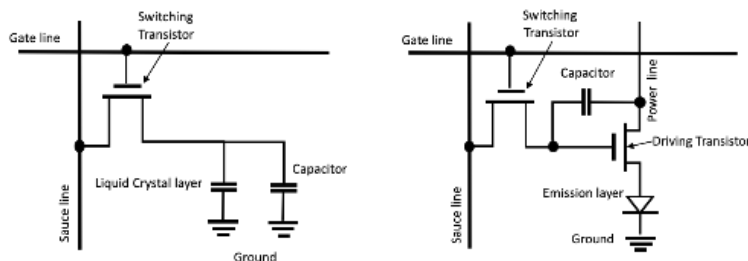
- Display failures can be broadly classified into physical or mechanical damage and component deterioration. Non-illuminated display LCDs consist of an LCD panel and a backlight, so any one of the failed components can be repaired or replaced. Deteriorated backlights can be replaced and components can be easily recycled. On the other hand, faulty repairs are not possible for self-luminous displays OLEDs and CRTs, which can only be replaced. Replaced self-luminous displays are not easily recyclable and become waste.

7) Availability

- CRTs are only produced for special purposes on a limited basis, and are not available for general use. However, the depth close to the display size is necessary, and it cannot correspond to the advanced information society. LCDs and OLEDs have transistors in pixels, but as described below, OLEDs have more complicated pixel transistors and wiring structures than LCDs, which is disadvantageous in terms of cost.

	LCD	OLED
Structure	1 transistor and 2 lines	2 transistors and 3 lines
Transistor	1. Switching A switching transistor which controls applied voltage to change the orientation of liquid crystal on the pixel	1. Switching A switching transistor which determines whether or not current flows through the pixel 2. Driving A driving transistor which adjusts the amounts of current to control the luminance of the emission layer
Line	1. Gate Control switching transistor 2. Source Apply voltage to liquid crystal	1. Gate Control switching transistor 2. Source Control Driving transistor 4. Power Apply current to emission layer

Pixel structure of LCD (left) and OLED (right)



(1) Safety and safety functions

Basic and as prerequisite elements and functions for EEE to ensure safe use of equipment and to minimize damage in the event of fire, etc.

(2) Required Properties for Parts and components

- Two or more high-reliability properties, such as heat resistance, flame retardance, chemical resistance and high airtightness (low gas permeability) must be achieved simultaneously in a single material.

e.g.) Cables, Tapes, Protective coatings, Encapsulants and Tubes (safe and reliable)

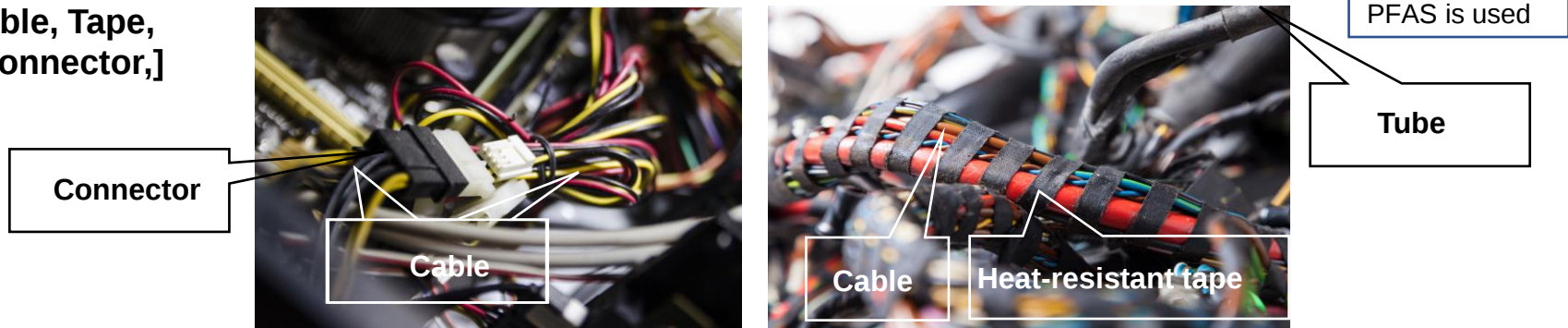
- Prevent dripping of resin components to minimize damage in the event of a fire (enhance flame retardant property)

e.g.) Equipment such as PCs and smartphones, Enclosures for power supplies, batteries, etc.,
Components that make up parts (Safety)

