



SUBMISSION DOCUMENT FOR PUBLIC CONSULTATION

Potential restriction of the per- and polyfluoroalkyl substances (PFAS) related to precision polymeric parts and shapes used in high performance industrial operating environments

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Submission document for public consultation of the potential restriction of the per- and polyfluoroalkyl substances (PFAS) related to precision polymeric parts and shapes used in high performance industrial operating environments - Kalrez® perfluoroelastomer parts, Zalak® high performance seals, and Vespel® parts and shapes

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ABBREVIATIONS

BEVs	Battery Electric Vehicles	IQ	Installation Qualification
CA	Competent Authority	MST	Manufacturing System Test
Ca.	Circa	NBR	Nitrile Butadiene Rubber
CLP	Classification, Labelling and Packaging	NPV	Net Present Value
CPI	Chemical Processing Industry	OECD	Organization for Economic Co-operation and Development
CoF	Coefficient of Friction	OQ	Operational Qualification
CVT	Continuously Variable Transmission	PFA	Perfluoroalkoxy Polymer
EBIT	Earnings Before Interest and Taxes	PFAS	Per- and Polyfluoroalkyl Substances
ECHA	European Chemicals Agency	PHEVs	Plug-in Hybrid Electric Vehicles
EEA	European Economic Area	PMT	Persistent, Mobile, and Toxic
EGR	Exhaust Gas Recirculation	PTFE	Polytetrafluoroethylene
EU	European Union	PQ	Performance Qualification
EUR	Euro (currency)	PV	Pressure-Velocity
EV	Electrical Vehicle	RAC	Committee for Risk Assessment
FCEV	Fuel Cell Electric Vehicles	RGD	Rapid Gas Decompression
FFKM	Perfluoroelastomers	R&D	Research and Development
FKM	Fluoroelastomers	REACH	Registration, Evaluation, Authorisation and Restriction of Chemicals
FTE	Full Time Employee	SEAC	Committee for Socio-Economic Analysis
FVMQ	Fluorosilicone Rubber	SVHC	Substance of Very High Concern
GDP	Gross Domestic Product	VMQ	Vinyl Methyl Silicone
GVA	Gross Value Added	VPvM	Very Persistent and Very Mobile
H₂S	Hydrogen Sulfide	wt%	percentage by weight
HNBR	Hydrogenated Nitrile Butadiene Rubber		
ICE	Internal Combustion Engine		
IP	Intellectual Property		

1. SUMMARY

This section starts with a brief description of the regulatory **context and purpose** of the document. It then provides a **short summary of the relevant product lines** of DuPont – Kalrez® perfluoroelastomer parts and Vespel® parts and shapes and their main applications, followed by a short description of the **methodology** applied. It then concludes with the **important summary of the main findings, followed by the request of DuPont for derogations justified by the evidence in this document.**

This document is the **second submission** of DuPont within this Public Consultation. While the first submission covered key topics of interest, the additional data for areas that were absent during the first submission has been collected now and added in this document (i.e., emissions and socio-economic impacts) - **all additions in this second submission compared to the first submission are highlighted in light green.** Therefore, this second submission contains **further information regarding environmental, social, and business impacts as well as a more detailed description of the derogations requested. Information to questions 2, 3, and 5 is supplied in this submission. Specifically, the following:**

- 5.2. Environmental emissions of Vespel® parts and shapes: Manufacturing, in-use, and end-of-life,
- 5.3. Environmental emissions of Kalrez® perfluoroelastomer parts,
- 5.6. Social impacts for the manufacturer: Unemployment,
- 5.7. Cost-effectiveness ratio,
- 5.8. Socio-economic impacts identified by downstream users,
- 6. Overview of other stakeholders and their relevance to this submission.

The Kalrez® and Vespel® businesses are an important part of Dupont's portfolio within the EEA. This document provides details on how important fluorinated substances are to these businesses, and for DuPont's customers in the chemical processing, transportation (including aerospace), semiconductor manufacturing, military and defence, petroleum and mining, energy (i.e., hydrogen and natural gas), and industrial manufacturing market segments. The Kalrez® and Vespel® business have been producing fluoropolymer containing parts for over 50 years, and these parts have helped build our modern technological world. Fluoropolymer components in Kalrez® perfluoroelastomer parts and Vespel® parts and shapes improve fuel efficiency in aircraft and automotive vehicles and support the transformation of our power infrastructure from a fossil fuel economy into a renewable energy economy necessary due to climate change. Kalrez® and Vespel® products are critical for managing chemical emissions in industrial chemical processes from a wide variety of chemicals. They also play critical roles in semiconductor fabrication, both in containing toxic chemical environments and preventing defects in integrated circuits.

The Kalrez® and Vespel® businesses are not the only business at stake within the EEA. A review of the Annex XV call for derogations has initiated a significant response from the industrial community. As of the 16th of August 2023, comments for derogations for fluoropolymers comprise the bulk of submissions for products that support similar markets as those detailed in this report. Some of those submissions are from DuPont customers within the EEA, some are competitors supplying the same customers and well as additional customers, and some are for applications not supported by the Kalrez® and Vespel® businesses but also requiring fluoropolymers. Kalrez® perfluoroelastomer parts and Vespel® parts and shapes that contain large fluoropolymer content gain significant function from the properties of fluoropolymers (i.e., chemical resistance, thermal stability, low friction) with often multiple properties being required for a single application. Applications such as aerospace, transportation, and chemical industry are highly regulated, and qualification typically requires long

time due to these regulations. Existing qualification schedules are designed to ensure the safety of workers and society. Therefore, this document aims to add clarity to the proposed Annex XV legislation and provides the basis for enabling the spirit of this legislation without regrettable societal consequences.

1.1. Purpose

On 13 January 2023, the Competent Authorities (CAs) of the Netherlands, Germany, Sweden, Denmark, and Norway submitted a joint proposal to ECHA for a broad restriction under REACH of a group of per- and polyfluorinated substances (PFAS) within the EU unless derogations are granted. The proposed restriction aims to limit the risks to the environment and human health from the manufacture and use of a wide range of PFAS due to their persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) properties. All PFAS in scope of this restriction proposal are meant to be either persistent themselves or degrade to other persistent PFAS. The opinion-development phase at ECHA takes 12 to 15 months. After this, the proposal, and the opinions of RAC and SEAC are forwarded to the Commission for decision-making by the Commission with the Member States. The entry into force of a potential restriction is anticipated to take place in 2025 and become effective in 2026/2027.

PFAS are a group of more than 10,000 synthetic (i.e., man-made) chemicals. PFAS have been produced in large quantities and used in a variety of industrial, commercial, and consumer applications since the late 1940s.^{1, 2, 3} In the proposed restriction, PFAS (Per- and Polyfluoroalkyl Substances) are defined as any substance containing at least one fully fluorinated methyl (CF₃-) or methylene (-CF₂-) carbon atom (without any hydrogen, chlorine, bromine, or iodine attached to it). The definition is based on Organisation for Economic Co-operation and Development (OECD) definition of PFAS⁴ published in 2021 and covers over 10,000 PFAS, including some fully degradable subgroups, which would be restricted under the current draft Annex XV report unless a derogation is granted.

In this regard, the restriction proposal⁵ highlights two potential restriction options (ROs) referred to as RO1 and RO2.

- RO1 entails a full ban on PFAS chemicals, covering their usage, manufacturing, and placing on the market in the EU with no derogations and a transition period of 18 months from the entry into force of the restriction.
- RO2 covers the same scope of restriction while introducing specific time-limited derogations. In addition to an 18-month transition period, it would allow for either 5- or 12-year derogation period, depending on the application.

¹ Banks, R.E., Smart, B.E., Tatlow, J.C., 1994. Organofluorine chemistry: Principles and commercial applications. New York (NY): Plenum. 670 p. ISBN 978-1-4899-1202-2.

² Kissa, E., 2001. Fluorinated Surfactants and Repellents, 2nd Edition, CRC Press. ISBN 9780824704728.

³ Buck, R.C., Franklin, J., Berger, U., Conder, J.M., Cousins, I.T., de Voogt, P., Jensen, A.A., Kannan, K., Mabury, S.A., van Leeuwen, S.P., 2011. Perfluoroalkyl and polyfluoroalkyl substances in the environment: Terminology, classification, and origins. *Integr. Environ. Assess. Manag.* 7, 513–541.

⁴ <https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/terminology-per-and-polyfluoroalkyl-substances.pdf> (Accessed in May 2023).

⁵ <https://echa.europa.eu/documents/10162/f605d4b5-7c17-7414-8823-b49b9fd43aea> (Accessed in May 2023).

1.2. Focus - Kalrez® perfluoroelastomer parts and Vespel® parts and shapes

This analysis focuses on the value of specific PFAS related to fluoropolymer-containing and/or based Vespel® parts and shapes and Kalrez® perfluoroelastomer parts in high performance operating environments for industrial use in the European Economic Area (EEA) market. It has been performed by EPPA⁶ at the request of DuPont Specialty Products Operations Sàrl and its affiliates (DuPont), in view of providing regulators with strong evidence-based findings on the social and economic impacts that are expected to occur should these substances be restricted under REACH.

Fluoropolymers like PTFE, PFA, FKM, and FFKM are categorized as per- and polyfluoroalkyl substances (PFAS) according to the OECD definition. In the current EU REACH regulation, all polymers, including fluoropolymers, are exempted from the registration requirements. This exemption is based on the understanding that polymers generally have lower levels of toxicological concerns compared to non-polymeric substances. This is attributed to their high molecular weight, which restricts their ability to pass through biological membranes, resulting in a low potential for toxicity.⁷ Fluoropolymers have unique physical and chemical properties that set them apart from other members of the PFAS family, resulting in specific toxicological and environmental characteristics. Fluoropolymers as a group have negligible residual monomer and oligomer content and low to no leachable content. With a number-average molecular weight well over 60,000 Da, fluoropolymers cannot cross cell membranes. It is also important to note that due to their high cost of manufacturing, fluoropolymer products often come with a higher cost compared to other alternatives. As a result, they are typically employed in situations where there are limited or no viable substitutes and alternatives available.⁸

Three of DuPont's product lines, Kalrez® perfluoroelastomer parts, Zalak® high performance seals and Vespel® parts and shapes, heavily rely on specific substances within the scope of potential PFAS restriction proposal. More specifically:

- **Kalrez® perfluoroelastomer parts** are engineered to deliver superior thermal stability, chemical resistance, and sealing effectiveness. The following fluoropolymers are being used in Kalrez® perfluoroelastomer parts:
 - Perfluoroelastomer (FFKM) is a rubbery fluoropolymer with a combination of thermal and chemical stability that is unmatched by any other elastomer. It constitutes the fundamental (50 – 97 %) constituent of all Kalrez® perfluoroelastomer parts.
 - Perfluoroalkoxy polymer (PFA) is another type of fluoropolymer which is used as a reinforcing filler within the FFKM polymer matrix in order to achieve the end user performance criteria while maintaining similar thermal and chemical resistance as the FFKM.

⁶ <https://www.eppa.com/>

⁷ American Chemistry Council, Inc., 2022. New Study Demonstrates Vast Majority of Commercial Fluoropolymers Meet Criteria for Polymers of Low Concern Designation. Available at: <https://www.americanchemistry.com/chemistry-in-america/news-trends/press-release/2022/new-study-demonstrates-vast-majority-of-commercial-fluoropolymers-meet-criteria-for-polymers-of-low-concern-designation> (Accessed in July 2023).

⁸ Henry, B. J., et al., 2018. A critical review of the application of polymer of low concern and regulatory criteria to fluoropolymers. *Integrated Environmental Assessment and Management*, 14(3), 316-33.

- Polytetrafluoroethylene (PTFE) is another type of fluoropolymer which is used as a reinforcing filler within the FFKM polymer matrix in order to achieve the end user performance criteria while maintaining similar thermal and chemical resistance as the FFKM.
 - Fluoroelastomer (FKM) is another type of fluoropolymer which can be used in a composite layer form with FFKM for customer performance requirements. Zalak® high performance seals are also FKM.
 - Kalrez® perfluoroelastomer parts are used as sealing elements in the form of o-ring or custom seal geometries in various mechanical parts, shaft bearings, bushings, T-Seals, boots, chevron stacks, KVSP™ V-rings, packing systems, valves, pumps, wireline and drilling tools, mechanical seals in rotating equipment (e.g., pumps, mixers), compressors, filters, couplings, spraying heads, cleaning installations, dosing systems, sampling systems, filling equipment, centrifuges, instrumentation (e.g., level gauges, flowmeters, gas analysers, laboratory equipment), fuel burners, ozonators, bonded door, poppet valves, plasma chambers, isolation valves, wafer handling, viewports, gas line feeds, gas injection, and electrostatic chucks.
 - **The industries in which Kalrez® perfluoroelastomer parts are used are chemical processing (including processing in the pharmaceutical industry), transportation (including aerospace), semiconductor manufacturing, military and defence, petroleum and mining, and energy (i.e., hydrogen and natural gas). The manufacturing of DuPont perfluoroelastomer polymer and Kalrez® finished parts occurs only outside of the EU.**
 - Zalak® high performance seals are used primarily in the semiconductor manufacturing industry. It has been specifically formulated for minimal particle generation and contamination in gas deposition processes.
- **DuPont's Vespel® parts and shapes** exhibit exceptional temperature resistance, mechanical strength, chemical resistance, and resistance to wear. The following fluoropolymers are being used in Vespel® parts and shapes:
 - Polytetrafluoroethylene (PTFE) is being used as a polyimide processing aid for direct form parts, a fabric ingredient for various composite grades/parts, a filler for one grade, and external mould release for various composite parts.
 - Perfluoroalkoxy polymer (PFA) is another type of fluoropolymer which is compounded with carbon fibre for applications such as valves, pumps, fittings, and seals for oil and gas industry and for semiconductor, applications in wafer cleaning and resist stripping operations, as well as some flat panel display and dry plasma applications.
 - Fluorinated polyimide resins (containing 6FTA/6FDA), e.g., NR-150 Resin (2016-76-0(6FTA)) and PMR-II-50 are high temperature resins formulated for composite systems.
 - **The industries using Vespel® products are: chemical processing, transportation (including aerospace), semiconductor manufacturing, military and defence, petroleum and mining, energy (i.e., hydrogen and natural gas), and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/ plasma/ cutting tools). The manufacturing of Vespel® occurs both within and outside of the EU.**

As indicated above, while Vespel® parts and shapes and Kalrez® perfluoroelastomer parts are used in various high performance operating environments, this analysis will focus on the use of PFAS in the following industries:⁹

DuPont's products	Industry	PFAS use
Vespel®	- Transportation, including Aerospace - Petroleum and Mining - Chemical Processing - Semiconductor Manufacturing - Other Industrial Manufacturing - Energy - Military and Defence	- PTFE - PFA - NR-150 Resin (2016-76-0(6FTA)) - PMR II-50 Resin
Kalrez® Zalak®	- Transportation, including Aerospace - Petroleum and Mining - Chemical Processing - Semiconductor Manufacturing - Other Industrial Manufacturing - Energy - Military and Defence	- FFKM - FKM - PTFE - PFA

1.3. Methodology

The assessment has been **conducted in accordance with the existing official guidance of ECHA under REACH¹⁰** and it is based on information and data gathered from DuPont as a manufacturer of:

- Vespel® parts and shapes that use PFAS in its manufacturing process and products, and
- Kalrez® perfluoroelastomer parts.

This analysis gathers technical and economic information to describe in both qualitative and (if feasible) quantitative terms, the (order of magnitude of) impacts to affected industries as well as to the EEA supply chains and society that are expected from the ban of PFAS. In particular, this analysis covers the importance of the PFAS at the different stages of the manufacturing process of parts that are used in these industries previously mentioned. The report also covers an analysis of alternatives and shows the lack of availability of technologically suitable and economically viable alternatives, the technical difficulties associated with the substitution of PFAS via alternatives, the social and economic impacts from their restriction, and the broader impacts to society.

The assessments presented in this report are as close to real data or to perception of future changes as possible to have using conservative estimates, always putting the protection of human health and environment first.

⁹ Thus, please note that this assessment provides a non-exhaustive overview of the applications of Vespel® parts and shapes and Kalrez® perfluoroelastomer parts in high demanding industrial operating environments. Applications are not limited to the discussed industries in this assessment.

¹⁰ The ECHA Guideline for SEA for the restriction proposals is available at:
https://echa.europa.eu/documents/10162/23036412/sea_restrictions_en.pdf/2d7c8e06-b5dd-40fc-b646-3467b5082a9d

1.4. Main findings

DuPont's commitment to research and development has led to the creation of high-performance materials, including their Vespel® parts and shapes and Kalrez® perfluoroelastomer parts product lines.

The proposed restriction on the use of PFAS, **would prohibit the manufacturing of Vespel® parts in the EEA and importing PFAS-containing Vespel® parts and shapes. The import of Kalrez® perfluoroelastomer parts in the EEA would also be prohibited.** The large number of EEA industries that rely on Vespel® parts and shapes and Kalrez® perfluoroelastomer parts in their industrial operating environments, such as **chemical processing (including processing in the pharmaceutical industry), transportation (including aerospace), semiconductor manufacturing, military and defence, petroleum and mining, energy (i.e. hydrogen and natural gas), and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/ plasma/ cutting tools)** would all be halted. **A full PFAS ban would eliminate the ability to supply into the market for these high performing materials within the EEA. This would have dire consequences on industrial operating environments that rely on these products.**

Industrial operating environments heavily rely on the use of Kalrez® perfluoroelastomer parts and Vespel® parts and shapes, which contain or depend on fluoropolymers such as FFKM, PTFE, FKM, and PFA.

Kalrez® perfluoroelastomer parts

- **Kalrez® perfluoroelastomer parts** are engineered to deliver superior thermal stability, chemical resistance, and sealing effectiveness.
- **The manufacturing of DuPont perfluoroelastomer polymer and Kalrez® finished parts occurs only outside of the EU.**
- The analysis of alternatives concludes that there are currently no technically suitable nor economically feasible alternatives readily available to substitute fluoropolymers such as PTFE, PFA, and FFKM while providing comparable product performance benefits.
 - **For Kalrez® perfluoroelastomer parts, and Zalak® high performance seals, alternative materials do not offer the desired combination of thermal stability and chemical resistance for reliable sealing in critical dynamic and static applications. This then leads to issues such as leakage, process contamination and part failures.** In the case of in-kind alternatives (non-fluoropolymer elastomeric materials), their performance falls significantly behind the incumbent fluoropolymer. They are unable to meet the critical requirements of applications that demand high temperature and/or high chemical resistance. While not-in-kind alternatives may offer similar heat and chemical resistance (e.g., metal), they lack the level of elastic resistance (resilience) needed to properly seal in the demanding application, resulting in ineffective sealing, shorter life, and an overall poor performance in the application. **This poses safety risks as well as environmental and health hazards due to**

equipment failure. In addition, their much higher stiffness would require a complete redesign of the hardware, when possible, which translates into time, costs, and compromises to the overall integrity of the system.

- **Without any derogation related to FFKM (perfluoroelastomer) or FKM a PFAS restriction would result in a complete loss of sales and profits related to the import of Kalrez® perfluoroelastomer parts in the EEA due to the lack of suitable alternatives. For the past 50 years, there have been no new inventions or successful developments to replace FFKM.**
- **Without a long enough derogation related to fluorinated polymerization aids for FFKM, it would result in a complete restriction of FFKM. The current proposal is 6.5 years for fluorinated polymerization aids. If a suitable alternative for the fluorinated polymerization aids for Kalrez® perfluoroelastomer parts can even be found, the research and development (R&D) process for finding non-fluorinated polymerization aids for Kalrez® is estimated to take at least 15 years. The manufacturing sites for Kalrez® are located outside of the EU. Therefore, the primary impact of the potential EU PFAS restrictions would be discontinued use of Kalrez® perfluoroelastomer parts in EU industries that rely on these high performance perfluorinated elastomers today.**

Vespel® parts and shapes

- **DuPont's Vespel® parts and shapes** exhibit exceptional temperature resistance, mechanical strength, chemical resistance, and resistance to wear.
- **The manufacturing of Vespel® parts and shapes occurs both within and outside of the EEA.** Table 1 below presents the grade families of Vespel® parts and shapes, PFAS use as well as their relevant application examples (*please note that this table is based on the Table 2-1 Grades of Vespel®, composition and applications from the Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain*).¹¹

Table 1: Grade families of Vespel® parts and shapes, composition, and applications.

Vespel® grade family	Description (Mfg Process where PFAS used)	Applications	PFAS Functionality in parts
Vespel® CP	Composites with any 1 or more of the following uses: 1) PTFE reinforced fabrics 2) Fluorine containing polyimides 3) PTFE mould release	Aircraft wear strips and track liners used for low friction gliding in applications such as wing frame braking and engine nacelles. Used where high temperature prohibits use of oil lubrication, or where oil/grease lubrication would pick up dirt and form an abrasive mass.	Fabrics: Self-lubricating, low friction gliding, vibration resistance, chemical resistance to greases, fuels, and de-icing fluids. Used where high temperature prohibits use of oil lubrication, or where oil/grease lubrication would pick up dirt and form an abrasive mass. Fluorine containing polyimide resin: Hi temperature resin (the trifluoromethyl groups on the 6FTA monomer result in

¹¹ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

		Aircraft bushings, bumpers, washers. Industrial applications include Wind Energy liners and spherical bearings in transportation (military and beyond)	the classification of this polymer as a PFAS). External Mould Release: used where needed for part release; no part functionality.
Vespel® ASB*	Assembled parts consisting of fastened or bonded composites on metal components (e.g., wear strips on metal to make track liners)	Bonding composites for metallic structures	The composite part of the component will have the same functionality as Vespel® CP grades.
Vespel® SP, ST	Direct form polyimide-based parts and components 1) PTFE Processing aid or 2) Couple Grades (SP-211, SP-221) have Higher PTFE content ingredient	For lubricated and non-lubricated, low friction and wear applications. Valve seats, seals, bearings, washers, seal rings, business in aerospace, automotive, commercial off-road vehicles such as construction, farming, mining vehicles, industrial manufacturing including automotive, chemical processing, and other industrial processing equipment.	PTFE has no functionality in the final part; however, it is a critical processing aid lubricant. Without PTFE Vespel® direct form parts cannot be manufactured. In some grades (SP-211) a higher PTFE content provides low friction properties (per ASTM D6456-10 ¹² and SAE Aerospace Material Specifications (AMS) 3644G).
Vespel® SCP	Direct form polyimide-based parts and components with PTFE processing aid	Increased thermal oxidative resistance and mechanical properties over Vespel® SP. Improved chemical resistance and friction performance. Aerospace applications: Washers, bumpers, wear pads and bushings Transportation and Industrial uses where high temperature or increased performance over Vespel® SP is required.	PTFE has no functionality in the final part; however, it is a critical processing aid lubricant. Without PTFE Vespel® direct form parts cannot be manufactured.
Vespel® CR	Carbon-fiber filled thermoplastic fluoropolymer, Perfluoroalkoxy polymer(PFA)	Oil and Gas: applications such as valves, pumps, fittings, and seals. Semiconductor manufacturing: applications in wafer cleaning and resist stripping some flat panel display and dry plasma applications. Performs in aggressive wet chemical / plasma conditions and elevated temperatures.	Chemical resistance and extended life for oil and gas, and wet processing in semiconductors. Good ultraviolet (UV) resistance in Flat Panel Display applications. In dry plasma applications, Vespel® CR-6110 has been used as a thermal insulator and bearing.
*Please note - Vespel® ASB grades consist of a metallic component and a Vespel® CP component.			

