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CEIR Answer to Echa consultation on PFAS restriction: Annex Question 7. 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

Application (no finished list)	Use	Property	PFAS
Valves 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
Valves in food industry	Coatings, seals,	Non-sticking properties Resistance against aggressive cleaning chemicals	PTFE, PFA, FKM
Valves in other industries	Seals, gaskets, diaphragms, cables, coatings, wear parts, bearings, ...	Resistance against chemicals, temperature, weather, or a combination thereof. → Safety.	PTFE

- Mining industry - Drinking water		Use due to tribological functionality. → energy efficiency, duration, safety Use due to hygienic aspects. → health	FKM FFKM FPE (PFPE) ETFE ECTFE PVDF PFA PCTFE
Sanitary faucets in private and public use	Seals, gaskets, diaphragms, cables, coatings, wear parts, bearings, ...	Use due to tribological functionality. → energy efficiency, longevity, duration, sustainability	PTFE
Sanitary faucets in private and public use – high performance lubrication grease	High performance lubrication grease	Use due to tribological functionality. Low coefficient of friction → energy efficiency, longevity, duration, sustainability	PTFE