*() indicates achievable performance

<Application examples>

[Cable, Tape,
Connector,]

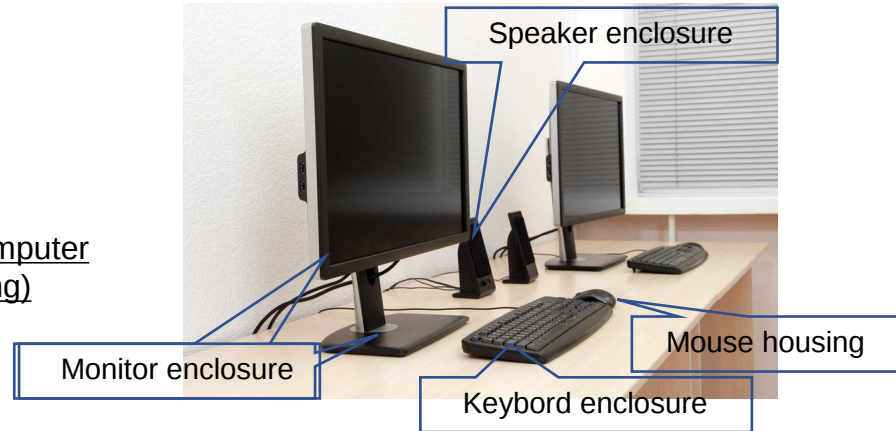


Cables, tubes, tapes, etc. (Covering ,Protective Material)

Insulation (low dielectric constant), bendability (flexibility), flame resistance, and resistance to heat and cold are essential for cables, and chemical resistance is required depending on the environment in which the cable is used. In particular, only fluoropolymers simultaneously achieve the high safety requirements of heat resistance, chemical resistance, insulation, and flame retardance.

<Application examples> [Anti-dripping agent]

e.g. : Personal computer
(equipment housing)



Anti-Dripping agent

Resins used for housings for TVs, PCs, etc. must be certified to UL94 (the Standard for Safety of Flammability). Especially for resins that require a high flame retardance above V-0 grade, it is necessary to prevent the generation of burning particles that can lead to ignition, and an anti-drip agent is indispensable. In order to increase the melt tension of low-viscosity resin, the anti-drip agent itself must have extremely high melt viscosity and be high flame-retardant, and only PTFE achieves these requirements.

(3) Required properties for materials and comparison with non-PFAS materials

■ Resins

Properties	Fluoropolymers				Other Resins			
	PTFE	FEP	PFA	ETFE	PVC	PEEK	PI (Film)	Polyolefin resin
Heat resistance Continuous use temperature, °C	260	200	260	150	60~105	180~200	150~200	90~125
Chemical resistance	◎	◎	◎	○	△	△ Oil-proof and Acid resistance NG	○	△ Solvent resistance NG
Flex resistance	○	○	○	◎	△ impact resilience	△ Too rigid	△ Too rigid	△
Cold resistance	○	○	◎	○	△	△~○	○	△~○
Electrical insulation (Dielectric constant, ε)	◎ (2.1)	◎ (2.1)	◎ (2.1)	○ (2.3~2.8)	△ (4~6)	△ (3.2~4.5)	△ (2.8~3.2)	△~○ (2.3~4)
Flame retardancy (Limiting oxygen index)	◎ (>95vol%)	◎ (>95vol%)	◎ (>95vol%)	○ (31vol%)	◎ (45vol%)	○	◎	△ Chemical resistance is reduced by flame retardant

◎=Superior; ○=Excellent; △=Usable; x=Not well suited for use

• Fluoropolymers have overwhelmingly excellent chemical resistance and insulation properties in addition to heat resistance and flame retardance. Since they also have a very low dielectric constant, they have excellent insulating properties per thickness, leading to thinner base materials, which in turn leads to smaller and lighter electrical and electronic equipment (energy saving).