¹² Standard specification for finished parts made from polyimide resins. Available at: <https://www.astm.org/d6456-10r18.html> (Accessed in June 2023).

Data based on DuPont Vespel® S Line Design Handbook. Available at:

<https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%C2%AE%20S%20Line%20Design%20Handbook.pdf> (Accessed in July 2023).

Source: RPA, 2023¹³

- The analysis of alternatives concludes that there are currently no technically suitable nor economically feasible alternatives readily available to substitute fluoropolymers such as PTFE and PFA while providing comparable product performance benefits.
 - For Vespel® parts and shapes, projects have been initiated to develop alternatives to PFAS in products such as replacing the PTFE micropowder that is used in direct-form parts. In all other Vespel® products that use PFAS, the fluoropolymer constitutes a large fraction of a part or purchased component, and therefore no alternatives exist. **For Vespel® parts and shapes, several alternatives were considered. These included bronze, Isostatic Vespel® shapes, as well as thermoplastics like PEEK and PAI.** However, both bronze and thermoplastics were deemed technically unfeasible for various reasons. Bronze, requires a lubrication system, had a higher coefficient of friction, necessitated redesigning other engine components, and added weight. Thermoplastics were unsuitable due to their inability to operate within the required temperature range. Isostatic Vespel® shapes, on the other hand, showed potential to fulfil some technical criteria in specific applications. However, they would not meet all requirements, particularly in high-temperature environments, where dimensional tolerance and coefficient of thermal expansion are critical to operation.
- **Without any derogation related to PFAS used in Vespel® parts and shapes in the applications, the primary impact of the potential EU PFAS restrictions would be no importation of these products into the EU for the key industries. The industries these products support would not be able to continue operations. In the case of a complete shutdown of operations in the EEA, the Mechelen manufacturing facility would close.** As a result, during this period, the supply of Vespel® direct formed products to the industries currently served by Mechelen would cease completely.
- As a result of the potential broad restriction for PFAS, the aerospace industry including commercial flights into and out of the EEA will cease due to the lack of ability to perform maintenance on aircraft, impacting travel and shipping, which will also impact industries that rely on air travel.
- Electric vehicles demand essential light weighting to maximize vehicle range. Using Vespel® bushings enables motor and drive systems that do not rely on heavy and resource intensive lubrication systems. A restriction on parts for electric vehicles could challenge the ability to achieve the Green Deal Initiatives.

¹³ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

- Vespel® CR products reduce environmental emissions in the chemical industry as well as the petroleum and mining industries. Where used, Vespel® parts and shapes increase the reliability and safety and lower the cost of ownership of industrial processes. Restricting the use of Vespel® products will reduce EEA competitiveness, and result in an increase in industrial accidents with corresponding loss of life and environmental pollution.
- **Overall, for DuPont, the total direct impact is in a high order of magnitude.** Nevertheless, for DuPont's downstream users and actors that are dependent on their PFAS-containing Kalrez® perfluoroelastomer parts and Vespel® parts and shapes, the socio-economic impacts are substantially higher. According to the Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain prepared by RPA¹⁴, the potential PFAS restriction is expected to create a ripple effect throughout the supply chain, particularly in industries reliant on aviation for the essential movement of people and transportation of goods. **This disruption, affecting not only aviation but also adjacent industries, is projected to surpass 582 billion EUR between June 2026 (the year of restriction introduction with no derogations + 18 months transition period) and 2030.**
- From an EEA macroeconomic standpoint, the broad restriction of critical fluoropolymers in the EEA will have deleterious impacts on the competitiveness of the EEA markets in the industrial operating environments, on competition in the EEA, on innovation, and on the overall EEA trade balance. A broad restriction of PFAS used in the production and manufacturing of Vespel® parts and shapes in the EEA would put the EU market at a disadvantage in competition with non-EEA markets, as EEA companies would no longer be able to provide the product to customers outside the EEA, while the rest of the world would have access to a wider portfolio of products and methods of manufacture. The 'wider economic impacts' section (4.3) provides a discussion on the wider macroeconomic impacts and consequences on EU society at large.

¹⁴ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

1.5. Derogations requested

The assessment presented in this document reasonably justifies the request for time-unlimited derogations for the use of specific fluoropolymers, including perfluoroelastomers, for critical industrial applications.

Based on the assessment presented below, DuPont requests the following:

- A time-unlimited derogation (exemption from the proposed restriction) for fluoropolymers including FFKM (such as Kalrez® perfluoroelastomer parts), FKM (such as Zalak® high performance seals), PTFE, and PFA in transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, energy, and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools),
- a 15-year derogation for fluorinated polymerization aids for PTFE micro-powder as a user of PTFE micropowders with a review at 6 years after EiF to evaluate the research progress and extend the derogation, if necessary,
- a 15-year derogation for fluorinated polymerization aids for PFA as a user of PFA with a review at 6 years after EiF to evaluate the research progress and extend the derogation if necessary, and
- a 15-year derogation for fluorinated polymerization aids for FFKM with a review at 6 years after EiF to evaluate the research progress. This progress can be used to assess the societal value versus the risk and the progress toward finding alternatives to assess the likelihood of a needed extension beyond 15 years.

If the exemption for the use of fluoropolymers, including perfluoroelastomers, is granted for industrial uses, then DuPont fully supports annual reporting requirements via a site-specific management plan to manufacturers of fluoropolymers and articles which use fluoropolymers in the EU, and importers of articles which use fluoropolymers to gather data on the use of PFAS in industrial sectors and to monitor any developments/changes. DuPont agrees that the site-specific plan should include:

- Information on the identity of the substances and the products they are used in;
- A justification for the use;
- Details on the conditions of use and safe disposal.

DuPont agrees that the management plan shall be reviewed annually and kept available for inspection by enforcement authorities upon request.

2. LINK BETWEEN THIS DOCUMENT AND THE PUBLIC CONSULTATION QUESTIONS

The following overview **connects this document to the public consultation questions**. It shows the responses in the official sections of the public consultation system within the space given, and it guides interested parties towards the sections of this document where further detail can be found that did not fit into the text limitations given by the system.

Section I and Section II – personal information and organisation:
Response – this information will be provided in the system.
Section III – Non-confidential comments
Response – EPPA performed an analysis for DuPont on specific PFAS related to fluoropolymer containing and/or based Vespel® parts and shapes and Kalrez® perfluoroelastomer parts in high performance operating environments for industrial use in the European Economic Area (EEA) market. The purpose is to provide regulators with strong evidence-based findings on the anticipated societal and economic impacts that are expected to occur should these substances be restricted under REACH. The analysis is submitted as a public attachment that contains a detailed description of the aims and scope of the analysis, perspectives on alternatives, as well as impacts, plus a conclusion and the derogations justified by the analysis in this document. This is the second of two submissions within this Public Consultation for DuPont Kalrez® perfluoroelastomer parts and Vespel® parts and shapes. It covers additional topics of interest such as socio-economic and environmental impacts data, of which the data has now been collected.
Specific information requests
Public consultation question 1 (Q1): Sectors and (sub-)uses: Please specify the sectors and (sub-)uses to which your comment applies according to the sectors and (sub-)uses identified in the Annex XV restriction report (Table 9). If your comment applies to several sectors and (sub-)uses, please make sure to specify all of them.
Response and link to further information in this document: Q1: While DuPont Vespel® parts and shapes and Kalrez® perfluoroelastomer parts are used in various high performance operating environments, the analysis and this submission focuses on the use of PFAS in the following industries: Vespel® parts and shapes in transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, energy, and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools), Kalrez® perfluoroelastomer parts in transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, and energy. Further details on these sectors and (sub-)uses will be found in the attached documents.
Public consultation question 2 (Q2): Emissions in the end-of-life phase: The environmental impact assessment does not cover emissions resulting from the end-of-life phase. To get a better understanding of the extent of the resulting underestimation, (sub-)use-specific information is requested on emissions across the different stages of the lifecycle of products, i.e., the manufacture phase, the use phase, and the end-of-life

phase. Please provide justifications for the representativeness of the provided information. In particular:

Please provide, at the (sub-)use level, an indication of the share of emissions (as percentages) attributable to these three different stages. An indication of annual emission volumes in the end-of-life phase at sector or sub-sector level would also be appreciated.

If possible, please provide for each (sub-)use what share of the waste (as percentages) is treated through incineration, landfilling and recycling. Please provide information to justify the estimates as well as information on the form of recycling referred to.

Response and link to further information in this document:

Q2: Vespel® parts and shapes

A conservative approach was applied to estimate the total emissions including waste at the DuPont Mechelen site. Mechelen produces Vespel® products. The PTFE emissions to water have been estimated to be max 0.37 kg/year while emissions to air are considered negligible. It is estimated that the combination of waste from Mechelen, machine shops, and used Vespel® parts from the aerospace, transportation, industrial, and electronic segments result in ca. 1472 kg/year of PTFE/PFA sent to incineration facilities. Additionally, it is estimated that ca. 932 kg/year of PTFE/PFA machine waste is sent to landfills via machining waste from transportation, industrial, and electronics machine shops.

Kalrez® perfluoroelastomer parts

For Kalrez® perfluoroelastomer parts, it can be reasonably assumed that the amount of used material disposed of each year is roughly equal to the amount sold in the EU. A small amount of material will be imported and re-exported and some uses will last well over one year, but the **majority of uses are replacements of existing seals during planned preventative maintenance**. The maintenance period is typically determined by the shortest lasting component and seals are replaced each time equipment is disassembled to prevent damage from handling the seal during maintenance. Kalrez® perfluoroelastomer seals are typically used for maximizing time between planned preventative maintenance in the critical applications the business supports.

Incineration is currently recommended by DuPont for its seals and is required in many EU countries due to high fluorine content and the exposure to hazardous chemicals during use (Directive 2008/98/EC & DIRECTIVE 2000/76/EC). Seal uses are industrial (as described before, mostly in semiconductor manufacturing and chemical industries) and it is expected that most users will incinerate. It cannot be excluded that some number of used materials may end up in landfills (recycling is currently not possible), with the majority being incinerated.

Although data on FFKM incineration effectiveness is lacking, its composition suggests potentially better outcomes than PTFE due to additional chemical weaknesses. According to a literature review, it is expected that an incinerator verified for fluoropolymer incineration would be suitable for Vespel® products (Bakker, J. et al., 2021; Aleksandrov, K., et al., 2019). Data for emissions in landfills is not available. DuPont is participating in an FPG study to better determine likely emissions in landfills.

It should be noted that **Kalrez® seals undergo extensive heat treatment in excess of 200°C during manufacturing prior to sale**. This minimizes residual non-polymeric PFAS (such as residual polymerization aids).

The public attachment to this submission titled “PUBLIC_DuPont_PFAS_Public-Consultation-Document_v2_2023-09-15” provides further evidence on the underlying steps behind the estimations of the emissions in sections 5.2 and 5.3.

Public consultation question 3 (Q3):

Emissions in the end-of-life phase: With respect to waste management options, additional information is requested on the effectiveness of incineration under normal operational conditions (for different waste types, e.g., hazardous, municipal) with respect to the destruction of PFAS and the prevention of PFAS emissions.

Response and link to further information in this document:

Q3: According to a literature review, it is expected that an incinerator verified for fluoropolymer incineration would be suitable for Vespel® products (Bakker, J. et al., 2021; Aleksandrov, K., et al., 2019). For FFKM, the effectiveness of incineration is not known. DuPont is participating in an incineration study with the American Chemistry Council (ACC) to have additional information on the effectiveness of incineration (ECHA18, 4444).

Public consultation question 4 (Q4):

Impacts on the recycling industry: To get an understanding of the impacts of the proposed restriction on the recycling industry, information is requested on:

The impacts that the concentration limits proposed in paragraph 2 of the proposed restriction entry text (see table starting on page 4 of the summary of the Annex XV restriction report) have on the technical and economic feasibility of recycling processes (together with a clear indication on the waste streams to which the described impacts relate).

The measures that recyclers would need to take to achieve the proposed concentration limits.

The costs associated with these measures.

Response and link to further information in this document:

Q4: Kalrez® perfluoroelastomer parts and Vespel® parts and shapes have long lifetimes and because they are used in industrial applications. Industrial companies are required to segregate and dispose of wastes according to EU plus local regulations. Due to potential cross contamination with the materials our products come into contact with, they are not recycled and therefore do not impact standard municipal recycling programs.

Public consultation question 5 (Q5):

Proposed derogations – Tonnage and emissions: 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 proposed derogations. For these proposed derogations, information is requested on the tonnage of PFAS used per year and the resulting emissions to the environment for the relevant use. Please provide justifications for the representativeness of the provided information.

Response and link to further information in this document:

Q5: A conservative approach was applied to estimate the total emissions including waste at the Mechelen site. Mechelen produces Vespel® products. The emissions to water have been estimated to be ca. 0.37 kg/year while emissions to air are considered negligible. It is estimated that the combination of waste from Mechelen, machine shops, and used Vespel® parts from the aerospace, transportation, Industrial, and electronic segments result in ca. 1472 kg/year of PTFE/PFA sent to incineration facilities. Additionally, it is estimated that ca. 932 kg/year of PTFE/PFA machine waste

is sent to landfills via machining waste from transportation, industrial, and electronics machine shops at end of life.

The environmental emissions analysis for Kalrez® perfluoroelastomer parts reveals that expected PFAS emissions from EEA usage (based on annual imports to EEA) are estimated to be less than 0.375 kg per year. DuPont's involvement in an FPG landfill study aims to provide more insights into emissions.

Kalrez® seal manufacturing involves high-temperature treatment, reducing residual non-polymeric PFAS. DuPont is participating in an incineration study with the American Chemistry Council (ACC) to have additional information on the effectiveness of incineration (ECHA18, 4444).

The public attachment to this submission titled "*PUBLIC_DuPont_PFAS_Public-Consultation-Document_v2_2023-09-15*" provides further evidence on the underlying steps behind the estimations of the emissions in sections 5.2 and 5.3.

Public consultation question 6 (Q6):

Missing uses – Analysis of alternatives and socio-economic analysis: Several PFAS uses have not been covered in detail in the Annex XV restriction report (see uses highlighted in blue and orange in Table A.1 of Annex A of the Annex XV restriction report). In addition, some relevant uses may not have been identified yet. For such uses, specific information is requested on alternatives and socio-economic impacts, covering the following elements:

The annual tonnage and emissions (at sub-sector level) and type of PFAS associated with the relevant use.

The key functionalities provided by PFAS for the relevant use.

The number of companies in the sector estimated to be affected by the restriction.

The availability, technical and economic feasibility, hazards and risks of alternatives for the relevant use, including information on the extent (in terms of market shares) to which alternative-based products are already offered on the EU market and whether any shortages in the supply of relevant alternatives are expected.

For cases in which alternatives are not yet available, information on the status of R&D processes for finding suitable alternatives, including the extent of R&D initiatives in terms of time and/or financial investments, the likelihood of successful completion, the time expected to be required for substitution (including any relevant certification or regulatory approvals) and the major challenges encountered with alternatives which were considered but subsequently disregarded.

For cases in which substitution is technically and economically feasible but more time is required to substitute:

the type and magnitude of costs (at company level and, if available, at sector level) associated with substitution (e.g., costs for new equipment or changes in operating costs);

the time required for completing the substitution process (including any relevant certification or regulatory approvals);

information on possible differences in functionality and the consequences for downstream users and consumers (e.g., estimations of expected early replacement needs or expected additional energy consumption);

information on the benefits for alternative providers.

For cases in which substitution is not technically or economically feasible, information on what the socio-economic impacts would be for companies, consumers, and other affected actors. If available, please provide the annual value of EU sales and profits of the relevant sector, and employment numbers for the sector.

Response and link to further information in this document:

Q6: Several key industrial applications have not been covered in the draft proposal. Examples include: Both Kalrez® and Vespel® products are used in the energy industry (incl. gas and hydrogen) and used in the petroleum and mining industry.

In the “Petroleum and Mining” use, the sub-uses of “gas” and “hydrogen” are not clearly called out and should be added. To support adding these (sub-)uses to Petroleum and Mining, relevant information is provided in the attached analysis document under the “Petroleum and Mining” use. While “Petroleum and Mining” covers a significant portion of the chemical processing industry, many other chemical processing industries (including semiconductor fabrications systems) rely on FFKM to reduce and prevent environmental emissions.

Uses within the transportation industry outside of HVAC refrigerants, including critical aerospace engine components and safety systems are not included in the draft proposal.

Military and defence and chemical processing applications were missed in the draft proposal.

The aerospace industry is included in general transportation and the qualification time as well as technical feasibility of substitution differs from general transportation. DuPont performed a Socio-Economic Impact Assessment (SEA) for the use of PFAS within the Aerospace Supply Chain and will submit the SEA in another submission.

Vespel® parts and shapes are used in a broad set of general industrial applications (like e.g., industrial manufacturing in industries such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools), and these should be considered as well.

The attachment to this submission will provide further evidence.

Public consultation question 7 (Q7):

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 information is requested on alternatives and socio-economic impacts covering the elements described in points a) to g) in question 6 above.

Response and link to further information in this document:

Q7:

General comments:

Kalrez® perfluoroelastomer parts and Vespel® parts and shapes containing PFAS are widely used in high performance industrial operating environments such as transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, energy, and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools), where components need to withstand the harsh operating environments and material performance is critical. These industries and uses would be heavily impacted and even disrupted in case of a restriction of the use. Industrial operating environments heavily rely on the use of FFKM (such as Kalrez® perfluoroelastomer parts) and Vespel® parts and shapes, which contain or depend on fluoropolymers such as PTFE and PFA. These materials are essential for high-demand applications due to their unique combination of properties.

The proposed restriction on PFAS substances would prohibit manufacturing of Vespel® parts and shapes in the EU and the import of PFAS-containing Vespel® parts and shapes and Kalrez® perfluoroelastomer parts in the EEA. The analysis of alternatives concludes that there are currently no technically suitable alternatives available to substitute fluoropolymers such as PTFE, PFA, FKM, and FFKM while providing comparable product performance. Thus, drastic impacts are expected. These include an increased risk of emissions of chemicals to the environment as well as increased worker exposure risk. For example, a heavy negative impact on the semiconductor manufacturing industry in the EU that the EU is trying to re-build further. Furthermore, drastic impacts on many industrial manufacturing process that can no longer be performed. The aerospace industry would have to cease assembly, manufacture, or repair of all commercial aircraft in the EU. There would also be a restriction on parts used in electric vehicles and renewable hydrogen applications. Vespel® parts and shapes and Kalrez® perfluoroelastomer parts support the military and defence industry as well.

Kalrez® perfluoroelastomer parts (FFKM):

For the past 50 years, there have been no new inventions or successful developments to replace FFKM.

Another aspect is the use of fluorinated polymerization aids for FFKM. If a suitable alternative for the polymerization aid can even be found, the research and development (R&D) process for finding non-PFAS alternatives to this polymerization aid for Kalrez® perfluoroelastomer parts is expected to take at least 15 years.

It should be noted that FFKM is only used where absolutely necessary and where the conditions do not allow any other material. This is because perfluoroelastomers are substantially (factor >10 vs closest elastomer) more expensive than alternative materials; therefore, it is only purchased for applications where no other elastomeric material can withstand the chemical and temperature environment. Substitution of FFKM therefore naturally takes place due to economic considerations alone where technically possible. This point has specifically been acknowledged by the dossier submitters.

Vespel® parts and shapes containing PFAS:

Fluoropolymers, such as PTFE, are critical ingredients when blended with other engineering plastics, and in the case of Vespel® parts and shapes act as an internal lubricant and/or physical property modifier for engineered components in transportation and other related uses. Alternatives have been explored but have not provided the performance characteristics required for the critical applications. The main obstacle encountered with many alternative materials is their inability to match the desired combination of chemical resistance, thermal stability, compliance, electrical resistance (including galvanic corrosion resistance), low friction, and/or tribological properties required for specific applications, resulting in premature failure. In the case of non-PFAS alternatives (non-fluoropolymers), their performance falls significantly behind the incumbent fluoropolymer. They are unable to meet the critical requirements of applications that demand both high temperature and high chemical resistance.

Projects have been initiated to develop alternatives to PFAS in products such as replacing the polymeric processing aid that is used for direct-form parts (one group of products in the portfolio). In all other Vespel® products that use PFAS, the fluoropolymer constitutes a large fraction of a part or purchased component, and therefore no alternatives exist.

The overall development timeline for substitution efforts – if alternatives can be found - spans several years, typically requiring 5 years for research and development for the exploratory phase of alternate material identification. Then, a qualification for all materials impacted occurs (additional 3 years) before customer qualification. After that, qualification with customers will vary with customer and application. Given the high cost of the materials in this marketplace, it is a market reality that it would have been replaced with cheaper materials that would match the requirements should such products already exist.

General conclusion and derogation request:

The timeframe for replacement is also dependent upon the degree on which the final product relies on the properties of PFAS. While it may be possible to develop replacements for polymeric processing aids within the 15-year R&D timeframe, certain products that derive their function from the unique properties of fluoropolymer PFAS as a major component will never be completely replaced. Very significant impacts have been identified as part of the analysis due to the majority of products relying on the function of fluoropolymers for applications.

Based on the assessment, DuPont requests the following:

- **A time-unlimited derogation (exemption from the proposed restriction) for fluoropolymers including FFKM (such as Kalrez® perfluoroelastomer parts), FKM, PTFE, and PFA in transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, energy, and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools),**
- a 15-year derogation for fluorinated polymerization aids for PTFE micro-powder as a user of PTFE micro-powders with a review at 6 years after EiF to evaluate the research progress and extend the derogation, if necessary,

- a 15-year derogation for fluorinated polymerization aids for PFA as a user of PFA with a review at 6 years after EiF to evaluate the research progress and extend the derogation if necessary, and
- a 15-year derogation for fluorinated polymerization aids for FFKM with a review at 6 years after EiF to evaluate the research progress. This progress can be used to assess the societal value versus the risk and the progress toward finding alternatives to assess the likelihood of a needed extension beyond 15 years.

The attachment to this submission will provide further evidence.

Public consultation question 8 (Q8):

Other identified uses – Analysis of alternatives and socio-economic analysis: Table 8 in the Annex XV restriction report provides a summary of the identified sectors and (sub-)uses of PFAS, their alternatives and the costs expected from a ban of PFAS. More details on the available evidence are provided in the respective sections in Annex E.

For many of the (sub-)uses, the information on alternatives and socio-economic impacts was generic and mainly qualitative. In particular, evidence on alternatives was inconclusive for some applications falling under the following (sub-)uses: technical textiles, electronics, the energy sector, PTFE thread sealing tape, non-polymeric PFAS processing aids for production of acrylic foam tape, window film manufacturing, and lubricants not used under harsh conditions.

More information is needed on alternatives and socio-economic impacts to conclude on substitution potential, proportionality, and the need for specific time-limited derogations. Therefore, specific information (if not already included in the Annex XV restriction report or covered in the questions above) is requested on alternatives and socio-economic impacts covering the elements listed in points a) to g) in question 6 above.

Response and link to further information in this document:

Q8: As the uses of the Kalrez® and Vespel® products span a wide variety of sectors and applications, the comment made in Q7 is relevant and applicable in this section in the same way.

Public consultation question 9 (Q9):

Degradation potential of specific PFAS sub-groups: A few specific PFAS sub-groups are excluded from the scope of the restriction proposal because of a combination of key structural elements for which it can be expected that they will ultimately mineralize in the environment. RAC would appreciate to receive any further information that may be available regarding the potential degradation pathways, kinetics or produced metabolites in relevant environmental conditions and compartments for trifluoromethoxy, trifluoromethylamino- and difluoromethanedioxy-derivatives.