• Fluoropolymers are more expensive than commonly used materials, and therefore they are not used blindly. They are only used selectively in applications where they cannot be substituted under severe conditions, even in required properties for safety and safety functions that are essential for EEE. (There is no alternative material because of selective use.)

■ Rubbers

Properties	Fluoroelastomers		Synthetic rubbers			
	FKM	FEPM	Silicone	EPDM	CR	NBR
Heat resistance max use temperature, °C	230	230	230	150	100	120
Chemical resistance	○	○	△	△	○	○
Ozone resistance	◎	◎	○	○	×	×
Cold resistance	△	△	△~○	△~○	△~○	△
Electrical insulation (Dielectric constant, ε)	△ (3~4)	△~○ (2.5~3.5)	△ (3.2~10)	△~○ (2.5~3.5)	×	×
Combustibility	◎	◎	△ Chemical resistance is reduced by flame retardant	△ Chemical resistance is reduced by flame retardant	○	△
Gas permeability (cc·cm/cm ² ·sec·atm)	1	1	400	15	15	3

◎=Superior; ○=Excellent; △=Usable; ×=Not well suited for use

- Fluoroelastomers, like fluoropolymers, have overwhelmingly excellent chemical resistance, ozone resistance, and insulation properties in addition to heat resistance and flame resistance, compared to other rubber. They also have excellent gas barrier properties (the smaller value, the less gas permeates.), so they are used in sealing materials (packing) that also require heat and chemical resistance and cannot be substituted.



- Fluoroelastomers are also more expensive than commonly used materials, and therefore they are not used blindly. They are only used selectively in applications where they cannot be substituted under severe conditions, even in required properties for safety and safety functions that are essential for EEE. (There is no alternative material because of selective use.)

6. Safety and safety functions and Required properties

(4) Social impact when PFAS cannot be used (example)

- 1) If fluoropolymers and fluoroelastomers cannot be used for safe and highly reliable components such as cables, protective tubes, sealing materials, and pipe,
 - The safety of electrical and electronic equipment cannot be guaranteed, which in turn places people and the environment in an unsafe situation.
 - Such components are widely used in sections that must simultaneously meet high reliability (safety) requirements such as heat resistance, insulation, flame resistance, and solvent resistance, especially in equipment for professional use (They are also used around engines of automobiles and other vehicles). Examples include industrial equipment such as EEE and other production equipment (heating furnaces, molding machines, robots, semiconductor manufacturing equipment, etc.), infrastructure equipment, medical equipment, and analytical instruments. Lack of equipment reliability also affects equipment life, including frequent maintenance and replacement, leading to increase of waste and, of course, a significant impact on work safety in professional use.

6. Safety and safety functions and Required properties

2) If PFAS cannot be used as an anti-drip agent,

- Resins used for housings of TVs, PCs, and other products, as well as resins used around power supplies and heat-producing component in electrical components, may be required by law to be certified to UL94; the Standard for Safety of Flammability. In order to satisfy these standards, the addition of flame retardants is definitely needed. Especially for resins that require a high flame retardance above V-0 grade, it is necessary to prevent the generation of burning particles that can lead to ignition, and an anti-drip agent is indispensable.
- In some cases that halogenated flame retardants are regulated by law, and inorganic flame retardants and phosphate ester flame retardants must be used, however, inorganic flame retardants require the addition of large amounts of flame retardants to achieve sufficient flame retardant effects, resulting in a loss of resin properties. On the other hand, phosphate ester flame retardants are limited to resins (that easily carbonize with oxygen) due to the flame retardant mechanism (formation of carbonized layer during combustion). Flame-retardant resins made from a polymer alloy of polycarbonate and styrene resin (PC/ABS) with a phosphate ester flame retardant are widely used in Home appliances and Office Automation equipments. However, phosphate ester flame retardants plasticize resins, causing them to drip more easily, so PTFE (a fibrillated fluoropolymer increases the melt tension of low viscosity resins and has an anti-dripping effect) must be added as a flame retardant aid in order to achieve V-0 grade. The addition of an anti-drip agent can also reduce the amount of flame retardant used.

7. Functional surface and required Properties

(1) Functional surface

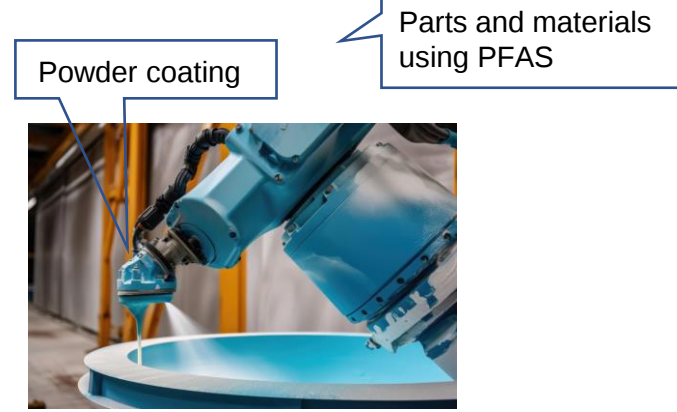
Essential functions for EEE, such as water-repellent, oil-repellent, non-adhesive, solvent-resistant, moisture-resistant, and weather resistant on surfaces touching with substances for the purpose of stain-proofing and protecting equipment.

(2) Required properties for materials used in parts and materials

- A newly high strength film such as heat resistant, solvent resistant, and water/oil repellent is formed on the surface of the base material.
 - ⇒ Baking coating of resin (powder coating) _Adding new functions where there is a requirement for film thickness and high durability. Base materials are limited to metals, ceramics, glass, etc. due to processing temperatures, and cannot be applied to plastics.
e.g.) Inner surface treatment of cooking appliances (high durability, safety), iron (high durability, high quality), Machines and Equipment (high durability, safety)
- In order to protect the functionality of equipment, a thin film is given to the surface of the base material to provide not only stain resistance but also weather resistance, moisture resistance, insulation properties, etc.
 - ⇒ Application coating : A film is formed by foaming and drying at room temperature, so it can be applied to a wide range of base materials.
e.g.) Touch panel protection (high durability), exterior protection of outdoor equipment (high durability), substrate circuit protection (high durability, safety)

<Application example>

[Cooking appliances]



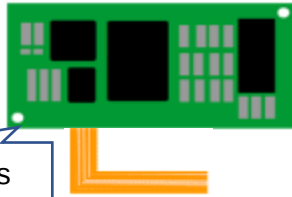
Inner pot and surface treatment of cooking appliances: Fluoropolymers baking coating (powder coating)

Inner pots and surface of cooking appliances require functions such as heat resistance to bear cooking temperatures, Antifouling for food baking and cleanliness, and anti-bacterial measures. In order to realize these functions at the same time, fluoropolymers baking coating is applied. Baking coating is a method of forming a film by applying fluoropolymers powder such as PTFE to a heat-resistant base material like metal, ceramic, or glass and heating, melting it to form a coating. In addition, it is the only material and method that can simultaneously ensure water and oil repellency, acid resistance, and non-adhesiveness, which are the characteristics of fluorine material. It's because fluoropolymers is baked on, it does not peel off by scratching and dissolve in water, oil, or seasonings, so it can be used safely for the life of the device, contributing to the reduction of waste during long-term use. In addition, fluorine treatment of cooking appliance prevents food from burning, which is said to be carcinogenic, and thus greatly contributes to human health.

This technology is also used in machinery and equipment for durability and safety purposes because, unlike general coatings, it can form coatings of several tens of micrometers or more.

<Application example>

[Printed circuit board]



Surface coatings

[touch panel]

When used as a coating or protective film on the surface of a touch panel, it must also satisfy the properties required in "Optical Properties (1. Optical Functions)".