Response and link to further information in this document:

Q9: These sub-groups are outside of the scope of this response and this document, therefore no information related to Q9 will be provided here.

Public consultation question 10 (Q10):

Analytical methods: Annex E of the Annex XV restriction report contains an assessment of the availability of analytical methods for PFAS. Analytical methods are rapidly evolving. Please provide any new or additional information on new developments in analytics not yet considered in the Annex XV restriction report.

Response and link to further information in this document:

Q10: Per Annex E, DuPont followed the analytical methods suggested. Total fluorine analysis was completed using combustion ion chromatography (CIC), and results were validated with matrix matched standards. The method was adequate to detect the total Fluorine content (not the amount of PFAS chemical).

Section IV and Section V – non-confidential and confidential attachments:

Response – these attachments will be provided in the system by attaching the non-confidential version of this document here.

3. AIMS AND SCOPE OF ANALYSIS

3.1. Purpose, scope, and methodology of this analysis under REACH

On 13 January 2023, the Competent Authorities (CAs) of the Netherlands, Germany, Sweden, Denmark, and Norway submitted a joint REACH restriction proposal for PFAS. In the proposed restriction, PFAS (Per- and Polyfluoroalkyl Substances) are defined as any substance containing at least one fully fluorinated methyl (CF_3 -) or methylene ($-\text{CF}_2$ -) carbon atom (without any hydrogen, chlorine, bromine, or iodine attached to it). The definition is based on OECD definition of PFAS published in 2021 and covers over 10,000 PFAS. The entry into force of a potential restriction is anticipated to take place in 2025 and become effective in 2026/2027).^{15, 16, 17}

Fluoropolymers and fluorinated elastomers possess a combination of inherent physical properties that make them crucial in various industrial applications. They are highly valued for their ability to meet performance requirements related to safety, environmental performance, and efficiency of operations, especially in harsh conditions. These criteria include withstanding wide temperature fluctuations, broadest chemical resistance among polymers, reducing friction to minimize wear in moving parts, supporting lightweight design for enhanced fuel efficiency and increased loads, ensuring the proper functioning of safety equipment, as well as providing resistance to several types of radiation and preventing hazardous situations caused by fluid leaks.

Methodology

This analysis aims to identify and to assess in both qualitative and (when feasible) quantitative terms the socio-economic impacts that are expected to occur in case of a REACH restriction to this group of substances. **A detailed data gap analysis has been conducted** to gather information and data on PFAS in DuPont's Vespel® and Kalrez® product portfolio in the EEA that will be affected by a potential REACH restriction.

The assessment has been conducted in accordance with the existing official guidance from ECHA under REACH. ECHA has developed a solid methodology for conducting socio-economic assessments in the context of the REACH Regulation, with the support of a dedicated committee (SEAC). More specifically, this methodology is consistently applied for REACH applications for authorization of Substances of Very High Concern (SVHC), and REACH restrictions with a view of forecasting through the SEAC the impacts of the different regulatory options.

¹⁵ Banks, R.E., Smart, B.E., Tatlow, J.C., 1994. Organofluorine chemistry: Principles and commercial applications. New York (NY): Plenum. 670 p. ISBN 978-1-4899-1202-2.

¹⁶ Kissa, E., 2001. Fluorinated Surfactants and Repellents, 2nd Edition, CRC Press. ISBN 9780824704728.

¹⁷ Buck, R.C., Franklin, J., Berger, U., Conder, J.M., Cousins, I.T., de Voogt, P., Jensen, A.A., Kannan, K., Mabury, S.A., van Leeuwen, S.P., 2011. Perfluoroalkyl and polyfluoroalkyl substances in the environment: Terminology, classification, and origins. *Integr. Environ. Assess. Manag.* 7, 513–541.

From a geographical perspective, this analysis focuses on the European Economic Area (EEA) territory, comprising the European Union (EU-27), Iceland, Liechtenstein, and Norway. For assessing the producers' surplus (one part of the economic impacts), it has been decided to use a **4-year time horizon**, which is the time period suggested by SEAC when there is no suitable alternative available in general (SAGA).^{18, 19}

3.2. DuPont Vespel® parts and shapes and Kalrez® perfluoroelastomer parts

DuPont's history of innovation in materials science has enabled the company to assist customers in developing solutions that effectively address the most pressing challenges in their respective industries. Vespel® parts and shapes were first introduced in the 1960s and Kalrez® perfluoroelastomer parts (FFKM) in 1972. DuPont's supports its customers for these products by a wide range of comprehensive testing capabilities.²⁰ **These testing capabilities play a crucial role in enabling customers to meet the rigorous industry standards pertaining to reliability, safety, traceability, and efficiency.** This is particularly significant in critical applications that involve operating in demanding high-temperature environments combined with harsh chemicals and/or high pressure, such as those prevalent in the oil and gas, transportation, aerospace, chemical as well as industrial processing, and semiconductor manufacturing industry.²¹

Vespel® parts and shapes

Vespel® parts and shapes are a family of high-performance materials manufactured by DuPont that have a proven track record of outperforming other engineering materials since 1965. They perform in extreme conditions, such as temperature extremes, high friction, and heavy loads. **Vespel® parts and shapes products find widespread use in demanding industrial operating environments such as the aerospace, transportation including on-road automotive as well as commercial/off-road vehicles such as farming, construction, mining, and military vehicles, semiconductor manufacturing and testing, the petroleum and mining industry, industrial manufacturing including industries such as automotive manufacturing, chemical processing, textile, glass handling and industrial welding/plasma/cutting tools.**

The product portfolio of Vespel® parts and shapes, is a large offering of parts that withstand extreme operating environments. The Vespel® parts and shapes portfolio offer a diverse range of properties.

¹⁸ https://echa.europa.eu/documents/10162/13637/ec_note_suitable_alternative_in_general.pdf/5d0f551b-92b5-3157-8fdf-f2507cf071c1

¹⁹ https://echa.europa.eu/documents/10162/0/afa_seac_surplus-loss_seac-52_en.pdf/5e24c796-d6fa-d8cc-882c-df887c6cf6be?t=1633422139138

²⁰ DuPont, 2022. DuPont™ Kalrez® perfluoroelastomer parts and Vespel® parts and shapes. Polymeric solutions for exceptional valve sealing performance in extreme environments. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%20Kalrez%20and%20Vespel%20Parts%20-%20Polymeric%20solutions%20for%20valve%20sealing%20-%20KZE-A40130-00-A1122.FinalRev.pdf> (Accessed in July 2023).

²¹ DuPont, 2022. DuPont™ Kalrez® and Vespel® Parts. Polymeric solutions for exceptional valve sealing performance in extreme environments. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%20Kalrez%20and%20Vespel%20Parts%20-%20Polymeric%20solutions%20for%20valve%20sealing%20-%20KZE-A40130-00-A1122.FinalRev.pdf> (Accessed in June 2023).

Over the past 50 years, this portfolio has expanded to include various grades, each with its own unique characteristics achieved through different types and levels of fillers and manufacturing methods.

DuPont's Vespel® parts and shapes provide a combination of the physical properties common among engineered plastics, metals, and ceramics. These properties include proven performance when used continuously in air up to 300 °C and for short excursions to as high as 550 °C, low wear and friction at high pressures and velocities (lubricated or unlubricated), creep resistance, strength and impact resistance, chemical resistance, and machinability.²² **These properties make Vespel® parts and shapes crucial for use in high performance operating industrial applications, which require high stability along with durable, long-lasting properties.** Table 1 in Annex I provides a non-exhaustive list of examples of Vespel® grades and their corresponding properties.

Figure 1: DuPont Vespel® parts and shapes.



Source: DuPont, 2023

(<https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20for%20Automotive%20Applications%20-%20VPE-A40093-00-A0323.FinalRev.pdf>)

Vespel® products are available and offered either as a shape, a near net shape, and/or as a finished part, as illustrated in Figure 1. Custom polyimide direct formed parts (DF/DF2) are engineering solutions manufactured by DuPont for high-volume solutions. In general, polyimide direct form parts use PTFE micropowder in the manufacturing process. These parts require minimal machining steps, resulting in lower costs per part than the shapes offering, and less material scrap or waste. Composite and assembly parts are designed to be used as produced. These products can include one or more of the following PFAS uses: PTFE reinforced fabrics, Fluorine containing polyimides, and/or a PTFE mould

²² DuPont, 2022. DuPont™ Vespel® SP-1 for ball valve seats. Electronics & Industrial Kalrez® - Vespel® EMEA. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20SP-1%20for%20ball%20valve%20seats%20-%20VPE-A40079-00-0922%20-%20EXTERNAL%20VERSION.pdf> (Accessed in June 2023).

release. Chemical- and creep-resistant (CR) shapes, which use PFA, can be machined to final specification downstream.

Kalrez® perfluoroelastomer parts

Kalrez® perfluoroelastomer parts are manufactured by DuPont outside the EEA for sealing applications, particularly in O-ring shapes. The base polymer is composed of a copolymer product of tetrafluoroethylene, a perfluorinated ether, and a cure site monomer. FFKM is known for its ability to provide highly resistant seals and cleanliness in extreme temperature and chemical environments.

Kalrez® perfluoroelastomer parts are specifically designed to provide sealing solutions in demanding applications such as transportation (including aerospace), petroleum and mining, chemical processing (including pharmaceutical industry), semiconductor manufacturing, military and defence, energy.²³ These products offer enhanced stability, resistance, and reliable sealing capabilities. **They resist more than 1,800 different chemicals while offering high temperature stability.** The Kalrez® product portfolio encompasses a wide range of properties, with a non-exhaustive list of products and their properties provided in Table 2 in Annex I.²⁴

Kalrez® perfluoroelastomer parts are used as sealing elements in the form of o-ring or custom seal geometries in various mechanical parts, shaft bearings, bushings, T-Seals, boots, chevron stacks, KVSP V-rings, packing systems, valves, pumps, wireline and drilling tools, mechanical seals in rotating equipment (e.g., pumps, mixers), compressors, filters, couplings, spraying heads, cleaning installations, dosing systems, sampling systems, filling equipment, centrifuges, instrumentation (e.g., level gauges, flowmeters, gas analysers, laboratory equipment), fuel burners, ozonators, bonded door, poppet valves, plasma chambers, isolation valves, wafer handling, viewports, gas line feeds, gas injection, and electrostatic chucks.^{25,26} **The versatility of Kalrez® perfluoroelastomer parts allows for customized geometries to meet specific sealing requirements.** This results in a diverse range of seal types such as T-seals, packers, S-seals, V-rings, Chevron stacks, boots, X-rings, tri-lobes, electrostatic chucks, protective seals, bonded doors, and metal bondings. Figure 2 illustrates Kalrez® perfluoroelastomer parts.

²³ DuPont, 2023. Kalrez®. Available at: <https://www.dupont.com/kalrez.html> (Accessed in June 2023).

²⁴ DuPont, 2022. DuPont™ Kalrez® and Vespel® Parts. Polymeric solutions for exceptional valve sealing performance in extreme environments. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%E2%84%A2%20Kalre%C2%AE%20and%20Vespel%C2%AE%20-%20Polymeric%20Solutions%20for%20Valve%20Sealing%20in%20Extreme%20Environments.pdf> (Accessed in June 2023).

²⁵ DuPont, 2023. DuPont™ Kalrez® Perfluoroelastomer Parts in energy and oil & gas – Product selector guide. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%20Kalrez%20Oil%20and%20Gas%20Product%20Selector%20Guide%20-%20KZE-A40128-00-B0123.FINALREV.pdf>
[https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont Kalrez Oil and Gas Product Selector Guide - KZE-A40128-00-B0123.FINALREV.pdf](https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%20Kalrez%20Oil%20and%20Gas%20Product%20Selector%20Guide%20-%20KZE-A40128-00-B0123.FINALREV.pdf) (Accessed in June 2023).

²⁶ DuPont, 2023. Kalrez® Perfluoroelastomers for Oil & Gas. Available at: <https://www.dupont.com/kalrez/oil-and-gas.html> (Accessed in June 2023).

Figure 2: Kalrez® perfluoroelastomer parts.



Source: DuPont, 2023

The suitability of each seal type varies depending on the specific grade used. An overview of the suitability per application can be found in Table 3 in Annex I.

3.3. Use of Vespel® parts and shapes and Kalrez® perfluoroelastomer parts in high performance industrial operating environments

Kalrez® perfluoroelastomer parts and Vespel® parts and shapes are widely used in a broad variety of high-performance operating environments for industrial applications. More specifically, both products are used in transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, energy, and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools). Vespel® parts and shapes are also used in industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools). This section will provide an overview of the specificities of each industry and their use of DuPont's products.

3.3.1. Petroleum and mining industry and its use of Vespel® parts and shapes and Kalrez® perfluoroelastomer parts

Petroleum and mining are essential industries that play a vital role in shaping and driving the EU society by providing energy resources that are critical for economic advancements, transportation, and the overall functioning of modern society today and for a significant number of years still to come.²⁷ Universal access to affordable, sustainable, and dependable energy resources stands as the

²⁷ OECD, 2011. The Economic Significance of Natural Resources: Key Points for Reformers in Eastern Europe, Caucasus, and Central Asia. Available at: https://www.oecd.org/env/outreach/2011_AB_Economic%20significance%20of%20NR%20in%20EECCA_ENG.pdf (Accessed in June 2023)

seventh Sustainable Development Goal outlined by the United Nations, highlighting the significance of this aspect for societal well-being.²⁸ **The energy sector in the EU directly employs about 1.6 million people in extraction, production and distribution of energy and generates an added value of EUR 250 billion to the economy.** Europe has seen substantial investment in renewable energies. With around 513 million consumers, the EU energy sector is one of the largest common energy sectors in the world.²⁹

DuPont™ Kalrez® Valve Stem Packing (KVSP™), is a combination of chemically-resistant DuPont™ Kalrez® perfluoroelastomer parts and DuPont™ Vespel® V-rings that can reduce stem-based fugitive emissions and improve process control throughout the lifespan of the valve. Fugitive emissions remain a concern for many industries due to their potential to create environmental harm and incur economic costs. KVSP™ has the ability to significantly reduce stem-based fugitive emissions of methane and can also be used for handling other gasses including hydrogen. KVSP™ systems provide performance that approaches zero leakage. This is verified using EPA Method 21 for the determination of leakage of hydrocarbon-based volatile organic compounds (VOCs). KVSP™ requires smaller valve actuators than those required for graphite packing because it requires less compressive force and has much lower valve stem friction, leading to significant cost savings. DuPont™ Kalrez® KVSP™ is used both in the chemical and petroleum industries.³⁰

Figure 3: DuPont™ Kalrez® Valve Stem Packing (KVSP™).



Source: DuPont, 2022

(<https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%E2%84%A2%20KVSP%E2%84%A2%20-%20Reducing%20Fugitive%20Emissions.pdf>)

²⁸ United nations, 2023. Sustainable Development goals. Available at: <https://sdgs.un.org/goals/goal7> (Accessed in June 2023).

²⁹ International energy agency, 2022. Energy policy review. Available at: https://iea.blob.core.windows.net/assets/ec7cc7e5-f638-431b-ab6e-86f62aa5752b/European_Union_2020_Energy_Policy_Review.pdf (Accessed in August 2023).

³⁰ DuPont, 2022. DuPont™ Kalrez® Valve Stem Packing (KVSP™): Reducing Fugitive Emissions. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%E2%84%A2%20KVSP%E2%84%A2%20-%20Reducing%20Fugitive%20Emissions.pdf> (Accessed in June 2023).

Additional Vespe[®] applications:

Figure 4: Ball valve with Vespe[®] seats.

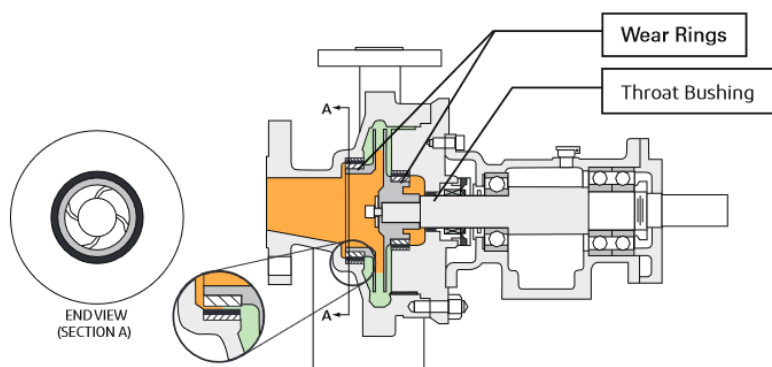


Source: DuPont, 2022

(<https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespe%20SP-1%20for%20ball%20valve%20seats%20-%20VPE-A40079-00-0922%20-%20EXTERNAL%20VERSION.pdf>)

Vespe[®] parts and shapes are used in the oil industry in valve seats for ball valves, which play a critical role in facilitating the smooth flow of high-pressure liquids and gases while minimizing any loss in pressure.³¹ The properties of Vespe[®] valve seats include resistance to wear, creep, deformation under sustained stress, and impact. Moreover, the valve enables ease of machining to precise tolerances, the ability to withstand high pressures of up to 3000 psi (20.7 MPa), and a broad operational temperature range. Figure 4 illustrates a ball valve with Vespe[®] seats, in which the black Vespe[®] seats facilitating the smooth flow of high-pressure liquids.

Figure 5: Vespe[®] product applications in pumps.



Source: DuPont, 2022

(<https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/Vespe%20CR-6100%20Wear%20Components%20for%20Fire%20Water%20Pumps%20in%20Offshore%20Oil%20Recovery%20Platforms%20-%20K22693.FinalRev.pdf>)

Wear rings are a critical part of a pump that reduces the leakage of fluid from high pressure zones to lower pressure zones. Since these wear rings are designed to reduce leakage within a pump, excessive wear on these parts can lead to leakage, increased emissions, and decreased efficiency of the pumps. Vespe[®] CR parts, such as wear rings and throat bushings, are used in the wear components of

³¹ DuPont, 2022. DuPont™ Vespe[®] SP-1 for ball valve seats. Electronics & Industrial Kalrez[®] - Vespe[®] EMEA. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespe%20SP-1%20for%20ball%20valve%20seats%20-%20VPE-A40079-00-0922%20-%20EXTERNAL%20VERSION.pdf> (Accessed in June 2023).

firewater pumps found on offshore oil recovery platforms, as illustrated in Figure 5.³² Vespe[®] CR-6100 parts, which contain 80 wt% PFA/20 wt% carbon fibre, reduce leakage by maintaining tight clearances over longer amounts of time due to their excellent wear and friction properties in extreme conditions. Depending on the industrial application, leaking in pumps and other industrial equipment can cause safety concerns for those operating the equipment and the surrounding environment, and it can also lead to increased fugitive emissions. Vespe[®] CR-6100 is a critical material for wear parts within industrial pump applications. In the context of offshore oil production facilities, ensuring safety and reliability at all times is of great importance, and the firewater pumps play a vital role in the safety systems. These pumps need to be ready to promptly start and operate at maximum capacity when the alarm is triggered, even after long periods of inactivity. Lengthy periods of inactivity or standby can cause corrosion in metallic wear components due to exposure to seawater. The pumps must operate continuously under highly demanding conditions while supplying pressurized seawater to the fire sprinkler and hose systems on the platform. **Vespe[®] CR bowl wear rings and column bushings exhibit resilience to run-dry operations, ultimately enhancing reliability and reducing maintenance expenditures.** Pumps handling harsh chemicals are equipped with a mechanical seal, a device that ensures the sealing between the rotating shaft and the body of the pump, Vespe[®] parts are a key component in this sub-assembly to ensure no leakage and reliable operation of the mechanical seal. Vespe[®] CR can help reduce pump seizures and can lower vibration. This increases longevity of pumps and can avoid breakdown of critical operating equipment for a wide range of industrial applications. It also helps avoid metal to metal contact within pumps that can be a great source of wear.

The Vespe[®] CR line can be fabricated into a large number of parts such as throttle bushings, vertical pump shaft bearing, agitator bushings, API separator bearings, gear pump bearings, centrifugal compressor labyrinth seals, reciprocating compressor valve plates, and pump wear rings.

Vespe[®] parts and shapes are being used to meet the most stringent sealing requirements in hydrogen applications,^{33, 34} thanks to its unique blend of thermal, mechanical, and tribological properties. Both SCP and CR products in Vespe[®] parts and shapes are being deployed as hydrogen use grows. Given the current environmental challenges linked to greenhouse gas emissions, hydrogen has the potential to become an important source of clean energy. Hydrogen has the benefit of only generating water as a by-product when combusted for energy and can be used in applications such as power generation, and as a substitute for fossil fuels for heating. Safety in sealing is key for storage, transportation and usage.

³² DuPont, 2022. DuPont™ Vespe[®] Pump Reliability Technology. Vespe[®] CR-6100 wear components for fire pumps in offshore oil recovery platforms. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/Vespel%20CR-6100%20Wear%20Components%20for%20Fire%20Water%20Pumps%20in%20Offshore%20Oil%20Recovery%20Platforms%20-%20K22693.FinalRev.pdf> (Accessed in June 2023).

³³ DuPont, 2023, Hydrogen Valves. Available at: [https://www.dupont.com/vespel/hydrogen-valves.html#:~:text=DuPont%E2%84%A2%20Vespel%C2%AE%20hydrogen,103%20MPa%20\(15%20C000%20psi\).&text=Vespe%20parts%20are%20suitable%20for,C%20\(%20D423%20C%20B0F\)](https://www.dupont.com/vespel/hydrogen-valves.html#:~:text=DuPont%E2%84%A2%20Vespel%C2%AE%20hydrogen,103%20MPa%20(15%20C000%20psi).&text=Vespe%20parts%20are%20suitable%20for,C%20(%20D423%20C%20B0F)) (Accessed in June 2023).

³⁴ See references to Vespe[®] in hydrogen service in EP1493962 B1, and DE602004001720 D1.

Additional Kalrez® perfluoroelastomer parts applications:

Rapid Gas Decompression (RGD) resistance is a critical property required in various components used in the oil and gas industry, such as seals, gaskets, O-rings, and other elastomeric articles. RGD occurs when gas is dissolved in an elastomer under high pressure, and subsequently, the pressure is suddenly relieved. When these materials are used in applications where they come into contact with pressurized gases, they can experience gas decompression effects, which can lead to dimensional changes, loss of mechanical properties, and potential failure. **Kalrez® perfluoroelastomer parts exhibit resistance to Rapid Gas Decompression (RGD)** and can withstand the most challenging environments, including Arctic surface conditions, as well as high downhole temperatures and pressures.³⁵ This makes Kalrez® perfluoroelastomer parts reliable both above and below ground. Oil refineries, which are often located in regions with cold climates, play a vital role in the transformation and refinement of crude oil into various products. **To meet the demanding temperature requirements in these environments, Kalrez® perfluoroelastomer parts have been formulated accordingly.**³⁶

According to the report by Wood Environment & Infrastructure Solutions UK Limited³⁷ which examined the use of PFAS in the petroleum and mining sector, including fluoropolymers, a wide range of fluoroplastics and fluoroelastomers are identified as being used in the oil and gas industry. The most common use for these materials in this sector is in the components of the equipment and piping used in extraction, transport and storage of petroleum resources.

Amine units are widely used in oil refineries and natural gas plants to eliminate sour gases such as hydrogen sulfide (H₂S) from product streams, a process known as sweetening.³⁸ However, the concentrations of alkylamines present in the aqueous solutions used for this purpose can cause elastomers to undergo swelling and lose their desired mechanical properties. This can result in the extrusion of the seal beyond its intended position, deformation of the fluid film in mechanical seals, increased leakage, and heightened operating torque in valves. **One of the specific Kalrez® grades, Kalrez® Spectrum™ 6380, offers resistance to amines and strong oxidizers, resulting in reduced leakage and extended mean time between repairs.**

³⁵ DuPont, 2023. DuPont™ Kalrez® Rapid Gas Decompression Testing. Available at: <https://www.dupont.com/knowledge/kalrez-rapid-gas-decompression-testing.html> (Accessed in June 2023).

³⁶ DuPont, 2022. DuPont™ Kalrez® OG193 Perfluoroelastomer Parts. Available at: https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/KZE-A40087-00-B0921_DuPont-Kalrez-OG193-Brochure-Letter_digital.pdf (Accessed in June 2023).

³⁷ Wood Environment & Infrastructure Solutions UK Limited, 2021. PFAS in mining and petroleum industry – use, emissions and alternatives. Available at: <https://www.miljodirektoratet.no/sharepoint/downloaditem/?id=01FM3LD2R3K5XU7HZ275GJ7NKF3DGGZ576> (Accessed in July 2023).

³⁸ DuPont, 2022. DuPont™ Kalrez® Spectrum™ 6380 Perfluoroelastomer parts for amine units in oil refineries/gas plants. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%E2%84%A2%20Kalrez%C2%AE%206380%20Perfluoroelastomer%20Parts%20for%20Amine%20Units%20in%20Oil%20RefineriesGas%20Plants.pdf> (Accessed in June 2023).

To achieve the 2050 Net Zero Emissions target, it is crucial to reduce methane emissions from fossil fuel operations by 74% by 2030. DuPont offers a valve stem packing,³⁹ which can minimize stem-related fugitive emissions of methane. This Kalrez® valve stem packing not only contributes by reducing methane leakage but also demonstrates its suitability for handling other gases, including hydrogen. **By relying on this Kalrez® perfluoroelastomer part, the oil and gas industry can make significant progress in addressing methane emissions and contributing to a more sustainable energy future.**

The oil and gas industry, particularly pipeline systems, face risks such as environmental disasters, fluid loss, and contamination. **Considering the severe consequences of a pipeline system failure, industries often rely on DuPont's Kalrez® perfluoroelastomer parts and Vespel® parts and shapes product portfolios to mitigate these risks.**

Hydrogen is anticipated to play a significant role in the heating and transportation sector.⁴⁰ However, the widespread adoption of hydrogen as an alternative energy source poses challenge. Hydrogen is typically stored and transported either in its cryogenic liquid form at extremely low temperatures or as a compressed gas under high pressures. **In this context, Vespel® parts and shapes propose low hydrogen permeability and robust physical properties that render them well-suited for hydrogen sealing applications.**

3.3.2. Semiconductor manufacturing industry and its use of Kalrez® perfluoroelastomer parts and Vespel® parts and shapes

With the ongoing digital transformation in the modern society, new sectors for the chip industry are emerging. These semiconductors generally constitute the backbone of innovative digital revolutions, such as autonomous vehicles, artificial intelligence, 5/6G communications, the internet of things, highly automated cars, space, connectivity, and defence applications.⁴¹ Yet, existing sectors are also increasingly relying on semiconductors, in a world where digitalisation has become a priority. Chips, for instance, power computers, smartphones, cars, servers in data centres, but also play a key role in ensuring security and constituting the basic technology for digital transformations.^{42,43} In 2022, high-tech products represented 17% of total extra-EU exports and 16% of total extra EU-imports.⁴⁴

³⁹ See Figure 3 for more detailed information.

⁴⁰ DuPont, 2022. DuPont™ Kalrez® and Vespel® Parts for Hydrogen Energy. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%E2%84%A2%20Vespel%C2%AE%20Parts%20for%20Hydrogen%20Energy.pdf> (Accessed in June 2023).

⁴¹ Ciani, A., Nardo, M., The position of the EU in the semiconductor value chain: evidence on trade, foreign acquisitions, and ownership, European Commission, Ispra, 2022, JRC129035. Available at: <https://joint-research-centre.ec.europa.eu/system/files/2022-04/JRC129035.pdf> (Accessed in August 2023).

⁴² Bown, C., 2020. How the United States marched the semiconductor industry into its trade war with China. PIIE Working Paper 20-16. Available at: <https://www.piie.com/sites/default/files/documents/wp20-16.pdf> (Accessed in August 2023).

⁴³ Bloom, N., et al., 2020. Are Ideas Getting Harder to Find? American Economic Review. 110(4), pp. 1104-1144. Available at: <https://web.stanford.edu/~chadj/IdeaPF.pdf> (Accessed in August 2023).

⁴⁴ Eurostat, 2022. International trade and production of high-tech products. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=International_trade_and_production_of_high-tech_products#:~:text=Highlights&text=In%202022%2C%20high%2Dtech%20products,of%20total%20extra%2DEU%20exp%20rts.&text=In%202022%2C%20China%20was%20the,States%20for%20high%2Dtech%20exports. (Accessed in August 2023).

The EEA semiconductor manufacturing industry has emphasized the importance of increasing investments that reduce supply chain dependence on manufacturing in other regions and the importance of increasing investments within the EU. This is echoed by the European Chips Act, which aims to enhance the EU's competitiveness and resilience in semiconductor technologies and application. The act is also designed to facilitate the digital and green transition. As recognised by the European Commission,⁴⁵ chips are strategic assets for crucial industrial value chains. Semiconductor chips are essential components of various digital products, ranging from computers, medical equipment, communications, energy, and industrial automation.

Currently, the EU owns approximately 10% of the global microchips market but is heavily dependent on suppliers outside the region. Industry expectations that the demand for chips will double by 2030, combined with the recent global semiconductor shortages which forced multi-sectoral factory closures, **reflect the growing importance of semiconductors for European industry and society**. The European Chips Act will address shortages and Europe's technological leadership and mobilise more than 43 billion EUR of public and private measures to prepare, forecast, and respond to future supply chain disruptions.^{46, 47}

Kalrez® perfluoroelastomer parts advance the semiconductor manufacturing processes in various segments. **Kalrez® perfluoroelastomer parts help DuPont's customers to reduce maintenance, reduce operating costs, and improve safety.**⁴⁸ Because of the purity of Kalrez® perfluoroelastomer parts, contamination is reduced, resulting in a higher wafer yield. Reducing contamination from particulates, outgassing, and extractables caused by seal deterioration are all critical goals for semiconductor fabricators.^{49,50}

In semiconductor applications, Kalrez® perfluoroelastomer parts are generally used in:

- **Plasma processing environments:** where high-endurance and robust seal materials like dry etching, lid seals, centre rings, and wafer support are required, particularly in the presence of oxygen and fluorine radicals^{51,52};

⁴⁵ European Commission, 2022. European Chips Act. Available at: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/european-chips-act_en (Accessed in June 2023).

⁴⁶ European Commission. European Chips Act. Available at: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/european-chips-act_en (Accessed in June 2023).

⁴⁷ European Union, 2022. European Chips Act Fact Sheet. Available at: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/europe-fit-digital-age/european-chips-act_en (Accessed in June 2023).

⁴⁸ DuPont, 2023. Semiconductor Manufacturing. Available at: <https://www.dupont.com/kalrez/semiconductor-manufacturing.html> <https://www.dupont.com/kalrez/semiconductor-manufacturing.html> (Accessed in June 2023).

⁴⁹ DuPont, 2011. DuPont™ Kalrez® Perfluoroelastomer parts. Proven reliability in aggressive wafer processing environments. Available at: https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/Semiconductor_Seals_Brochure.pdf (Accessed in June 2023).

⁵⁰ Kalrez® 0090 shows the highest TOTAL GS EP PVV 142 (Rev.5) certification rating and is therefore TOTAL qualified. In the test, the material was tested in its resistance to rapid gas decompression or explosion decompression concerning O-rings used in industrial valve industry. Source: <https://o-ring.info/catalog/datasheets/kalrezr-0090/kalrez-0090.pdf>

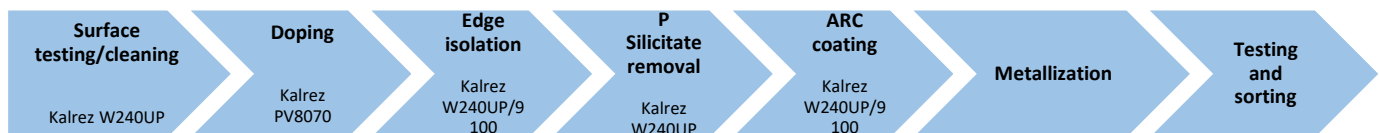
⁵¹ DuPont, 2023. Plasma Process. Available at: <https://www.dupont.com/kalrez/plasma-process.html> (Accessed in June 2023).

⁵² DuPont, 2017. DuPont™ Kalrez® 9500 for semiconductor SACVD and FCVD applications. Available at: https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/Kalrez_9500.pdf (Accessed in June 2023).

- **Thermal processes:** for sealing solutions in high-temperature environments such as wafer processing, chemical vapor deposition, atomic layer deposition, low-pressure chemical vapor deposition, oxidation, and diffusion processes⁵³;
- **Sub-fab seals:** used to prevent leakage and exhaust in piping and pumps that support foreline and wafer processing⁵⁴;
- **Back-end solutions:** critical for precision testing, wafer handling, packaging, and inspection processes to ensure the delivery of high-quality chips⁵⁵;
- **Wet processes:** employed in wafer processing environments, photolithography, copper plating, and etching, offering resistance to acid- and amine-based strippers.⁵⁶

Kalrez® perfluoroelastomer parts versatility allows for customization to meet the specific needs and requirements of semiconductor manufacturers. DuPont works closely with customers to develop sealing materials that precisely align with their unique manufacturing demands. **This adaptability ensures that Kalrez® perfluoroelastomer parts effectively addresses the challenges faced by semiconductor fabricators, enabling them to enhance their processes and achieve higher levels of productivity and reliability.**

Figure 6: Photovoltaic product selector guide in silicon wafer-based cell manufacturing processes.



Source: DuPont, 2023 (<https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/Kalrez-Perfluoroelastomer Parts For Photovoltaic Manufacturing Processes.pdf>)

Photovoltaic cell manufacturing involves the use of aggressive chemicals and operating under severe conditions, including high temperatures and reactive plasma.⁵⁷ The versatility of Kalrez® perfluoroelastomer parts may be illustrated in the wide range of applications of Kalrez® perfluoroelastomer parts in photovoltaic manufacturing processes. For feedstock production and abatement systems, Figure 6 shows which Kalrez® products are generally used in silicon wafer-based cell manufacturing processes.⁵⁸ In almost all steps of silicon wafer-based cell manufacturing processes, different grades of Kalrez® perfluoroelastomer parts are used and recommended for use.

⁵³ DuPont, 2023. Thermal Process. Available at: <https://www.dupont.com/kalrez/thermal-process.html> (Accessed in June 2023).

⁵⁴ DuPont, 2023. Kalrez® Sub-Fab Seals. Available at: <https://www.dupont.com/kalrez/sub-fab.html> (Accessed in June 2023).

⁵⁵ DuPont, 2023. Vespel® Back-End. Available at: <https://www.dupont.com/vespel/back-end.html> (Accessed in June 2023).

⁵⁶ DuPont, 2023. Kalrez® Wet-Process. Available at: <https://www.dupont.com/kalrez/wet-process.html> (Accessed in June 2023).

⁵⁷ DuPont, 2010. Perfluoroelastomer and fluoroelastomer seals for photovoltaic cell manufacturing processes. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/Perfluoroelastomer and Fluoroelastomer Seals for Photovoltaic Cell Manufacturing Processes.pdf> (Accessed in June 2023).

⁵⁸ DuPont, 2012. DuPont™ Kalrez® Perfluoroelastomer parts for photovoltaic manufacturing processes. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/Kalrez-Perfluoroelastomer Parts For Photovoltaic Manufacturing Processes.pdf> (Accessed in June 2023).

For instance, one of the grades is used specifically for edge isolation, ARC coatings, and PV cell manufacturing processes requiring resistance to fluorine-based plasma, including amorphous/microcrystalline silicon thin film deposition. **Kalrez® perfluoroelastomer parts' resistance to chemicals has been proven to withstand the demanding environments encountered in semiconductor manufacturing industry.**

Vespel® parts and shapes

DuPont™ Vespel® CR-6110 shapes are a carbon-fibre filled thermoplastic perfluoropolymer (PFA) that have demonstrated outstanding performance in aggressive wet chemical/plasma conditions and at elevated temperatures. Customers report improved preventative maintenance cycles by switching to Vespel® CR-6110 in wafer holding/processing, and cleaning and resist stripping operations. In dry plasma applications, Vespel® CR-6110 is also used as a thermal insulator and bearing in semiconductor processing.

3.3.3. Chemical processing industry and industrial manufacturing uses of Kalrez® perfluoroelastomer parts and Vespel® parts and shapes

Applications in this section include chemical processing and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools). DuPont's Kalrez® perfluoroelastomer parts are widely used in the Chemical Processing Industry (CPI) due to their thermal and chemical resistance. Kalrez® perfluoroelastomer parts find applications in mechanical seals, valves, pumps, filters, O-rings, and custom parts. The broad chemical compatibility of Kalrez® perfluoroelastomer parts make them a reliable choice for handling aggressive chemicals and demanding process conditions. Moreover, the ability of Kalrez® perfluoroelastomer parts to withstand a wide range of temperatures, from low (-42°C) to elevated levels, further enhance their suitability for CPI applications. Original equipment manufacturers, chemical processing plants, and refineries rely on Kalrez® perfluoroelastomer parts to ensure reliable and long-lasting sealing solutions, while minimizing downtime and optimizing operational efficiency in chemical processes.⁵⁹

The chemical processing industry holds a significant position in the global economy, with its contributions exerting a substantial impact on various aspects of industrial production. According to Eurostat, in the EU, the chemical industry accounted for approximately 7% of the EU-27's Gross Value Added (GVA) in recent years. In 2019, the chemical sector employed around 1.2 million people across the EU member states. **The industry encompasses diverse activities, including the production of chemicals, pharmaceuticals, plastics, and other chemical-based products.** These products serve as essential inputs for numerous downstream industries across different sectors of the economy, such as agriculture, construction, automotive, and healthcare.

With an added value of 335 billion EUR in 2018, the chemical sector (including pharmaceuticals, rubber, and plastics) is the largest sector in the EU27 manufacturing industry, accounting for 17.7% of

⁵⁹ DuPont, 2023. Kalrez® perfluoroelastomer parts. Available at: <https://www.dupont.com/kalrez.html> (Accessed in June 2023).

added value.⁶⁰ Chemicals is the second largest sector in employment (3.4 million people), contributing 12.3% of EU27 manufacturing employment. The sector generates an even greater number of indirect jobs – up to three times higher than through direct employment.^{61, 62}

In addition to chemical processing, industrial manufacturing stands as a cornerstone of the European Economic Area's (EEA) economic vitality and global competitiveness. Spanning diverse sectors such as automotive manufacturing, textiles, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools, this multifaceted industry plays a pivotal role in shaping the EEA's economic landscape, technological advancement, and job creation. **In 2022, the value of sold industrial production in the EU corresponded to 6,179 billion EUR, which was an increase of 19% with the year before that, showing the increasing importance of the sector.**⁶³

The EEA's progress in industrial manufacturing, particularly in sectors like automotive manufacturing and scientific laboratory instruments, reflects its commitment to innovation. Cutting-edge technologies and engineering innovations developed within these industries often spill over into other sectors.

Figure 7: Kalrez® perfluoroelastomer parts /Vespel® valve stem packing.



Source: DuPont, 2023 (<https://www.dupont.com/knowledge/kalrez-kvsp-valve-stem-packing.html>)

⁶⁰ Cefic, 2023. Our contribution to EU27 industry. Available at: <https://cefic.org/a-pillar-of-the-european-economy/facts-and-figures-of-the-european-chemical-industry/our-contribution-to-eu-industry/#h-chemicals-is-the-leading-sector-accounting-for-17-7-of-eu27-manufacturing-added-value> (Accessed in June 2023).

⁶¹ Eurostat, 2023. Production and international trade in chemicals. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Production_and_international_trade_in_chemicals (Accessed in June 2023).

⁶² Cefic, 2023. Our contribution to EU27 industry. Available at: <https://cefic.org/a-pillar-of-the-european-economy/facts-and-figures-of-the-european-chemical-industry/our-contribution-to-eu-industry/#h-chemicals-is-the-leading-sector-accounting-for-17-7-of-eu27-manufacturing-added-value> (Accessed in June 2023).

⁶³ Eurostat, 2023. Industrial production statistics. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Industrial_production_statistics#The_five_largest_manufacturing_activities (Accessed in August 2023).

In the chemical processing industry, the applications of Kalrez® perfluoroelastomer parts are highly varied. For instance, in chemical plants, Kalrez® valve seals are frequently used to prevent leaks. These control valve gland seals must be extremely effective.⁶⁴ Kalrez® valve stem packings are resistant to 60% pentane/40% butane, hexane, acetone, and acid water. They have outperformed the incumbent solutions and resulted in no identified gland leaks in the valves after extensive testing. Figure 7 illustrates the functioning of Kalrez® in a valve seal.

Another application of Kalrez® perfluoroelastomer parts in the chemical processing industry is in chemical reactors. Chemical reactors are systems that use chemical reaction to transform raw materials into new products. **Since these raw materials are often aggressive and are continuously rotated by a stirrer, the seals need to be reliable and safe.**⁶⁵ The reactors are cleaned sometimes as much as 3 times a year, typically with demanding cleaning processes.

In chemical environments, ball valves are primarily used for shutting off feeds of both gases and liquids. Figure 8 shows how the Kalrez® perfluoroelastomer parts are placed in the ball valves. The sealing materials in these environments are crucial, and Kalrez® perfluoroelastomer parts have been exceeding performance requirements of 24 months, resulting in significant cost savings by reducing maintenance and associated shutdowns as well as reducing the human exposure and leaks.⁶⁶ The Kalrez® perfluoroelastomer parts exhibit very little or no seal degradation.⁶⁷

⁶⁴ DuPont, 2022. DuPont™ Kalrez® Valve Stem Packing (KVSP™) Valve sealing in chemical plants. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%E2%84%A2%20Kalrez%C2%AE%20and%20Vespel%C2%AE%20-%20Polymeric%20Solutions%20for%20Valve%20Sealing%20in%20Extreme%20Environments.pdf> (Accessed in June 2023).

⁶⁵ DuPont, 2022. DuPont™ Kalrez® Spectrum™ 7375 Perfluoroelastomer parts for mechanical seals in a chemical reactor. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%E2%84%A2%20Kalrez%C2%AE%207375%20Perfluoroelastomer%20Parts%20for%20Mechanical%20Seals%20in%20a%20Chemical%20Reactor.pdf> (Accessed in June 2023).

⁶⁶ DuPont, 2022. DuPont™ Kalrez® 0090 Perfluoroelastomer parts for ball valves in refineries. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%E2%84%A2%20Kalrez%C2%AE%200090%20Perfluoroelastomer%20Parts%20for%20Ball%20Valves%20in%20Refineries.pdf> (Accessed in June 2023).

⁶⁷ NORSOK is a series of standards developed by the Norwegian petroleum industry for oil and gas companies. Their main objectives are to ensure safety, enhance value, and promote cost-effectiveness in petroleum industry developments and operations. These standards are designed to replace individual oil company specifications and also serve as reference points in governmental regulations.

Figure 8: Kalrez® O-ring in ball valves.



Source: DuPont, 2022

<https://www.dupont.com/content/dam/dupont/amer/us/en/kalrez/public/documents/en/DuPont%E2%84%A2%20Kalrez%C2%AE%200090%20Perfluoroelastomer%20Parts%20for%20Ball%20Valves%20in%20Refineries.pdf>

Kalrez® O-rings also find application in the production of pharmaceutical glass containers. The manufacturing process for these tubes involves heating, bending, and cutting long glass tubes using specialized equipment. When subjected to high temperatures, metal O-rings can potentially harm the glass. Consequently, Kalrez® O-rings are used to prevent any damage during the manufacturing process. **As the tubes are rotated by a stainless-steel wheel, a Kalrez® O-ring is positioned on the outside to ensure there is no direct contact between the wheel and the glass tube.**

Operations in the chemical processing industry require excellent sealing performance. **Given the catastrophic consequences of a fault in a sealing system, industries frequently rely on DuPont's Kalrez® products.**

Vespel® parts and shapes

The Vespel® business offers a PFA/carbon fibre composite, CR-6100, for aggressive chemical environments. Formulated to match the coefficient of thermal expansion of steel in the xy plane, this composite delivers exceptional performance up to 260°C. The PFA provides lubrication to pump even under dry conditions. Vespel® CR-6100 can even handle sulfuric acid/hydrogen peroxide mixtures that quickly degrade most other substances. While primarily used for petroleum refining and petrochemicals, it is also used in applications for power generation, pulp and paper manufacturing, fertilizer manufacturing, and general chemical manufacturing. Vespel® CR-6100 improves the safety, life, and efficiency of centrifugal pumps. We estimate that due to this efficiency improvement 6.5 billion kilowatt-hours per year are currently being saved across EMEA, resulting in lower CO₂ emissions.

Ball valve seats and seals are used to achieve bubble-tight closure in high chemical hazard and extreme temperature processes. Typically for valves that need to seal at high temperatures and high pressures, metal seated valves are used consisting of a tungsten carbide (to 260 °C) or chromium carbide (> 260 °C) coating on the ball and seats. Because the compressive modulus of metals is very high (> 500GPa), it is less compliant and cannot make an effective seal and make the valve “bubble tight.” Due to creep,

many polymers become difficult to use much above their glass transition temperature at higher pressure classes. Typical benefits observed using Vespel® parts and shapes as valve seat material can include: increased life and reliability of equipment, lower fugitive emissions, reduced operation downtime, less frequent maintenance, reduced overall operation cost, and lower operating torque.

Vespel® parts are used in glass handling industry with typical applications including take-out inserts, sweep-out fingers, stacker and transfer pads, guides and dead plate, as Vespel® parts are an excellent choice for hot glass handling components. These parts use PTFE in the manufacturing process. DuPont™ Vespel® parts and shapes increases plant reliability and lowers operation costs by delivering extended life and less glass checking compared with conventional glass handling technology.⁶⁸

Many analytical instruments require a number of components that need high performance properties that can only be met by Vespel® materials.⁶⁹ From oven components and column ferrules in gas chromatographs, to electrical insulators in mass spectroscopy detectors Vespel® parts and shapes is used in extreme conditions to seal, insulate, and protect a variety of components for sensitive equipment. Vespel® parts and shapes not only survive high temperatures but performs well in applications where thermal cycling would damage other components.

Vespel® bushings are used in a variety in industries such as in the textile machines, insulating parts in welding torchers (welding tools are then used in multiple industries that use welding such as construction, transportation, etc.).

3.3.4. Transportation and aerospace industry and their use of Vespel® parts and shapes and Kalrez® perfluoroelastomer parts

DuPont's Vespel® parts and shapes are widely used in the transportation industry due to their heat resistance, wear resistance, and low-friction properties. These characteristics make them suitable material for automotive and aerospace applications, where they are commonly utilized as washers, bushings, and seal rings. This section provides an overview of the transportation sector's reliance on Vespel® and Kalrez® products, highlighting their significant and widespread role in this industry.