Parts and materials using PFAS

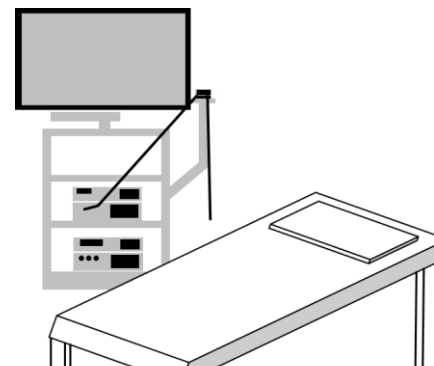
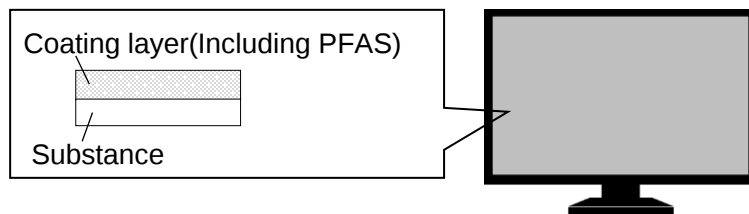
- Surface coatings
- Protective films

Protective coating of printed circuit board : applied coating

Printed circuit boards are the core of electrical circuits and are used in all kinds of electrical and electronic equipment. And environment these devices are used vary widely. In particular, for mobile devices such as smartphones and cameras, outdoor equipment, and in-vehicle equipment, measures must be taken to prevent migration caused by condensation owing to sudden temperature changes (such as moving from a cold outdoors to indoors), humidity caused by rain, etc. It is necessary to take measures to ensure reliability and safety, such as measures against short circuits due to sticking dust and measures against solvents to prevent leakage from electrolytic capacitors, batteries, etc. In addition to being water and oil repellent, fluorine materials are stain and moisture resistant, and have high solvent resistance and insulation properties that do not cause contact error. Therefore, there is no alternative material with equivalent performance, so fluorine materials are only for protective coatings for printed circuit boards.

<Application example>

[Optical film for liquid crystal display]



“Molecular orientation” and “Film thickness control”

in optical film materials for liquid crystal displays : Coating

Fluorine materials are used as coating agents in coating layers in optical films for liquid crystal displays. Since the fluorine atom has highest electronegativity, the fluorine material is characterized by having a low surface tension. The high optical performance required for optical films for liquid crystal displays can be achieved by low surface tension, which is a major feature of fluorine materials.

Technologies required for optical films for LCD displays

(1) Control of coating layer thickness

The coating layer can be applied evenly due to the low surface tension and wettability with the coating layer substrate.

(2) Control of molecular arrangement in coating layer

Due to its low surface tension and hydrophobicity, the fluorine-containing coating agent is unevenly distributed on the surface, resulting in uniform alignment of molecules in adjacent coating layers.

It is difficult to meet the required performance without fluorine materials, and as a result, we are concerned that it will become difficult to supply displays not only for consumers but also for medical devices within the EU.

<Application example>

[Optical sensor]

Functional surface coating used for optical sensors in ink cartridges

In order for an optical sensor to perform its functions with high precision, the surface of the sensor's light-emitting and light-receiving element must have good separation from the liquid to be detected (water-based ink), that is, it must be a water-repellent surface.

This sensor detects when the liquid container is not empty and stops the product before it is damaged. The surface of the element must be kept clean at all times because the amount of remaining liquid is detected by the difference in the light absorption rate of the liquid or air.

The fact that the optical sensor remains clean allows the printer to perform accurate ink detection from the ink cartridge.

In addition to the water-repellent function, this coating must also satisfy optical properties (1. Optical function/2.transparency and low refractive index) because it is a sensor that uses light, and these two required properties must be met. PFAS is the only material that satisfies both requirements and is indispensable for highly accurate remaining amount detection technology as an optical sensor.

It is essential that the liquid on the optical sensor flows smoothly in order to grasp the remaining amount, but the silicone type has insufficient water repellency (higher surface free energy than fluorine type) and abrasion resistance. Because of its poor performance, it was unable to meet the technical characteristics required for the lowest line of optical sensors.