The transportation industry plays a fundamental role in the EU society, making multidimensional contributions that impact various aspects of society. Transportation is a cornerstone of the EU integration and is fundamental for facilitating the free movement of individuals, services, and goods.⁷⁰ By facilitating such movement, the transportation sector enhances accessibility, mobility, social activities, cultural activities, economic activities, and trade, thereby fostering economic growth

⁶⁸ DuPont, 2009. DuPont™ Vespel® Glass Handling Technology Innovation for the glass industry. Available at: https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/K22677-1_Vespel_Glass_Handling_Brochure.pdf (Accessed in June 2023).

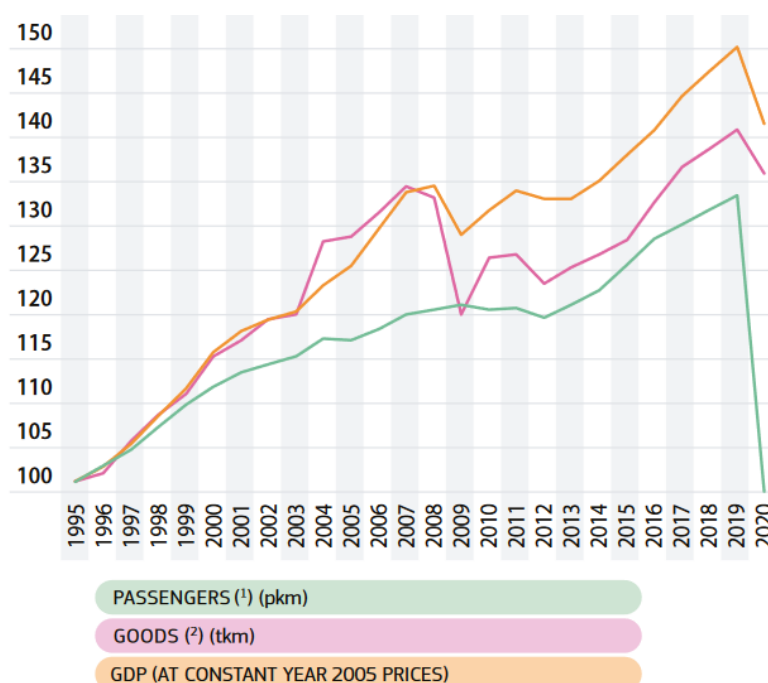
⁶⁹ DuPont, 2007, DuPont™ Vespel® Insulator Solutions. Available at: https://d2zo35mdb530wx.cloudfront.net/_legacy/UCPthyssenkruppBAMXNA/assets.files/tkmna_com/products/collateral/plastics/dupont-vespel/vespel_insulatorsolutions.pdf (Accessed in June 2023).

⁷⁰ European Commission, Directorate-General for Mobility and Transport, 2022. EU transport in figures – Statistical pocketbook 2022, Publications Office of the European Union. Available at: <https://data.europa.eu/doi/10.2832/216553> (Accessed in June 2023).

and development.⁷¹ It has also been shown that economic opportunities are, to an increasing extent, linked to individuals' mobility. As a result, **the transportation sector plays a crucial role in driving economic progress and ensuring the efficient functioning of modern society, both at an individual and global level.**⁷²

Figure 9 illustrates how the transportation industry has seen tremendous growth over the past two decades.⁷³ Passenger transportation, including passenger cars, motorcycles, buses, trams, metros, railways, intra-EU air, and intra-EU sea transportation, has experienced significant expansion. Additionally, the transportation of goods via road, rail, inland waterways, oil pipelines, intra-EU air, and intra-EU sea transportation has witnessed substantial growth. This growth in the reliance on transportation aligns with the overall increase in Gross Domestic Product (GDP). **This bidirectional relationship between economic growth and infrastructure has also been found in research.**⁷⁴

Figure 9: Passenger, goods, GDP 1995 – 2020 (Year 1995 = 100)



Source: European Commission, DG Mobility and Transport, 2022 (<https://data.europa.eu/doi/10.2832/216553>)
 NB: (1) Passenger cars, powered two-wheelers, busses & coaches, tram & metro, railways, intra-EU air, intra-EU sail – **pkm: passengers per kilometre**; (2) Road, rail, inland waterways, oil pipelines, intra-EU air, intra-EU sea – **tkm: tonnes per kilometre**
 The y-axis (green line) represents the number of passengers indicated in pkm, the y-axis (pink line) represents the amount of goods that were transferred in tkm and the y-axis (orange line) represents the GDP (index with 1995 as the base year).

⁷¹ Rodrigue, J.P., 2020. The Geography of Transport Systems. Available at: <https://doi.org/10.4324/9780429346323> (Accessed in June 2023).

⁷² Ibid.

⁷³ European Commission, Directorate-General for Mobility and Transport, 2022. EU transport in figures – Statistical pocketbook 2022, Publications Office of the European Union. Available at: <https://data.europa.eu/doi/10.2832/216553> (Accessed in June 2023).

⁷⁴ Mohmand, Y. T. et al., 2021. Investigating the causal relationship between transport infrastructure, economic growth and transport emissions in Pakistan. Research in Transportation Economics. Available at: <https://doi.org/10.1016/j.retrec.2020.100972> (Accessed in June 2023).

The transportation industry holds significant importance for the EU and global economy, with the transportation services sector contributing approximately 5% of the EU-27's Gross Value Added (GVA) in 2020, amounting to around 555 billion EUR.⁷⁵ 5,237,100 individuals were employed in road transportation in the EEA in 2019.⁷⁶

Road applications: Automotive industry

Vespel® parts and shapes have diverse applications in the automotive industry, including Internal Combustion Engine (ICE), Electrical Vehicle (EV) systems, driveline components, engine components, powersports vehicles, and turbochargers.⁷⁷ Please refer to Table 4 in Annex I for an overview of Vespel® products that are used in the automotive industry, highlighting the heterogeneity in shapes and properties per Vespel® component.⁷⁸ This section will provide a non-exhaustive overview of the use of Vespel® parts and shapes products in the automotive industry.

The automotive industry utilizes Vespel® parts and shapes for various purposes, such as in the ICE vehicle's air management system, in brake pad sensors, and in powertrains. ICE applications rely on the combustion of fuel-air mixtures.⁷⁹ For these applications, Vespel® components offer advantages such as the absence of heat exchanges in the working fluid stream. Some key application areas in ICE vehicles are also illustrated in Figure 10.

⁷⁵ European Commission, Directorate-General for Mobility and Transport, 2022. EU transport in figures – Statistical pocketbook 2022, Publications Office of the European Union. Available at: <https://data.europa.eu/doi/10.2832/216553> (Accessed in June 2023).

⁷⁶ European Commission, Directorate-General for Mobility and Transport, 2022. *EU transport in figures – Statistical pocketbook 2022*, Publications Office of the European Union, <https://data.europa.eu/doi/10.2832/216553>

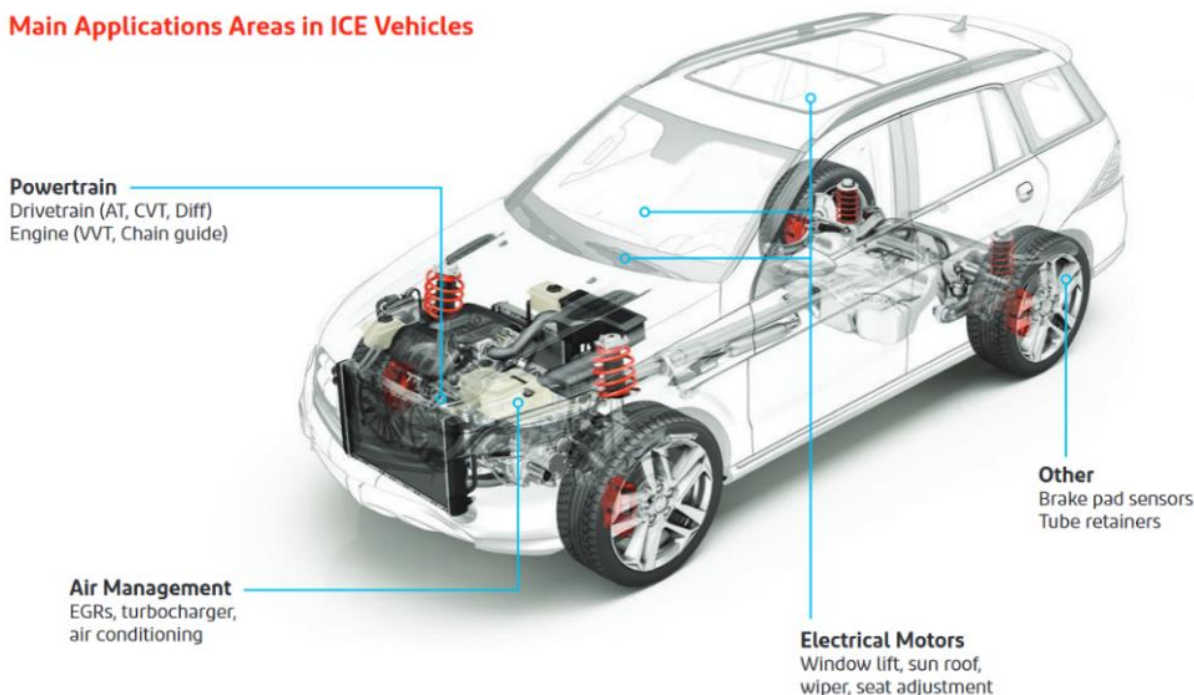
⁷⁷ DuPont, 2023. DuPont Automotive applications. Available at: <https://www.dupont.com/vespel/automotive.html> (Accessed in June 2023).

⁷⁸ DuPont, 2022. DuPont™ Vespel® Parts and Shapes for Automotive Applications (xEV & ICE). Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20for%20Automotive%20Applications%20-%20VPE-A40093-00-A0323.FinalRev.pdf> (Accessed in June 2023).

⁷⁹ Taylor, C. F., 1985. Internal Combustion Engine in Theory and Practice. MIT press. Available at: [https://ftp.idu.ac.id/wp-content/uploads/ebook/tdg/ADVANCED%20ENGINE%20TECHNOLOGY%20AND%20PERFORMANCE/The%20Internal-Combustion%20Engine%20in%20Theory%20and%20Practice.%20Vol.%20I%20Thermodynamics,%20Fluid%20Flow,%20Performance%20\(%20PDFDrive%20\).pdf](https://ftp.idu.ac.id/wp-content/uploads/ebook/tdg/ADVANCED%20ENGINE%20TECHNOLOGY%20AND%20PERFORMANCE/The%20Internal-Combustion%20Engine%20in%20Theory%20and%20Practice.%20Vol.%20I%20Thermodynamics,%20Fluid%20Flow,%20Performance%20(%20PDFDrive%20).pdf) (Accessed in June 2023).

Figure 10: Main application areas for Vespel® parts in ICE vehicles.

Main Applications Areas in ICE Vehicles



Source: DuPont, 2022

<https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20for%20Automotive%20Applications%20-%20VPE-A40093-00-A0323.FinalRev.pdf>

Automotive gearboxes and transmissions require lubrication to reduce friction and heat generated by metallic gears. However, some applications, like the wastegate, operate without lubrication. In both cases, **materials used must meet specific requirements for low wear rates and durability, delivering both low Coefficient of Friction (CoF) and survivability in high Pressure-Velocity (PV) conditions.**⁸⁰ **High temperature resistance is crucial, especially for automotive ICE powertrain applications.** While a well-lubricated engine typically reaches temperatures of 90°C to 105°C, a non-lubricated turbocharger wastegate can exceed 300°C. Vespel® SP resin materials possess high temperature resistance, withstanding continuous use temperatures up to 260°C and even tolerating excursions beyond 350°C. Due to this high temperature resistance and inability to melt, they are a reliable choice for automotive applications. The bushings in the actuator must be able to perform at these elevated temperatures, delivering smooth operations and guiding the connecting rod within the wastegate actuator to ensure control of the turbocharger at variable pressures and speeds.⁸¹

Vespel® parts and shapes are also used as components in automotive turbochargers and Exhaust Gas Recirculation (EGR) systems.⁸² The bushings and washers resist the high temperatures that are required in the turbocharging applications, contributing to increased fuel efficiency and reduced emissions.

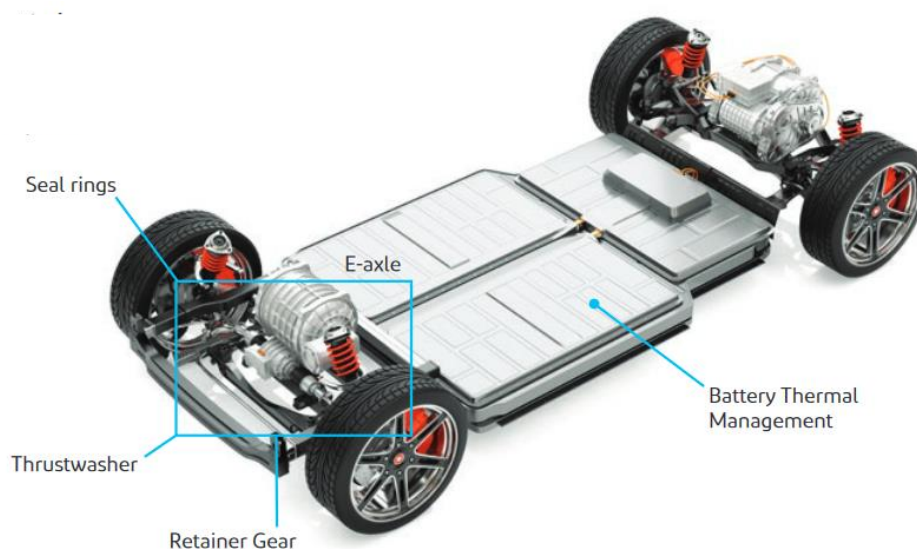
⁸⁰ DuPont, 2022. DuPont™ Vespel® Parts and Shapes for Automotive Applications (xEV & ICE). Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20for%20Automotive%20Applications%20-%20VPE-A40093-00-A0323.FinalRev.pdf> (Accessed in June 2023).

⁸¹ DuPont, 2023. DuPont™ Vespel® SP-21 Guide Bushings for Turbocharger Wastegate Actuators – Case Study. Available at: <https://www.dupont.com/knowledge/vespel-actuator-guide-bushings.html> (Accessed in May 2023).

⁸² DuPont, 2023. DuPont™ Vespel® Turbochargers. Available at: <https://www.dupont.com/vespel/turbochargers-egr.html> (Accessed in June 2023).

As the automotive industry continues to transition towards electrification to reduce carbon emissions, there is an increasing demand for innovative materials.⁸³ For road transportation, there also is a short-term trend expected to move to electric and hydrogen hybrids, with a dual cell for road transportation. **DuPont's Vespel® parts and shapes are used in EVs, including Plug-in Hybrid Electric Vehicles (PHEVs), Battery Electric Vehicles (BEVs), and Fuel Cell Electric Vehicles (FCEVs).**⁸⁴ These components are primarily used in transmissions, differentials, and motors in the form of wear rings, hydrogen gas seals, bushings, thrust washers, and thrust plugs (see Figure 11). The thrust plugs, which are made with Vespel® parts and shapes, allow for application of the right amount of friction for smooth opening and closing, as well as keeping windows in place when partially opened. Moreover, they improve the service life of door slide motors, actuator bushings, cooling fan boxes, and gear boxes for adjusting steering and seating position. **For EV battery cells, Vespel® parts and shapes are generally used in the form of terminal seals, isolation rings, and spacers.**⁸⁵

Figure 11: Illustration of Vespel® parts that are used in Electrical Vehicle Applications.



Source: DuPont, 2022

(<https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20and%20Shapes%20in%20Electrical%20Vehicles%20-%20sell%20sheet%20-%20VPE-A40075-00-A0422-FinalRev.pdf>)

Thrust washers (see Figure 12) play a crucial role in e-axes, differentials, torque vectoring, and disconnect systems. Thrust washers are designed to absorb axial forces, act as spacers between rotating and stationary components, prevent wear, minimize seizing and torque loss, and withstand

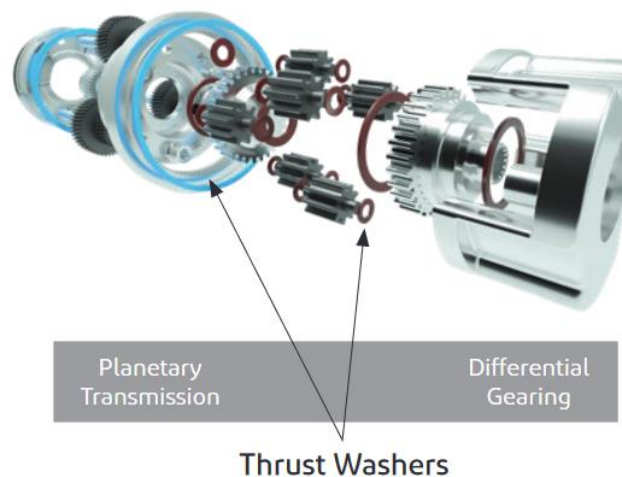
⁸³ DuPont, 2022. DuPont™ Vespel® Parts and Shapes for Automotive Applications (xEV & ICE). Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20for%20Automotive%20Applications%20-%20VPE-A40093-00-A0323.FinalRev.pdf> (Accessed in June 2023).

⁸⁴ DuPont, 2022. DuPont™ Vespel® Parts and Shapes for Electrical Vehicle Applications (PHEV, BEV, FCEV). Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20and%20Shapes%20in%20Electrical%20Vehicles%20-%20sell%20sheet%20-%20VPE-A40075-00-A0422-FinalRev.pdf> (Accessed in June 2023).

⁸⁵ DuPont, 2023. DuPont™ Vespel® for EV Battery Cell Thermal Management Applications. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/Vespel-For-EV-Battery-Cell-Thermal%20Management-Application-Profile-VPE-A40071-00-A0921.FinalRev.pdf> (Accessed in June 2023).

high pressure and velocity.⁸⁶ Because electric motors can generate higher torque than ICEs vehicle designs can simplify transmission systems, but at the cost of putting more force on the drive components. **Vespel® thrust washers have already demonstrated their performance in various heavy-duty applications, including tractor (farming, construction), truck (primarily industrial use trucks such as those used in mining and construction), and car transmissions.** They can operate in normal oil mist environments, reaching PVs (pressure-velocity) of up to 40 millipascal-seconds (mPa·s) and speeds of 7,000 revolutions per minute (rpm).⁸⁷ Light weighting is key to extending the range of electric vehicles. Using high performance bearing and thrust washers such as Vespel® parts and shapes, significant design simplifications and weight reduction can be achieved by eliminating complex oil lubrication systems. **The flexibility of Vespel® parts allows for optimized designs by adjusting the contact area, both externally and internally, based on known loading and speed conditions.**

Figure 12: Illustration of thrust washers.



Source: DuPont, 2022

(<https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20and%20Shapes%20in%20Electrical%20Vehicles%20-%20sell%20sheet%20-%20VPE-A40075-00-A0422-FinalRev.pdf>)

Other important applications of Vespel® parts and shapes that are used in the ground transport applications are:^{88 89}

- **Seal rings.** These rings work dynamically to provide a seal between the shaft and the housing at specific pressures and speeds. Lifetime, minimization of leakage, and reliability are critical

⁸⁶ DuPont, 2022. DuPont™ Vespel® Parts and Shapes for Electrical Vehicle Applications (PHEV, BEV, FCEV). Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20and%20Shapes%20in%20Electrical%20Vehicles%20-%20sell%20sheet%20-%20VPE-A40075-00-A0422-FinalRev.pdf> (Accessed in June 2023).

⁸⁷ DuPont, 1997. DuPont™ Automotive Vespel®. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/vesautoe.pdf> (Accessed in June 2023).

⁸⁸ DuPont, 1997. DuPont™ Automotive Vespel®. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/vesautoe.pdf> (Accessed in June 2023).

⁸⁹ DuPont, 2022. DuPont™ Vespel® Parts and Shapes in Internal Combustion Engine Applications. Available at: <https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Vespel%20Parts%20and%20Shapes%20in%20Internal%20Combustion%20Engine%20Applications%20-%20sell%20sheet%20-%20VPE-A40076-00-A0422-FinalRev.pdf> (Accessed in June 2023).

factors in seal ring design, as they directly affect shifting operations. Seal rings are used in tractor and other earth moving equipment transmissions, passenger car automatic gearboxes, and automotive continuously variable transmissions;

- **Valve seats.** These reduce oil leakages within the transmission;
- **Thrust plugs.** These directly fit into the rotor shaft, are specifically used in applications like windscreen wipers, window lifts, sunroofs, and seat adjustments. These parts are designed to withstand axial loads while resisting creep and wear even in dirty environments;
- **Wear pads.** These Vespel® parts and shapes are installed in the metallic support of brake pads. They thermally and electrically insulate the wire connecting the brake wear warning light. These wear pads must provide low and consistent wear rates without melting or depositing any film on the disc. Manual transmissions in on road and off-road vehicles use shift fork wear pads to prevent metal to metal contact.
- **Bushings, washers, ball bearing cages, insulations, and thrust plugs.** These are generally used within electrical motors. These components must withstand axial and radial loads coupled with high speeds.
- **Military ground vehicles also utilize Vespel® for bearings, bushings, washers, seal rings.** Several grades of Vespel® must meet ASTM D6456-10⁹⁰ which can be required from some transportation customers.

The above examples provide a non-exhaustive overview of the use of the use of Vespel® parts and shapes in the automotive industry. **Importantly, the Vespel® parts and shapes are available as different components and in different grades, which all have their own specific characteristics and properties. Therefore, the specific grade of Vespel® can be designed and adapted according to the requirements of the application.**

A restriction on PFAS without a derogation for the transportation industry could have significant implications for the EU's ability to achieve its net-zero economy goal by 2050 as outlined in the European Green Deal. The Green Deal aims to transition the EU and its Member States to a sustainable economy with reduced reliance on fossil fuels. Batteries play a crucial role in achieving objectives related to low-emission mobility, decarbonized energy generation, and digitalization, as highlighted by the European Commission. The European Commission recognizes batteries as a strategic value chain and acknowledges their importance in enabling sustainable development, green mobility, clean energy, and climate neutrality. They are particularly vital in the shift toward electric vehicles.⁹¹

In this context, DuPont's Vespel® parts and shapes in the transportation area, such as in uses related to batteries, are important for zero-emission vehicles. By providing a more sustainable energy storage solution, providing engineered parts in EVs, and turbochargers, these products are contributing to reduce greenhouse gas emissions and support the transition to a low-carbon economy

⁹⁰ Standard specification for finished parts made from polyimide resins. Available at: <https://www.astm.org/d6456-10r18.html> (Accessed in June 2023).

⁹¹ RECHARGE, 2023. Application for derogations from PFAS REACH restriction for specific uses in batteries – First submission
. Submission number: cb6a7d0a-caa1-42fa-a806-f7410538f8b9.

and DuPont's focus on sustainability and circularity aligns with the objectives of the European Green Deal, making DuPont an important player in the transition to a greener and more sustainable future.⁹²

Aerospace applications

DuPont performed an SEA on the use of PFAS within the Aerospace Supply Chain for Vespel® parts and shapes and Kalrez® perfluoroelastomer parts. This SEA will be provided as an attachment in a separate submission.