(3) List of required properties for materials and general physical properties

■ Resin baked coating (powder coating))

Properties	Fluoropolymer	Epoxy resin	Polyester resin	plating	DLC
Heat resistance max use temperature, °C	~350°C	~200°C	~230°C	◎	◎
Abrasion resistance	○	△	△	○	○
Water and Oil-repellent property	○	×	×	×	×
Chemical resistance	○	○	×	○	○
Weather resistance	○	×	○	○	○
Note	Since the film thickness is 30 μm or more, the base material with high strength and excellent durability is limited, and a dedicated factory (dedicated supplier) is required.			When the means are changed, the performance as an inorganic film can be secured, but the surface wetting performance is NG.	

○=Excellent; △=Usable; ×=Not well suited for use

- Powder coating has characteristic of high strength and durability of the coating film, and is often used for home appliances, industrial equipment, medical equipment, automobile parts, etc. fluoropolymers are excellent in all performances, but because of their high heat resistance, the treatment temperature during processing is high, and they are also expensive as materials, so they are appropriately selected and used according to the purpose.
- Fluoropolymers is often used in home appliances, especially in kitchen equipment. As alternative technology there is DLC, plating, but these films do not have water and oil repellency, so they do not meet the required properties.
- In the case of Fluoropolymers, they have not only baked coating but also chemical resistance, so it does not leach into water or oil, and has no environmental impact.
- Ensuring durability through high coating film strength extends product life and contributes to waste reduction.

7. Functional surface and required Properties

■ Application coating

Properties	Fluoropolymers		Silicone	Acryl	Urethane
	Resin-type	Modified silane-type			
Heat resistance	○	○	○	×	×
Abrasion resistance	○	○	△	×	○
Water and Oil-repellent property	○	○	○~△	×	×
Moisture resistance	○	○	×	△	△
Electrical insulation	○	○	△ (Risk of contact failure by low-molecular weight siloxane)	○	○
Chemical resistance	○	○	○	△	△
Weather resistance	○	○	○~△	×	△
Light permeability	○	○	△	○	△

○=Excellent; △=Usable; ×=Not well suited for use

- Fluorine materials satisfy most of the performance requirements, but they are very expensive, so they are used only in carefully selected cases when multiple performance requirements must be satisfied at the same time. Therefore, because it is used out of necessity, it is used in applications in which other materials cannot be substituted.

- Adding functions and modifying surfaces by coatings is used to improve durability, ensure safety, and prevent failures of equipment use, extend product life and contribute to reducing waste.



- Fluoropolymer is more expensive than common materials, so fluorine materials should not be used thoughtlessly. It is necessary to achieve multiple required performances at the same time, and it should be used carefully only in applications where it cannot be replaced (fluorine materials are essential so there is no alternative material).

7. Functional surface and required Properties

(4) Social impact when PFAS cannot be used (example)

1) When fluorine resin cannot be used for cooking equipment

- The inner pot and inner walls of cooking equipment are heat resistant to withstand cooking temperatures, stain resistant to prevent food from burning and to ensure cleanliness. Antibacterial measures are necessary.

In order to realize these at the same time, a fluororesin baking coating is applied.

Because the fluororesin is baked on, it does not peel off due to scratches, etc., and does not dissolve in water, oil, or seasonings, so it can be used safely for the life of the device, contributing to the reduction of waste during long-term use. PFAS-coated kitchen utensils prevent food from burning and thus helps avoiding unnecessary health risks associated with burned food (carcinogenicity).

- Powder coating is performed at dedicated factories (suppliers), so eliminating it out of the blue would deprive suppliers of their livelihood. Also, if the process (plating, DLC) is changed to powder coating, a large investment will be required due to the supply-demand balance, and it will not be possible to replace it immediately because it also requires a dedicated factory (supplier).

2) When fluororesin cannot be used for printed circuit boards

- Printed circuit boards are the core of electrical circuits and are used in all kinds of electrical and electronic equipment, and the environment in which they are used depends on the environment in which they are used.

A wide variety. In particular, mobile devices such as smartphones and cameras, devices installed outdoors, and devices installed in cars may be exposed to sudden temperatures.

Migration countermeasures against condensation due to temperature changes (such as moving from cold outdoors to indoors) and humidity due to rain, etc.

Countermeasures against short circuits due to adhesion of dust, etc., countermeasures with solvents in case of liquid leakage from electrolytic capacitors, batteries, etc. It is necessary to take measures to ensure reliability and safety. In addition to being water and oil repellent, fluorocarbon materials are stain and moisture resistant, and have high solvent resistance and insulation properties that do not cause contact abnormalities. Therefore,

there is no alternative material with equivalent performance, so fluorocarbon materials is essential for protective coatings on printed circuit boards.

- It has been discovered that a substance related to PFHxA is used as a coating agent for printed circuit boards.

In May 2022, SEAC's final draft of the PFHxA restriction study concluded that "Functional coatings used in electrical and electronic equipment shall not be applied until XXXXXX [7 years after entry into force]" as a conclusion of the socio-economic impact assessment.

Based on this result, we believe that functional coatings that use substances related to PFHxA should be unconditionally exempted.

"Regarding the use of PFAS in the semiconductor industry, we strongly request the 13.5 years derogation presented by ECHA. In addition, as there are many cases where there is no prospect of a replacement product at present, it is fully expected that a replacement product cannot be developed within the 13.5 years period. Therefore, we request that a system be established to apply for derogation for 13.5 years or longer."

Many reports have been published on semiconductors, focusing on PFAS. Please obtain them from the following URL and consider them.

[PFAS - Semiconductor Industry Association \(semiconductors.org\)](https://www.semiconductors.org/pfas/semiconductor%20Industry%20Association%20(semiconductors.org))

- The Impact of a Potential PFAS Restriction on the Semiconductor Sector

Case Study

- PFOS and PFOA Conversion to Short-Chain PFAS Used in the Semiconductor - Manufacturing
- PFAS-Containing Surfactants Used in Semiconductor Manufacturing
- PFAS-Containing Photo-Acid Generators (PAGs) Used in Semiconductor Manufacturing

White Paper

- Background on Semiconductor Manufacturing and PFAS
- PFAS-Containing Fluorochemicals Used in Semiconductor Manufacturing Plasma-Enabled Etch and Deposition
- PFAS-Containing Heat Transfer Fluids (HTF) Used in Semiconductor Manufacturing
- PFAS-Containing Materials Used in Semiconductor Manufacturing Assembly Test - Packaging and Substrate Processes
- PFAS-Containing Wet Chemistries Used in Semiconductor Manufacturing
- PFAS-Containing Lubricants Used in Semiconductor Manufacturing
- PFAS-Containing Articles Used in Semiconductor Manufacturing

9. Thin film device production process and required Properties

The manufacturing process for thin film devices is the same process as for semiconductors and MEMS. Therefore, as part of semiconductors, the same requirements must be exempted. Many reports have been published on the requirements for the process in semiconductors, so please review them and consider them.

[PFAS - Semiconductor Industry Association \(semiconductors.org\)](https://www.semiconductors.org/pfas/semiconductor%20Industry%20Association%20(semiconductors.org))

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White Paper

- Background on Semiconductor Manufacturing and PFAS
- PFAS-Containing Fluorochemicals Used in Semiconductor Manufacturing Plasma-Enabled Etch and Deposition
- PFAS-Containing Heat Transfer Fluids (HTF) Used in Semiconductor Manufacturing
- PFAS-Containing Materials Used in Semiconductor Manufacturing Assembly Test - Packaging and Substrate Processes
- PFAS-Containing Wet Chemistries Used in Semiconductor Manufacturing
- PFAS-Containing Lubricants Used in Semiconductor Manufacturing
- PFAS-Containing Articles Used in Semiconductor Manufacturing

10. Energy supply (Battery) and required Properties

46

Please refer to the energy sector.

And please consider excluding the battery since it is essential for electrical and electronic equipment.

11. Refrigerant function (Refrigerant gas) and required Properties

Please refer to the Fluorinated gases sector.

And please exclude Fluorinated gases for electrical and electronic devices.

This is because Fluorinated gases is essential for electrical and electronic equipment in the manufacturing process and in the operation of the equipment.