The EEA plays a fundamental role in the aerospace technologies manufacturing industry with its dynamics. Global demand for more aerospace goods has indirectly supported the expansion of market opportunities for the EEA aerospace and defence firms. **In 2019, the total turnover of the European aerospace and defence industry exceeded 250 billion euros, providing jobs for an estimated 890,000 individuals in the aerospace and defence field.**⁹³

Airlines have committed to achieving net-zero emissions by 2050. Actors in the supply chain are beginning to develop more sustainable parts and aircrafts.^{94,95} The aerospace sector places significant emphasis on diminishing fuel-related emissions by shifting towards alternative fuel options like battery-electric and hydrogen, as well as upgrading aircraft fleets to enhance fuel efficiency.^{96,97}

Vespel® parts and shapes have diverse applications in the aerospace applications. Vespel® parts and shapes can be formed into different shapes and sizes to be used as bushings, wear strips, wear pads, track liners, bumpers and washers in aircraft engines. **Vespel® products are used on nearly all civil airline jets, engines and turboprops in service, as well as military jets and helicopters. It is highly likely that all of these aircraft will use at least one type of Vespel® component relevant to the scope of the restriction.** This section will provide a non-exhaustive overview of the use of Vespel® parts and shapes products in the aerospace industry and aircraft engines.

Within aircraft engines, Vespel® components are used in many areas to **reduce the frictional coefficient between moving components.** Vespel® components can be present as various shapes and sizes to fit specific areas within an engine. It is important to note that some of the key benefits of Vespel® are that parts are lightweight, can be used continuously at 260°C, are resistant to hydrocarbon fuels, are formulated to function over a wide temperature range, and can be machined easily to fulfil

⁹² European Commission, 2022. Zero emission vehicles: first 'Fit for 55' deal will end the sale of new CO2 emitting cars in Europe by 2035. Available at: https://ec.europa.eu/commission/presscorner/detail/en/ip_22_646 (Accessed in June 2023).

⁹³ Statista, 2022. European aerospace industry – statistics & facts. Available at: <https://www.statista.com/topics/4130/european-aerospace-industry/#topicOverview> (Accessed in August 2023).

⁹⁴ McKinsey&Company, 2022. A dual approach to decarbonization in aerospace. Available at: <https://www.mckinsey.com/industries/aerospace-and-defense/our-insights/future-air-mobility-blog/a-dual-approach-to-decarbonization-in-aerospace> (Accessed in August 2023).

⁹⁵ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

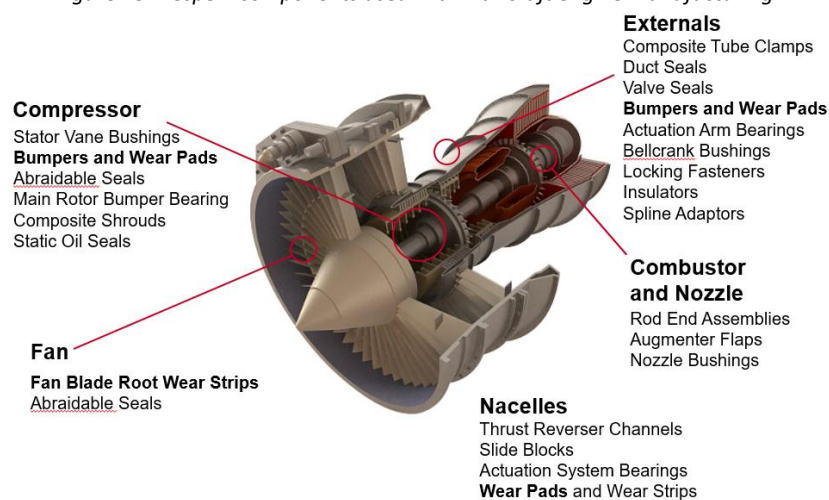
⁹⁶ McKinsey&Company, 2022. A dual approach to decarbonization in aerospace. Available at: <https://www.mckinsey.com/industries/aerospace-and-defense/our-insights/future-air-mobility-blog/a-dual-approach-to-decarbonization-in-aerospace> (Accessed in August 2023).

⁹⁷ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

specific design criteria. Parts and components are machined to precise measurements to perfectly fit into the areas needed; any increase in weight or dimensions outside of specification would disrupt the function of the engine. Unless already specified as alternate, any material change would require thousands of hours of engine testing before they are put into commercial engines.

Components that are used in aerospace applications need to withstand temperatures over 315°C (for short durations) over the expected lifetime of the engine, whilst also delivering the specified functionality without a decrease in performance. Without Vespe[®] components, the metal-on-metal interactions would cause excessive vibration and higher levels of friction. This could lead to galling and metallic wear debris build up within the engine. Should this occur, it can be fatal to the engine, causing potential short circuits as well as locking components, resulting in engine failure.

Figure 13: Vespe[®] components used within aircraft engine manufacturing.



Source: DuPont, 2022

(<https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/DuPont%20Kalrez%20and%20Vespe%20Parts%20for%20the%20Aerospace%20Industry%20-%20Overview%20Brochure%20-%20VPE-A40093-00-A0323.pdf>)

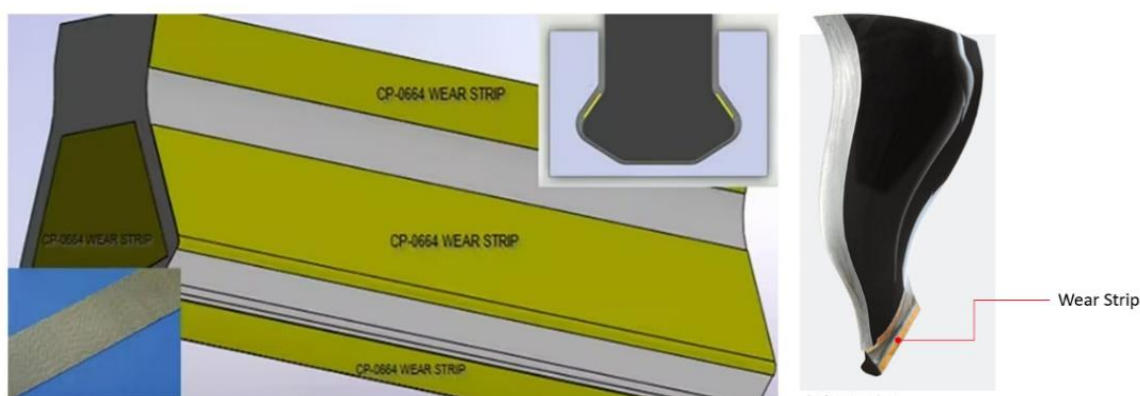
Figure 13 illustrates the extensive use of Vespe[®] products in aircraft engine manufacturing. **The use of these components is typically where there is relative motion that could cause vibrations or mechanical wear of the components in contact.** Common applications in an aircraft engine are in variable stage and actuation systems in engine compressors, bleed valve systems, valves, and actuators for nacelles and aircraft surfaces.⁹⁸ Importantly, while Figure 13 gives an overview of the variety of Vespe[®] components that are used, Vespe[®] uses are not limited to this overview.

Vespe[®] wear strips are PTFE fabric composites and are widely used in aircraft engine components. Wear strips slow the wear rate by providing a self-lubricating, low friction gliding functionality, and function well in dirty environments. These wear strips are used on the fan blade root in aircraft engines and in nacelles to assist with the insertion of the engine and prevent vibrational wear.

⁹⁸ DuPont, 2023. Vespe[®] Brings High-Temperature Performance to Aircraft Bushings and Washers - Case Study. Available at: <https://www.dupont.com/knowledge/vespel-bushings-washers.html> (Accessed in June 2023).

For the fan blade roots' applications of wear strips, the wear strips are specifically designed to reduce the friction between the fan blade and the rotating disk, which houses the fan blade root. This helps to reduce wear and fretting fatigue caused via operation, whilst in metallic fan blades wear strips deliver this same functionality and provide additional corrosion protection.⁹⁹ Vespel® wear strips help to more accurately align composite fan blades within the compressor assembly. If not set properly or consistently, operation of the engine could be significantly impacted. **Due to the high rotational speeds and mass, any imbalance will** result in an increase in vibration leading to premature wear across the entire fan blade assembly and other connected engine systems. Figure 14 illustrates the functioning of Vespel® wear strips on fan blades.

Figure 14: Vespel® wear strips used on fan blades.

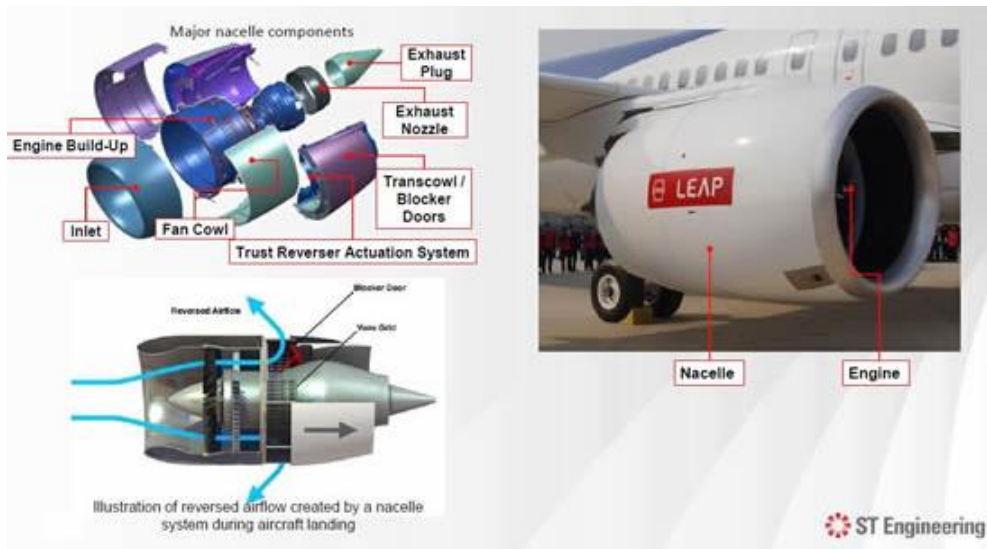


Source: Based on DuPont's internal data, 2023.

Wear strips are also used in engine nacelles, the casing that houses the engine, providing efficient aerodynamics during flight and attaching the engine to the plane. Figure 15 gives an overview of the nacelle in relation to the engine itself. **Wear strips are beneficial for use in nacelles to assist with the insertion of the engine, making it easier to align the engine within the nacelle.** Wear strips therefore help to reduce the likelihood of damaging the engine components during assembly. Additionally, these wear strips will reduce the engine vibration against the nacelle during operation. This vibration causes an acceleration of wear rate on the engine components and the nacelle itself. Vespel® wear strips increase the mean time between repairs by serving as sacrificial components to protect hard-to-machine metal engine components. Vespel® wear strips are also used in thrust reversal systems for breaking. While thrust reversal systems are not particularly high temperature or high speed, Vespel® wear strips perform well in dirty environments where oils and greases would pick up debris and eventually become an abrasive mass.

⁹⁹ RPA (2023): Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

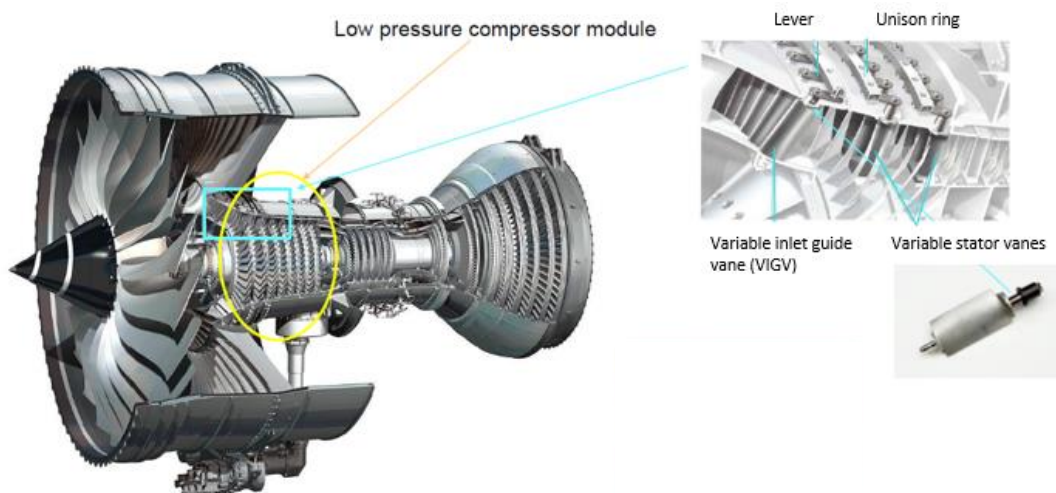
Figure 15: Overview of an engine nacelle.



Source: DuPont, 2022 (<https://www.blueskynews.aero/issue-479/ST-Engineering-to-acquire-nacelle-manufacturer-MRA-Systems.html>)

On top of wear strips, washers, bushings, and wear pads are also typically made from Vespel® products. Some of these grades contain fillers to further enhance the low friction performance of parts in areas where oil-based lubrication cannot be used. One of the key benefits of using Vespel® parts in jet engine compressors is their ability to withstand high temperatures and pressures without degrading or losing their mechanical properties. These properties are particularly important in the environment of a jet engine, where even small changes in performance can have a significant impact on overall engine efficiency and reliability.

Figure 16: Cross section of an engine, indicating bushing and washer uses. Core Vespel application variable vane bushes in Jet Engines.



Source: Based on DuPont's internal data, 2022

Figure 16 shows how washers and bushings are used on the rotating vanes of the compressor section of the engine. **Depending on the type of engine, there can be up to 600 bushings in the compressor section.** Without them, the ability to actuate variable stator vanes inside the compressor would require significantly larger actuators to overcome the friction between sliding components, resulting

in a significant increase in weight. Bushings are also used on the lever to activate the stator vanes and on the outside casings. In addition, the reduction of wear and improved efficiency by minimizing energy losses due to friction is an added benefit. Not only do Vespel® bushings provide lubricity, but Vespel® is often used as a sacrificial component in moving assemblies to safeguard hard-to-machine metal components. Vespel® bushings provide the lowest wear while preventing galling of metal components.

Many Vespel® parts are used in the compressor section of the engine to deliver functionality whilst also providing creep and impact resistance, dimensional stability, and thermal resistance. This includes a number of engine components, including variable stator vanes and torque box/bell crank linkage arms. Thrust washers using Vespel® grades are used in the compressor section to transfer axial loads between rotating and stationary parts and to provide a low friction interface between the compressor rotor and stator subassemblies, helping to improve efficiency. Washers are used in numerous places throughout an engine and can sometimes form part of the bushing. All of these benefits result in aircraft engines that are more fuel efficient, are more reliable and thus safer, and are lower cost to operate.

Kalrez® perfluoroelastomer parts

Kalrez® seals are sold in multiple performance grades, many of which are relevant to the aerospace industry resulting from decades of R&D work. A non-exhaustive list of aerospace relevant grades of Kalrez® are as follows⁹²:

- Kalrez® 4079AMS was the first to be developed and gained AMS accreditation in 1985. This grade is rarely used in new designs but is still important for legacy parts where redesign of the component and qualification of a superior material is not necessary.
- Kalrez® Aerosel™ 7777 was developed as the next generation FFKM material to Kalrez® 4079. This grade meets AMS specifications, shows improved temperature resistance and is still manufactured and used in the design of new parts today. This grade is versatile and can be used in most oil seal applications.
- Kalrez® Aero seal™ 7797 has the same temperature resistance as Kalrez® 7777 and was developed as a seal material with greater hardness to meet specifications provided by aircraft engine manufacturers. This grade is therefore for use in applications with higher requirements for hardness and tensile strength but with less requirement for flexibility.
- Kalrez® Aerosel™ 7800 has similar temperature resistance to Kalrez® 7777, meets AMS specifications and demonstrates improved metallic corrosion properties.

Some of the key physical properties of these grades of Kalrez® are listed in Table 2. For Vespel® and Kalrez® see section 5 for the associated hazard properties.

Table 2: Key physical properties of Kalrez® grades for oil seals in aerospace

Property	Kalrez® 4079AMS	Kalrez® Aeroseal™ 7777	Kalrez® Aeroseal™ 7797	Kalrez® Aeroseal™ 7800
Hardness, Shore (A)	75	75	90	75
50% Modulus (Mpa)	n/d	n/d	15.91	n/d
100% Modulus (Mpa)	7.24	7.58	n/d	11.3
Tensile strength at break (Mpa)	16.88	17.91	23.84	20.1
Elongation at break (%)	150	160	77	150
Compression Set (204°C) (%)	25	15	11	20
Compression Set (300°C) (%)	n/d	19		52
Compression Set (325°C) (%)	n/d	34	n/d	n/d
Maximum Service Temperature (°C)	316	325	325	325
Temperature of Retraction (°C)	-2	-4	-5	-3

Source: Kalrez® technical datasheets

The aerospace industry is governed by multiple standards across many different countries and continents. Aerospace manufacturing processes in the EU are regulated by the European Union Aviation Safety Agency (EASA) and must conform to the:

- Implementing Rules for the Airworthiness and Environmental Certification of aircraft and related products¹⁰⁰ and
- Commission Regulation¹⁰¹ on the continuing airworthiness of aircraft and aeronautical products, parts and appliances, and on the approval of organisation and personnel involved in these tasks.

Aircraft typically have design specifications that are frozen for many decades (the manufacturing lifespan of the aircraft model) **and that must go through strict protocols to be amended.** These changes must be certified and approved by OEMs, design owners, and by governing aerospace agencies. This is due to aircraft flying all over the globe and operating in different jurisdictions in which they must be maintained, manufactured, and assembled to common approved standards across countries. Several grades of Vespel® must meet ASTM D6456-10¹⁰² and SAE Aerospace Material Specifications (AMS) 3644G¹⁰³ standards. These standards are specific to polyimide parts. In addition, there are many customer and industry standards and specifications relevant for different applications or materials used within an aircraft, all of which contribute to the airworthiness of an aircraft. Both for Vespel® parts and shapes as well as Kalrez® perfluoroelastomer parts, Internal Traffic in Arms Regulations (ITAR) limit how much information may be shared in public forums.

¹⁰⁰ (EU) No 748/2012. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1473415871666&uri=CELEX%3A32012R0748> (Accessed in June 2023).

¹⁰¹ Commission Regulation (EU) No 593/2012 of 5 July 2012 amending Regulation (EC) No 2042/2003. Available at: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32012R0593> (Accessed in June 2023).

¹⁰² Standard specification for finished parts made from polyimide resins. Available at: <https://www.astm.org/d6456-10r18.html> (Accessed in June 2023).

¹⁰³ SAE International, 2023. Plastic: Polyimide for moulded rod, bar, and tube, plaque, and formed parts. Available at: <https://www.sae.org/standards/content/ams3644g/> (Accessed in June 2023).

All aerospace components, including wear strips and 6FTA/6FDA resins, need to meet both internal and external expectations on suitability while complying with all aforementioned standards.

3.3.5. Military and defense and their use of Vespe[®] parts and shapes and Kalrez[®] perfluoroelastomer parts

Military and defence applications include air, space, land, and marine technologies. These include but are not limited to aircraft, tanks, submarines, naval ships, and amphibious and land vehicles. The applications are confidential but key requirements include strength, coefficient of friction, electrical resistivity, chemical resistivity, dimensional stability, thermal stability.

Ursula von der Leyen, President of the European Commission, has stated in May 2022: *"The EU is stepping up its effort to build a stronger European defence industry. We need to spend more on defence and we need to do it in a coordinated way"*.¹⁰⁴ **After years of underinvestment compared to other continents, EU Member States have increased their defence budgets to an additional 200 billion EUR in the upcoming years.** This is reflecting the need and further stressed importance of European defence policies. Aggregately, European countries have spent over 235 billion EUR on their military policies in 2021, corresponding to 1.5% of the aggregate GDP.^{105, 106}

EU countries are a significant contributor to NATO's military budget. **For 2023, out of NATO's total military budget of 1.96 billion EUR, 65.5% originated from EU member states.**¹⁰⁷ This highlights the EU's importance for military and defence policies, both at a national level, but also from a global perspective.

3.4. Overview of the supply chains of Vespe[®] parts and shapes and Kalrez[®] perfluoroelastomer parts

The supply chain associated with Vespe[®] parts and shapes and Kalrez[®] perfluoroelastomer parts comprises several key participants. **DuPont plays multiple roles in the supply chain as a polymer producer (FFKM only), formulator, article manufacturer, and supplier.** Professional machine shops are involved in the production process for some products. Distributors play a role in the distribution and logistics of these Vespe[®] parts and shapes and Kalrez[®] perfluoroelastomer parts. Original equipment manufacturers (OEMs) incorporate Vespe[®] parts and shapes and Kalrez[®] perfluoroelastomer parts into their components.

DuPont supply chain

The figure below highlights the steps in the typical supply chain for Kalrez[®] perfluoroelastomer parts and the steps performed by DuPont. This vertical integration across the supply chain enables complete

¹⁰⁴ European Commission, 2023. EU steps up action to strengthen EU defence capabilities, industrial and technological base: Towards an EU framework for a joint defence procurement. Available at: https://ec.europa.eu/commission/presscorner/detail/en/IP_22_3143 (Accessed in August 2023).

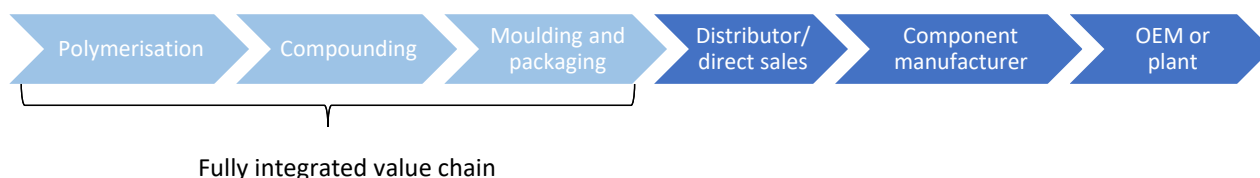
¹⁰⁵ The World Bank, Military expenditure <https://data.worldbank.org/indicator/MS.MIL.XPND.CD?locations=EU>

¹⁰⁶ Rounded value of ECB exchange rate on 16 August 2023 (EUR 1 = USD 1.09) based on 257.1 billion USD.

¹⁰⁷ Available at: <https://www.aljazeera.com/news/2023/2/15/infographic-how-much-have-nato-members-spent-on-ukraine#:~:text=NATO's%202023%20budget&text=For%202023%2C%20the%20military%20budget,percent%20of%20the%20alliance's%20funds>. (Accessed in August 2023).

product control, traceability, sustainability, and structural cost advantages. It permits DuPont to embrace new methods, innovation, and R&D to advance products and solutions and to facilitate its commitment to sustainable and ethical sourcing of raw materials in the manufacturing of Kalrez® perfluoroelastomer parts for highly demanding industrial operating environments. The typical supply chain for DuPont is as follows:

Figure 17: Typical Kalrez® perfluoroelastomer parts supply chain.

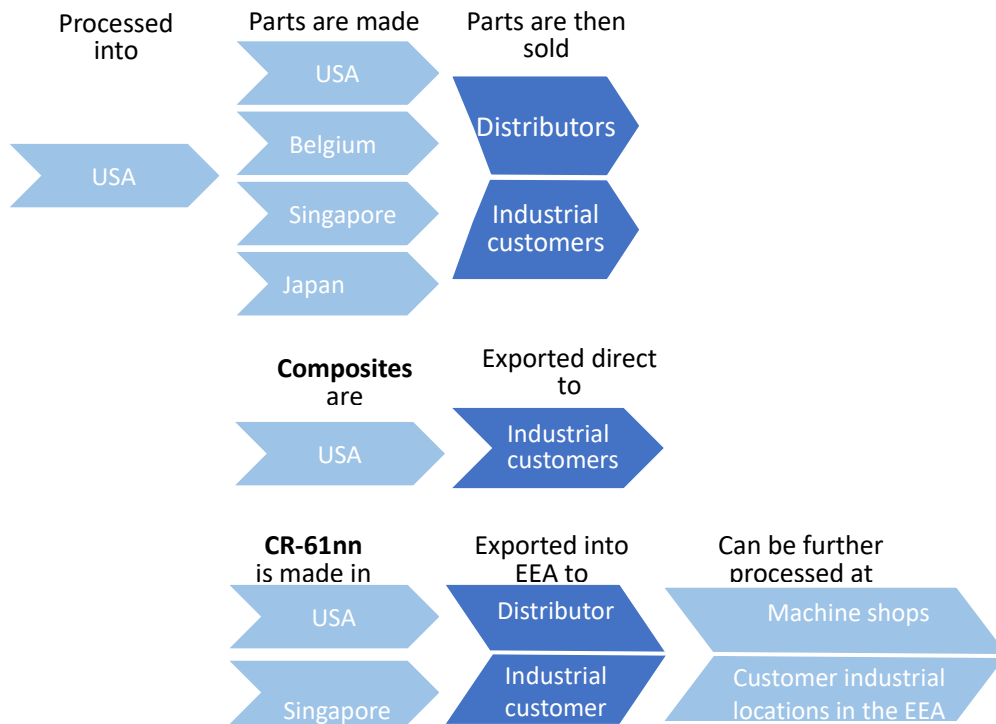


Source: Based on Dupont's internal data.¹⁰⁸

- **Raw materials (including PFAS) are sourced from the EU and from around the world.** DuPont is committed to sourcing these materials from ethical and responsible suppliers and has developed a supplier code of conduct to ensure that the suppliers meet DuPont's standards.
- **Kalrez® perfluoroelastomer parts: The raw materials are then processed** into active materials that are used in the perfluoroelastomer parts manufacturing process. The manufacturing of Kalrez® perfluoroelastomer parts takes place outside the EU. **Kalrez® parts are then sold to the final customers via trade channels** (i.e., distributors and/or retailers). **These distributors and retailers subsequently distribute the finished parts to component manufacturers across the EEA, who then ultimately sell them to OEMs or plants.** DuPont's customer base typically consists of distributors and OEMs who rely on DuPont's products and services. In the EEA, customers (channel partners or OEM) import Kalrez® materials.
 - In contrast to other FKM or general FFKM seal supply chains, **DuPont's Kalrez® perfluoroelastomer parts supply chains are, as noted above, fully integrated, including the polymerisation, compounding, moulding, and packaging stages.** There is also a high-performance network of distribution partners.
- **Vespel® parts and shapes:** The raw materials for the S polyimide product line are processed into resin in the USA. Parts are then made from that resin in USA, Mechelen (Belgium), Singapore or Japan. Parts are sold either via distributors or direct to industrial customers who can use it as is or further machine it. DuPont's Vespel® composites are made in the USA and exported direct to industrial/transportation/aerospace customers. Further machining can be done at customer industrial locations within the EEA. CR-61nn is made in the USA and Singapore and is exported into EEA to a distributor or industrial customer from one of those sites. It can be further processed at machine shops or customer industrial locations in the EEA.

¹⁰⁸ DuPont, 2023. Kalrez perfluoroelastomer parts and elastomers basics – value chain comparison

Figure 18: Typical Vespel® raw materials for the S polyimide product line.



Source: DuPont, 2023

4. ANALYSIS OF ALTERNATIVES

4.1. Aim, scope, and methodology

This section provides a closer look at the **use, function, and requirements** of PFAS in Kalrez® perfluoroelastomer parts and Vespel® parts and shapes that are used in highly demanding industrial operating environments. It outlines the available alternatives and the technical obstacles that prevent substitution, before exploring the challenges related to the development process of new substances. The analysis of alternatives concludes that **there are no suitable alternatives** for these PFAS.

4.2. Kalrez® perfluoroelastomer parts

This section will provide an overview of the key function and technical performance that the current selection of PFAS offers and what specific properties are required by the demanding industrial operating environments. Moreover, this section will create an overview of the current identified known potential alternatives to PFAS and why they are not a suitable alternative.

4.2.1. Function and technical performance of Kalrez® perfluoroelastomer parts and technical criteria for evaluating alternatives

Fluoropolymers used in Kalrez® (FFKM) perfluoroelastomer parts, include FFKM, FKM, PFA, and PTFE micropowder, are used in elastomeric sealing elements that are an integral, indispensable part of seals for exploration, production and refining processes in the oil and gas, chemical processing including pharmaceutical manufacturing, aerospace, and semiconductor manufacturing. These industries require seals that can withstand harsh environmental conditions, including extreme temperatures and high pressures as well as resistance to a large set of chemicals. **The versatility of Kalrez® perfluoroelastomer parts enables tailored designs that precisely meet specific sealing requirements, ensuring optimal performance and reliability.**

In complex systems and equipment like those found in semiconductor manufacturing, oil and gas, aerospace, and chemical processing, routine inspection by disassembling the entire equipment is impractical and challenging, and it also always involves managing these processes well in order to avoid dangers to workers as well as to the environment. **Therefore, it becomes vital for the sealing components to exhibit prolonged operational durability without the risk of failure.** Kalrez® perfluoroelastomer parts are purposefully engineered for high-temperature scenarios in harsh environments, often serving as the only viable solution for safeguarding critical components that, if compromised, could result in catastrophic failures.

It is crucial to recognize the potential consequences of substituting Kalrez® perfluoroelastomer parts with inferior sealing materials. Such a substitution could lead to sudden failures, directly impacting the safety of employees working in these industrial operating environments. Moreover, it could jeopardize the safety of the environment as well as society as a whole in the event of a major catastrophe. **Therefore, the performance and reliability of Kalrez® perfluoroelastomer parts play a crucial role in ensuring the safety of individuals and the robustness of the overall industrial infrastructure.**

Kalrez® perfluoroelastomer parts are engineered to provide more stability, more resistance, and more effective sealing. Aside from their cleanliness and purity, Kalrez® parts are engineered to be one of the most inert polymer structures available, standing up to more than 1,800 different chemicals while offering high-temperature stability.

Perfluoroelastomer materials offer:

- Higher temperature capability versus other elastomers
- Very broad chemical compatibility versus limited capabilities by other elastomers
- Low compression set, resulting in improved seal life.

Aerospace Industry

Perfluoroelastomer (FFKM) sealing elements stand up against jet fuel, engine lubrication oils, hydraulic fluids, and rocket propellants and oxidizers—all at extreme temperatures. The long-term, proven performance of perfluoroelastomers can mean less frequent seal changes, repairs, and inspections which decreases worker exposure to hazardous materials, and increases process and equipment uptime for greater productivity and yield. As an example, the increase in gas turbine temperature has improved engine efficiency by 40% over the years resulting in lower emissions. There are no alternatives to fluoropolymers that offer the combined properties of maintaining seal integrity, long seal life, broad chemical resistance, and high temperature stability up to 327 °C.

Semiconductor Manufacturing Industry

Contamination Considerations - Reducing contamination from particles, metallic contaminants and outgassing caused by seal deterioration is the major goal of semiconductor fabricators. Perfluoroelastomers (FFKMs) are used in deposition processes due to their extraordinary chemical resistance and thermal stability. Despite these qualities, FFKM performance can vary depending upon their chemical composition. Specially formulated products, such as DuPont™ Kalrez® 9100, are designed to help reduce the potential for contamination while maintaining sealing functionality in aggressive plasma environments.

Plasma Resistance

Plasma is a powerful tool for etching, cleaning, deposition, etc. Fluorine-containing plasmas, e.g., NF_3 and CF_4 , are used for deposition process chamber cleaning due to their high reactivity towards materials to be removed. Since all materials are consumed in plasma, seals need to withstand plasma attack, i.e., exhibit low weight loss (erosion) and leave minimal particles behind after being etched. Plasma attack can be chemical (seal exposed to radicals), physical (seal subjected to ion bombardment) or both. In most seal locations on wafer processing equipment, the plasma attack mechanism is mainly chemical. FFKMs exhibit better resistance to such environments versus other elastomeric materials.

Chemical Process Industry

Kalrez® Spectrum™ 6375 is a carbon black-filled product for general use in O-rings, seals, diaphragms and other parts specifically for the chemical process industry. This product has excellent broad chemical resistance, good mechanical properties, and outstanding hot-air aging properties. It is designed to give outstanding performance to the widest possible range of chemicals and temperatures. Mixed streams, once a problem for many chemical processors, can now be handled.

Furthermore, the curing system also allows for a maximum service temperature of 275°C (525°F) which translates to increased chemical resistance over all temperature ranges, especially if high temperature process excursions occur. This combination of chemical and thermal resistance provides advantages for chemical processors. Kalrez® Spectrum™ 6375 is well suited for use in mixed process streams because of its excellent resistance to acids, bases, and amines. It is also recommended for use in hot water, steam, pure ethylene oxide, and propylene oxide.

Oil and Gas Industry

Ball valves are primarily used for shut-off applications in the energy industry and must function in a wide range of chemical environments, both gas and liquid, where significant performance differences are often observed between various types of sealing materials. Kalrez® 0090 O-rings are TOTAL and NORSOK^{109, 110} compliant with exceptional chemical resistance and Rapid Gas Decompression performance making them an excellent choice for refinery ball valve applications. Thanks to the exceptional chemical resistance and outstanding RGD performance, these o-rings exhibit very little or no seal degradation. They reduced additional maintenance and associated shutdowns while increasing reliability and safety.

According to DuPont's case study on natural gas sampling and delivery, the transportation of natural gas through pipelines poses challenges due to the accumulation of contaminants, such as moisture, sulfur, and chemicals during the journey. To ensure the purity and energy content of the gas, samples are taken at various points in the pipeline using the GENIE® Probe Regulator™ (GPR™) developed by A+ Corporation. The GPR™ utilizes Kalrez® Spectrum™ 6375 O-rings to provide a reliable and tight seal. These O-rings are chemically inert and capable of withstanding the harsh chemical environment present in the pipeline. The foot valve of the GPR™, where the O-ring is located, controls the entry of gas into the probe and prevents liquid contaminants from entering the sampling system. The Kalrez® O-rings have demonstrated superior performance and compatibility, expanding the applications of the GPR™ beyond natural gas pipeline usage. Kalrez® Spectrum™ perfluoroelastomer parts are designed to resist aggressive chemicals commonly encountered in natural gas and hydrocarbon processes. These parts offer excellent chemical resistance and sealing properties, making them suitable for demanding environments.

A summarizing overview of the specific functionality and properties of Kalrez® perfluoroelastomer parts, tailored to high demanding industrial operating environments, is presented in Table 3 below.

¹⁰⁹ Kalrez® 0090 perfluoroelastomer parts shows the highest TOTAL GS EP PVV 142 (Rev.5) certification rating and is therefore TOTAL qualified. In the test, the material was tested in its resistance to rapid gas decompression or explosion decompression concerning O-rings used in industrial valve industry. Source: <https://o-ring.info/catalog/datasheets/kalrez-0090/kalrez-0090.pdf>.

¹¹⁰ NORSOK is a series of standards developed by the Norwegian petroleum industry for oil and gas companies. Their main objectives are to ensure safety, enhance value, and promote cost-effectiveness in petroleum industry developments and operations. These standards are designed to replace individual oil company specifications and also serve as reference points in governmental regulations.

Table 3: Functionality provided by Kalrez® perfluoroelastomer parts

Functionality provided by Kalrez® (FFKM)	Description
Chemical resistance and broad chemical compatibility	Kalrez® perfluoroelastomer parts are engineered to be one of the most inert polymer structures available, withstanding exposure to more than 1,800 different chemicals . The ability to withstand exposure to such a wide range of chemicals is of utmost importance for seals employed in demanding industrial environments where specific harsh oils and chemicals are frequently utilized. Moreover, they offer universal resistance to various types of chemicals, which possess different chemical compositions and can potentially interact differently with alternative sealing materials. In applications where seals are required to be in constant contact with chemical fluids throughout their service lifetime, it is crucial for the seals to exhibit strong chemical resistance without experiencing significant changes in their physical properties over extended periods of time. Kalrez® excels in this regard, demonstrating resistance to highly challenging materials such as e.g., oils, amines, brines, hydrogen sulfide, pure ethylene oxide, propylene oxide, jet fuel, engine lubrication oils, hydraulic fluids, rocket propellants, and oxidizers.
Highest temperature resistance and thermal stability	In industrial operating environments, temperature variations from -15 °C to 300 °C are common . Therefore, it is crucial for seals to exhibit high resistance to these temperatures over extended periods as a regular service temperature (i.e., not only as peak service temperature). It is key for a seal to be able to maintain the sealing integrity when exposed to temperature and/or pressure cycling. The excellent thermal stability of perfluoroelastomer allow to keep excellent elastic recovery. Depending on the specific grade employed, Kalrez® perfluoroelastomer parts can offer temperature resistance of up to 327 °C.
Durability	The extreme durability and capability of maintaining their form under extreme environments is a key property that make fluoropolymers and perfluoroelastomers so important in industrial operating environments. This point has also been reflected in the Annex XV report by the dossier submitters. ¹¹¹
Mechanical strength	The mechanical strength under extreme environments is a key property that make fluoropolymers and perfluoroelastomers so important in industrial operating environments. This point has also been reflected in the Annex XV report by the dossier submitters. ¹¹²
Corrosion resistance	It is of high importance that the seal is does not damage other equipment (hardware) in which the seal is housed and being compliant with the counter surface to maximize sealing efficiency to prevent seal leakage that may have severe consequences.
Plasma resistance	In semiconductor manufacturing, seals must withstand plasma attacks without experiencing weight loss or leaving behind significant particles after etching. Plasma, a powerful tool for processes like etching, cleaning, and deposition, utilizes reactive plasmas containing fluorine (e.g., NF ₃ and CF ₄) for chamber cleaning . Seals must endure plasma attacks by exhibiting minimal erosion (low weight loss) and particle generation. The attack can be chemical (seal exposed to radicals), physical (seal bombarded by ions), or a combination of both. FFKM demonstrate superior resistance to such environments compared to other elastomeric materials, making them most suitable for e.g., seal applications in wafer processing equipment.

¹¹¹ Annex A to the restriction report, version 2 (22 March 2023), p. 148.

¹¹² Annex A to the restriction report, version 2 (22 March 2023), p. 148.

Low outgassing properties	Semiconductor fabricators aim to minimize contamination caused by seal deterioration, including particles, metallic contaminants, and outgassing.
Rapid gas decompression resistance	Kalrez® perfluoroelastomer parts exhibit no or little seal degradation when being formulated to have resistance to RGD Rapid Gas Decompression. This is highly important in the energy and oil and gas industry.

Source: Downstream user consultation performed by RPA (2023)¹¹³

In summary, the technical criteria for evaluating alternatives to Kalrez® perfluoroelastomer parts in terms of their suitability for the given applications in the transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, and energy sectors include:

- **Chemical Resistance:** The alternative material should exhibit minimal swelling or degradation when exposed to aggressive reagents. It should maintain its integrity and functionality in the presence of various chemicals.
- **Thermal Stability:** The material should have the ability to withstand high service temperatures exceeding 250°C without significant degradation or loss of performance.
- **Outgassing:** In the context of semiconductor manufacturing, the alternative should have low outgassing properties. This means it should release minimal contaminants or impurities that could interfere with the semiconductor fabrication process.
- **Plasma Resistance:** Given the requirements of semiconductor manufacturing, the material should possess resistance to plasma. It should be able to withstand the effects of plasma without degradation or damage to its properties.
- **Rapid Gas Decompression:** For applications in the oil and gas industry, particularly in relation to safety standards like NORSOK M-710, the alternative material should be capable of withstanding rapid gas decompression. This ensures the material remains intact and prevents failures or safety hazards in such environments.
- **Further criteria** that are of relevance in certain applications are UV resistance, water moisture resistance as well as a low compression set and compression stress relaxation.

All of these criteria should be met over extended time periods to provide a safe extended service life span.

¹¹³ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

FFKM's unique chemistry is characterized by high-temperature resistance and stability resulting from the C-F bonds present in the material. Industries utilize FFKM as a sealing material particularly for high-temperature applications, in many cases combined with the other criteria listed above. **Therefore, any alternative material must demonstrate equal or superior performance and functionality compared to FFKM to be considered.** In order to be considered a technically feasible alternative, the material should show equal or greater performance in both chemical and thermal resistance. The extreme durability and capability of maintaining their form and mechanical strength as well as the corrosion resistance under extreme environments (e.g., found in down hole drilling, chemical processing industry, semiconductor manufacturing) are therefore the key properties that make fluoropolymers and perfluoroelastomers so important in industry. This point has also been reflected in the Annex XV report by the dossier submitters.

Kalrez® perfluoroelastomer parts are used in critical applications such as semiconductor fabrication equipment, oil field equipment, chemical processing industry and airplane engines. These devices require an elastomeric seal that is able to withstand the environmental conditions of the application, including, media, temperature, pressure, speed, and abrasion, while also not damaging other equipment (hardware) in which the seal is housed and being compliant with the counter surface to maximize sealing efficiency to prevent seal leakage, fugitive emissions or total seal failure. DuPont™ Kalrez® elastomeric seals are used in applications requiring high temperature and/or chemical resistance and are often the only solution for critical components that could result in catastrophic failures.

The next section will provide an assessment of alternatives to Kalrez® (FFKM) perfluoroelastomer parts.

4.2.2. Alternatives to FFKM

Alternatives do not exist to FFKM at this time. This section will provide an overview of the potential identified known alternatives to FFKM.

A general overview of potential alternatives to FFKM

Before analysing specific alternatives to FFKM, this section will provide a general overview of the potential materials that may potentially be an alternative to FFKM. From this broad approach, this section will be narrowed down on more specific potential alternatives.

Elastomers for the oil and gas, chemical processing and semiconductors sectors must have chemical resistance to substances such as oil, hot water, brines, amine and H₂S, as well as heat, which – according to the widely accepted ASTM D2000 chart - **only permits NBR, HNBR (in applications until 150 °C), FKM and FFKM** (see Figure 19 below).

However, as the resistance of FKM to amines (used as corrosion inhibitors)¹¹⁴ and hydrogen sulfide (H₂S) is limited, there are certain applications in the oil and gas sector above 150 °C that only leave

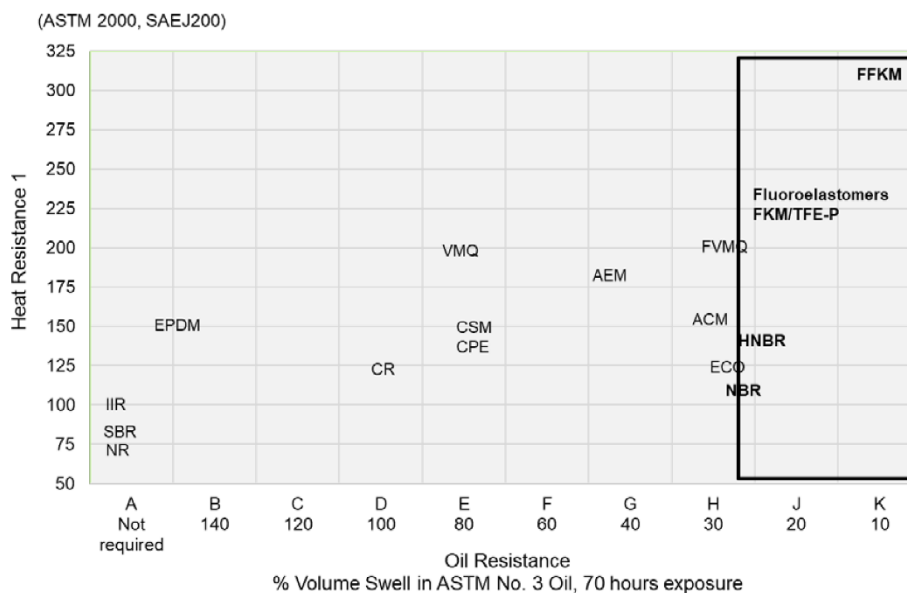
¹¹⁴ SAE Technical Paper 2003-01-3029, 2003, <https://10.4271/2003-01-3029>.

FFKM as a technically possible solution under extreme conditions. Moreover, according to AMS7257¹¹⁵, the maximum volume swell for oil seals is 0 to +5%. This criterion can effectively eliminate all other sealing materials shown in Figure 19 including FKM.

In chemical processing industries, equipment is typically equipped with EPDM, NBR, and HNBR elastomers. Only when these non-PFAS elastomers are lacking the required temperature and/or chemical resistance, are elastomers such as FKM or FFKM used. FFKM is used when other solutions do not provide the required performance in the application.

In semiconductor manufacturing, FFKM is used due to the requirements for combination of temperature resistance, plasma resistance, and low outgassing. Silicone rubber (VMQ) is described later in this document.

Figure 19: Oil and heat resistance comparisons to various polymer materials according to standards ASTM2000 and SAE J200.



¹ Maximum temps at which vulcanizates can be aged for 70 hours with changes in tensile strength $\leq \pm 30\%$, elongation $\leq -50\%$ and hardness $\leq \pm 15$ points

Source: Based on DuPont's internal data, 2022. see next section for further information on the materials

¹¹⁵ SAE, 2014. Perfluorocarbon (FFKM) Engine oil, fuel, and hydraulic fluid resistant 70 to 80 hardness for high temperature seals in engine oil systems, fuel systems, and hydraulic systems. Available at: <https://www.sae.org/standards/content/ams7257e/> (Accessed in July 2023).

It should be noted that **FFKM is only used where absolutely necessary and the conditions do not allow any other material**. This is because perfluoroelastomers are substantially (factor 10x vs closest elastomer) more expensive than alternative materials; therefore, they are only purchased for applications where no other elastomeric material can withstand the chemical and temperature environment. Figure 20 below also highlights the price bands for high performance elastomers, showing the relative high price in euro/kg of FFKM. Substitution of FFKM therefore naturally takes place due to economic considerations alone where technically possible. This point has specifically been acknowledged by the dossier submitters.¹¹⁶ **Given the relative high cost of FFKM, in applications where FFKM are used, the next-best alternative has already been tested against the performance requirements for temperature resistance, plasma chemical resistance, and chemical resistance limited oil swell and deemed inappropriate for the specific application.**

Figure 20: Price bands for high performance elastomers.

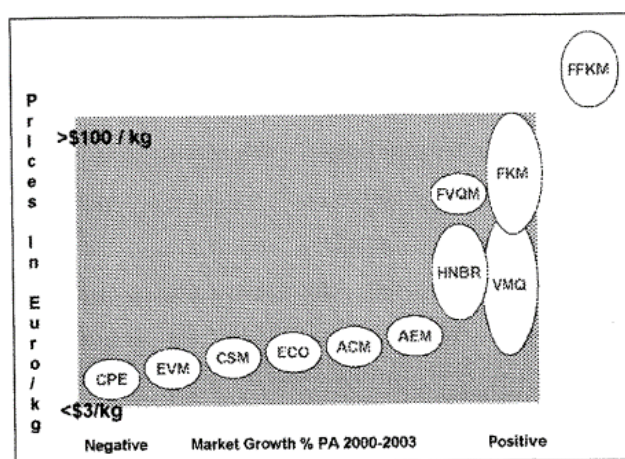


Chart 10
Price bands for high performance elastomers
(Source: Compilation of Industry Data)

Source: This is a copy paste of Chart 10 in Beswick (2000)¹¹⁷

To illustrate how chemical resistance can vary, Table 4 below presents an overview of all chemical substances and elastomer resistance to the particular chemical.¹¹⁸ On all aspects, FFKM outperforms alternatives, demonstrating the limitations of potential alternatives.

¹¹⁶ Annex E to the restriction report, version 2 (22 March 2023), p. 498-499.

¹¹⁷ Beswick, R., 2000. An overview of the high-performance elastomer industry. High performance elastomers 2000 (Berlin, 10-11 October 2000).

¹¹⁸ DuPont, 2023. Kalrez® perfluoroelastomer parts chemical resistance. Available at: <https://www.dupont.co.uk/knowledge/chemical-resistance-kalrez-parts.html> (Accessed in July 2023).

Table 4: Comparison of chemical resistance ratings of various O-ring materials to different chemicals.

	Perfluoro-elastomer (FFKM)	Fluoroelastomer (FKM)	Fluorosilicone (FVMQ)	Neoprene (CR)	Buna-N Nitrile (NBR)	Ethylene Propylene (EPDM)
Hardness durometer	65 to 95	55 to 95	40 to 80	30 to 95	40 to 95	40 to 90
Tensile strength	2,000	2,500	800	3,000	2,500	2,500
Wear resistance	**	**	Not recommended	**	**	**
Fireproof hydraulic fluids	****	*	***	*	Not recommended	***
Lubricating oils	****	****	****	**	**	Not recommended
Fuel oils	****	****	****	*	**	Not recommended
Hydraulic oils	****	****	****	**	****	Not recommended
Petrol (normal)	****	****	****	*	***	Not recommended
Petrol (high-octane)	****	****	****	Not recommended	**	Not recommended
Kerosene	****	****	****	*	***	Not recommended
Aromatic hydrocarbons	****	****	***	Not recommended	*	Not recommended
Aliphatic hydrocarbons	****	****	****	**	***	Not recommended
Alcohols	****	****	****	****	***	****
Ketones	****	Not recommended	Not recommended	Not recommended	Not recommended	**
Concentrated acids	****	***	**	Not recommended	Not recommended	*
Diluted acids	****	****	**	**	*	**
Alkalis	****	Not recommended	*	**	*	***
Flame resistant	Yes	Yes	No	Yes	No	No

Source: DuPont and industry sources.¹¹⁹

Note: 4 stars = Excellent, 3 stars = Very good, 2 stars = Good, 1 star = Reasonable.

¹¹⁹ DuPont, 2023. Kalrez® perfluoroelastomer parts chemical resistance. Available at: <https://www.dupont.co.uk/knowledge/chemical-resistance-kalrez-parts.html> (Accessed in July 2023).

To illustrate the difference in performance regarding temperature resistance even more elaborately, Table 5 below offers a comparison of temperature resistance ratings of various O-ring materials. Based on the temperature resistance required to be successful in high demanding industrial operating environments, it can be assumed that all these alternatives would be inadequate in terms of their technical performance.

Table 5: Comparison of temperature resistance ratings of various O-ring materials

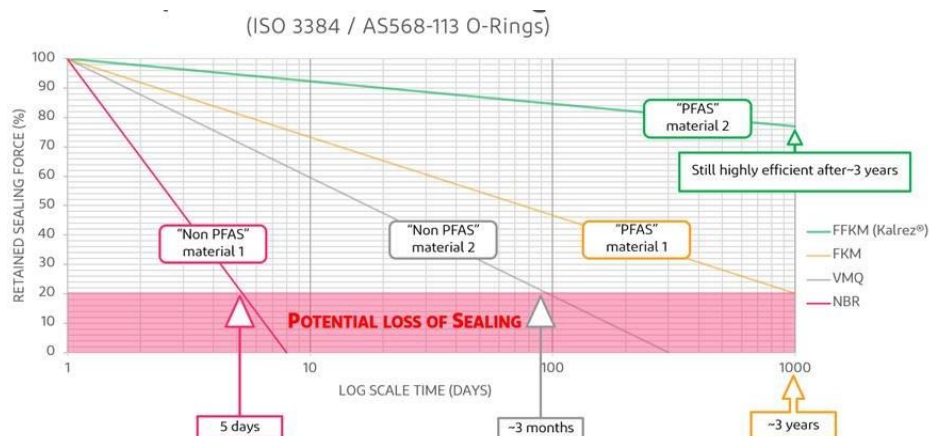
Material	Temperature resistance
Kalrez® (FFKM)	Up to 327 °C
Nitrile (NBR/HNBR)	Up to 120 °C/150 °C
Ethylene propylene diene terpolymer (EPDM)	Up to 149 °C
Silicone (VMQ)	Up to 230 °C
Fluorosilicone (FVMQ)	Up to 200 °C
Fluoroelastomer (FKM)	Up to 230 °C
Polysulfide (T)	Up to 120 °C

Source: DuPont consultation

While PFAS alternatives such as other FFKM grades or FKM may in certain cases offer similar heat and chemical resistance, they **lack the same level of resilience, resulting in significantly shorter seal life**. This poses risks and health hazards due to equipment failure. Although alternatives generally come at lower costs, it is important to consider the heightened health hazards and risks associated with equipment failures. These alternatives exhibit significantly lower temperature and chemical resistance, leading to increased environmental hazards and risks due to fugitive emissions.

Figure 21 below provides a specific example for O-Rings. Non-PFAS alternatives significantly reduce the sealing potential of O-rings. Switching to alternatives therefore increases the wear and tear of this application. PFAS materials, notably FFKM (, are highly efficient for a longer duration. **A decrease in sealing potential results in a lowered technical performance and may consequentially lead to equipment failures.**

Figure 21: Compression stress relaxation test in -150 °C air.



Source: Based on DuPont's internal data, 2023

Structural failure in high-demanding applications can lead to potentially catastrophic consequences for both the environment and human health. This is why these industries are committed to always using high performing materials that avoid leakages to the best possible extent. It is therefore important to make sure that the use of alternative materials with lower levels of functional performance are not detrimental to the safety of the workers operating facilities, as well as to the surrounding environment.

Please note that FKM and FVMQ are considered PFAS and are therefore within the scope of the proposed restriction, making them unsuitable alternatives, as these too would be restricted. Therefore, from here on, the analysis of alternatives will only focus on non-PFAS materials that are therefore not in scope of the restriction.

Hydrogenated Nitrile Butadiene Rubber (HNBR)

HNBR is a synthetic elastomer that is created by hydrogenating nitrile butadiene rubber (NBR). The material is versatile and used in many industries for its resistance to heat, chemicals, oil, and abrasion, while maintaining its strength. As illustrated in Figure 21, selection of a non-PFAS material requires a concession in performance. Out of all potential non-PFAS alternatives, HNBR shows a similar level of oil resistance compared to FFKM. Nevertheless, it still shows approximately 35% volume swell after exposure to oil for 70 hours. The maximum percentage of volume swell acceptable for oil seals is 5%. **Therefore, even though HNBR outperforms other non-PFAS materials in oil resistance, it would still not be able to deliver the appropriate sealing function that is required in high demanding industrial operating environments.**

Additionally, where FFKM offers temperature resistance up to 327 °C, the temperature resistance of HNBR is significantly lower, at 150 °C. HNBR is not technically feasible to be used in operating at temperatures above 150 °C **and does not have the full chemical resistance performance of FFKM.** The system will have to be redesigned if the thermal exposure is greater than 150 °C resulting in much more significant cost or complete work stoppage of up to 150°C.¹²⁰ Moreover, in industrial operating environments under 150°C, HNBR seals would deteriorate or at an accelerated rate, resulting in a lifespan significantly shorter than 1,000 hours. **Therefore, more frequent maintenance, repair, and operational activities would be necessary.** This lack of technical performance and replacement is both impractical and unsafe and not desirable in harsh operating environments.

HNBR is a mid-performance material compared to FFKM and is available at a lower cost. Where possible, HNBR already being used as O-rings and seals in some less technically demanding applications; therefore, it is assumed that these materials will be available in sufficient supply to replace FFKM seals. However, the use of an inferior material in terms of lower temperature and oil resistance would require the redesign of parts and systems to allow a new material to ensure compatibility with the surrounding assembly system. This would present a large investment in time and cost. **In addition, the volume swell and lower temperature resistance would require system redesign, imposing significant costs on the original equipment manufacturers. Even at slightly**

¹²⁰ RadoRubber, 2023. Hydrogenated NBR elastomer. Available at: <https://www.rado-rubber.com/specialities/hnbr/> (Accessed in July 2023).

elevated temperatures or with non-oil solvents, volume swell of O-rings requires them to be replaced even after several days of use. This lack of technical performance and replacement is both impractical and unsafe and not desirable in harsh operating environments.

Comparing all the aspects of temperature resistance, chemical resistance, and economic feasibility, an overview of the conclusion of the assessment of HNBR is summarised in Table 6 below. It may be concluded that whereas HNBR may be a feasible alternative in applications with less demanding temperature and oil resistance requirements, it does not reach the performance of FFKM that is required by demanding industrial operating environments.

Table 6: Summary of technical and economic feasibility of using HNBR as an alternative

	HNBR
Oil resistance	Compared to FFKM, HNBR shows a similar level of oil resistance. Nevertheless, it shows approximately 35% volume swell after exposure to oil for 70 hours, well exceeding the maximum percentage of volume swell acceptable for oil seals.
Temperature resistance	FFKM offers a temperature resistance up to 327 °C, whereas the temperature resistance of fully hydrogenated HNBR is 150 °C (maintaining its sealing capabilities for a max. of 1000 hours), which would result in rapid failure in demanding industrial operating environments.
Costs to implement	As HNBR is already being used as O-rings and seals in some less technically demanding applications, it is assumed that these materials will be available in sufficient supply to replace FFKM seals. Nevertheless, as seals should be replaced at more regular intervals, this may result in a loss of efficiency and overall additional costs to original equipment manufacturers. Alternatively, the system will have to be redesigned if the thermal exposure is greater than 150 °C resulting in much more significant cost or necessity to replace (if possible).

Source: RPA, 2023¹²¹

Silicone (VMQ)

Silicone rubber (VMQ) is a type of synthetic elastomer. The term silicone often refers to a group of polymers. These silicones possess rubber-like characteristics, exhibit resistance to heat, are non-reactive, and resistant to harsh conditions. Some grades of silicone rubber are already used in seals in demanding environments. VMQ is the most thermally resistant non-PFAS substance, as shown in Figure 19.

VMQ can withstand temperatures up to 200 °C, which is lower than the temperature resistance of FFKM, which is capable of withstanding up to 327 °C. However, VMQ has a tendency to swell when exposed to oil, resulting in an 80% increase in volume after 70 hours of oil exposure. Up to 150 °C, VMQ maintains its physical properties without any loss in quality. **Beyond 200°C, its performance deteriorates, limiting its operational lifespan to approximately 10,000 hours.**¹²² Nevertheless, silicone rubbers remain elastic even at temperatures as low as -70 °C. Therefore, while VMQ may not

¹²¹ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

¹²² Shin-Etsu Silicone, 2020. Characteristic properties of silicone rubber compounds. Available at: https://www.shinetsusilicone-global.com/catalog/pdf/rubber_e.pdf (Accessed in July 2023).

be suitable for high-temperature industrial environments, it could potentially be used in very cold processes and geographies **Conversely, in high-temperature industrial environments exceeding 200°C, VMQ seals would deteriorate rapidly or even completely, necessitating more frequent maintenance, repairs, and operational activities. Both the practical and safety aspect of this is highly fundamental.**

Silicone rubbers demonstrate poor performance in comparison to FFKM when exposed to oils, petrol, and similar solvents. As depicted in Figure 19 in particular, they are highly prone to swelling, exceeding the acceptable volume swell limit of 5% specified in AMS7257. This swelling would render a VMQ sealing system ineffective in containing essential oils and fluids required for demanding industrial operations, potentially leading to severe consequences if the system were to leak. **VMQ does not meet the essential technical performance requirement of resistance to oil.**

Given that silicone rubbers are already being used as O-rings and seals in other applications, it is assumed that these materials will be available in sufficient quantities to replace FFKM. The use of an inferior material with lower temperature and oil resistance would necessitate redesigning components and systems to ensure compatibility. This would require significant investments in terms of time and cost, which may not be feasible for downstream users. **Furthermore, the substantial 70% increase in volume swell and decrease in performance in case of exposure to temperatures of 200°C. Importantly, beyond 200°C, VMQ would lead to more frequent replacement of the seals and complete deterioration of the seal. This is highly undesirable from a safety, practical, and economic perspective and would necessitate system redesign by the equipment manufacturers.**

Comparing all the aspects of temperature resistance, chemical resistance, and economic feasibility, an overview of the conclusion of the assessment of VMQ is summarised in Table 7 below. All in all, it may be concluded that whereas VMQ may be a feasible alternative in applications with less demanding temperature and oil resistance requirements, it does not reach the excellent performance of FFKM (Kalrez®) that is required by demanding industrial operating environments.

Table 7: Summary of technical and economic feasibility of using VMQ as an alternative

	VMQ
Oil resistance	VMQ's shows poor resistance to oil and large swell increase. This swelling would make a VMQ sealing system incapable of effectively and safely containing the essential oils and fluids required for operations in demanding industrial environments.
Temperature resistance	VMQ is often more suitable for low temperature applications or up to 200 °C, which is not high enough to replace FFKM with its temperature resistance up to 327 °C.
Costs to implement	Since silicone is already commercially feasible and being used in various applications, and to some extent in aerospace, its economic feasibility is similar to FFKM. Nevertheless, as seals should be replaced at more regular intervals, this may result in a loss of efficiency and overall additional costs to original equipment manufacturers. Or, the system will have to be redesigned if the thermal exposure is greater than 200 °C resulting in much more significant cost or complete work stoppage

Source: RPA, 2023¹²³

4.2.3. Typical innovation process and timing for Kalrez® perfluoroelastomer parts

For the past 50 years, there have been no new inventions or successful developments to replace FFKM.

It is important to consider the tolerance for emissions of toxic or dangerous materials into the environment. **This adds an additional challenge in finding alternatives that not only meet performance requirements but also have lower environmental impact.** A case study in a steam generator operating at 140°C (within EPDM range of temperature) demonstrated that replacing EPDM by FFKM led to a 5x improvement of the seal lifetime.

Another aspect is the use of polymerization aids for Kalrez® perfluoroelastomer parts. If a suitable alternative for the polymerization aid can even be found, the research and development (R&D) process for finding non-PFAS alternatives to this polymerization aid for Kalrez® perfluoroelastomer parts is expected to take at least 15 years.

As an example of a prior complex R&D process for the development of previous alternative fluorinated surfactants, spanned a period of 10 years and resulted in more than 40 million EUR developments costs. The R&D took 5 to 10 years, followed by internal qualification and subsequent evaluations by customers. The patent and replacement since the year 2000 of cut-off PFOA-based surfactants has led to no suitable hydrocarbon surfactant alternative so far.

In conclusion, there are no suitable alternatives to FFKM at this time. Research is underway for development of a non-fluorinated surfactant.

¹²³ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

4.3. Vespel® parts and shapes

This section will provide an overview of the key functions and technical performance of Vespel® parts and shapes and what specific properties are required by these demanding industrial operating environments. Moreover, this section will create an overview of the current identified known alternatives and why they are not suitable alternative for these applications.

4.3.1. Function and technical performance of PFAS in Vespel® parts and shapes and technical criteria for evaluating alternatives

Vespel® parts and shapes, including fluoropolymer ingredients like PTFE, PFA, and NR-150 Resin, are used as wear, friction, sealing, and light-weighting solutions in various high-demand industries. DuPont's Vespel® parts and shapes provide a unique combination of the physical properties common among engineered plastics, metals, and ceramics in a single material. These properties include proven performance when used continuously in air up to 300 °C and for short excursions to as high as 550 °C, low wear and friction at high pressures and velocities (lubricated or unlubricated), creep resistance, strength and impact resistance, chemical resistance, and machinability. **These properties make Vespel® crucial for use in challenging industrial applications, which require high stability along with durable, long-lasting properties.**

The primary role of Vespel® components in high demanding industrial operating environments is to reduce the impacts of vibration and wear on critical components. **A slow wear rate can be directly linked to the lifetime of a component, resulting in reduced maintenance, operating costs, and very importantly, improved safety.**

The versatility of Vespel® parts and shapes stems from the availability of different grades, each possessing its own distinctive characteristics achieved through various types and levels of fillers in combination with the PFAS materials used. This range of grades allows Vespel® parts and shapes to be tailored precisely to the specific demands and requirements of high-demanding industrial operating environments. Vespel® parts and shapes can be pre-formed and bonded to a specific geometry and can therefore minimize galling by preventing metal-on-metal components.

An overview of the specific functionality and properties of Vespel® parts and shapes, tailored to high demanding industrial operating environments, is presented in Table 8 below.

Table 8: Functionality provided by Vespel® parts and shapes

Functionality provided by Vespel®	Description
Chemical resistance	Chemical resistance is a critical property, playing a crucial role in safeguarding materials against degradation when exposed to various processes. It is particularly important to prevent any damage for example during de-icing or cleaning procedures applied to engines, aircraft wings, and assemblies. In these operations, it is vital that materials do not undergo chemical breakdown. Furthermore, there is a possibility of unintended interactions with fuels, lubrication oils, and greases, making chemical

	resistance a key requirement for ensuring the integrity of components in these industries.
Electrical resistance	The presence of a non-conductive material in demanding industrial operating environments is crucial to prevent any interference or disruption of electronic components within operating systems, which may arise from the release of particulates during service. Vespel® parts and shapes, with its non-conductive properties, effectively addresses this concern by minimizing the risk of electrical disturbances in these critical systems.
Prevention of galvanic corrosion	In certain applications, Vespel® parts and shapes can also serve as a protective barrier to inhibit galvanic corrosion between dissimilar metals, further enhancing the longevity and reliability of components in challenging operating conditions.
Vibration and wear resistance	There are many vibrating metal components in the oil and gas and transportation industries. Having a material in between these metal components not only reduces noise but reduces friction and wear rates, thus also increasing safety.
Thermal resistance	Vespel® parts have the ability to maintain performance levels when used continuously in air at temperatures >315°C and up to 370°C, and short excursions to as high as 550 °C. Thermal insulation capabilities in parts provided to the glass industry helps avoid defects caused by cold spots on glass. Vespel® parts and shapes offer insulator sleeves for plasma cutting torches to thermally insulate the plasma cutting torch tip.
Self-lubricating/low coefficient of friction	Oil-based lubricants typically face limitations when exposed to high temperatures, as they tend to burn up or evaporate under such conditions. Oil lubrication systems also perform poorly in dirty environments. Consequently, it becomes essential to utilize oil-free self-lubricating parts and components that possess a low coefficient of friction in applications involving motion in high temperature environments and/or dirty environments. The self-lubricating characteristics of PFAS contribute significantly to prolonging the lifespan of products. By eliminating the requirement for oil nipples and reducing friction and wear, PFAS-containing materials reduce weight, simplify engine design, and enhance durability. The properties of low wear and friction are particularly vital as they lead to decreased maintenance needs and reduced power consumption for mechanical components, as well as increased safety through reduced risk of failure.
Shear strength	In systems where relative motion is present, the shear strength and mechanical resistance of parts become crucial factors. Without adequate strength, the increased pressure and stress exerted on the components can lead to deformation and degradation over time. Therefore, it is imperative to ensure that the parts possess sufficient shear strength and mechanical resistance to withstand these dynamic forces and maintain their structural integrity in the long run.
Non-galling	The material should exhibit minimal friction and abrasion when it comes into contact with other surfaces. Excessive friction could lead to components getting stuck or debris being dislodged. Furthermore, the material should provide smooth wear characteristics and not impede sliding motion, irrespective of temperature variations. It should facilitate the transfer of material from one surface to another seamlessly across a wide temperature range.
Non-flammability and the absence of a melting point	The absence of a melting point materials is crucial, especially in high-stakes applications like aero engines, oil, gas and mining, as well as the automotive industry, where it plays a critical role in ensuring safety.
Low outgassing	Low outgassing properties are vital to prevent contamination of critical semiconductor manufacturing processes and minimize defects as described in chapter 3.2.

In summary, the technical criteria for evaluating alternatives to PFAS used in Vespel® parts and shapes in terms of their suitability for the given applications include:

- **Chemical resistance:** The alternative material should not undergo a chemical breakdown when exposed to aggressive reagents. It should maintain its integrity and functionality in the presence of various chemicals.
- **Self-lubricating properties:** The alternative material should have self-lubricating properties, which are highly important to minimize friction and wear between components, reducing the need for additional lubrication and extending the product's lifespan. Low wear/friction characteristics further contribute to reduced maintenance requirements and energy consumption.
- **Lightweighting:** The weight of the alternative material should be of consideration, particularly in industries such as transportation and aerospace where weight reduction is sought to enhance fuel efficiency and overall performance.
- **Low outgassing:** The alternative material should exhibit low outgassing. This is highly essential, particularly in sensitive manufacturing processes such as semiconductor production to prevent contamination and maintain the desired product quality.
- **Thermal insulation capabilities:** The resistance to heat transfer is highly valuable in various applications where temperature differentials need to be minimized or controlled. This property helps prevent issues like cold spots or heat transfer, contributing to the overall performance and reliability of the product.
- **Other performance criteria** include water/moisture resistance, electrical resistance, non-flammability, low coefficient of friction and thermal stability.

It is important that any material replacing the PFAS in Vespel® parts and shapes demonstrates equal or greater functionality in comparison to existing Vespel® formulations. It is of importance to emphasize the link between material performance and maintenance intervals. If there would be a reduction in performance in any of the above areas by using an inferior alternative to the PFAS, this would at least result in an increased activity of maintenance and repair activities. When parts wear faster, this puts them more at risk of catastrophic failure, which creates increased safety risks. The next section will provide an assessment of alternatives to the PFAS that are used in Vespel® products.

The following paragraphs describe in further detail the link between requirements in key sectors and the functional performance provided by Vespel® parts and shapes.

¹²⁴ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

Our assessment here focuses on function and technical performance of PFAS in Vespel® products related to transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, energy, and industrial manufacturing such as automotive manufacturing, textile, glass handling and industrial welding/plasma/cutting tools. The Vespel® family can be broken down into groups:

- Vespel® ISO Shapes: Available in rods, tubes, and blocks, these parts are formed under isostatic pressure ensuring uniform properties in all directions. These are typically the toughest of all forms. This process does not intentionally use PFAS. US government regulations prevent export of this manufacturing technology.
- Vespel® Plaque Shapes: Available as blocks, disks, and rings. These are hot moulded under pressure. Plaque Shapes: Physical properties are similar to ISO Shapes, but critical properties are anisotropic. Production rates are very low, making this form unsustainable for high volume applications such as the automotive market segment.
- Vespel® Direct Formed Parts: Available as net and near net shapes. This rapid form process is only available in small shapes, but the preform blanks require less machining than ISO or Plaque shapes. PTFE is required as a polymeric processing aid.
- Vespel® S resins are polyimide materials that can be formulated with or without lubricants to produce tough parts and shapes with excellent high temperature properties. These can be further classified into three product forms based on how the resin is processed.
- Vespel® SP-211 and SP-221 Parts and Shapes: Available in Direct Formed, Plaque, and ISO form, these shapes contain a maximum of 10wt% PTFE for superior static coefficient of friction.
- Vespel® CR (Chemical Resistance): Designed to perform in aggressive chemical environments, CR-6100 is a PFA composite. While not as thermally resistant as polyimide composites, it excels under chemically aggressive conditions where most other resins (and even inorganic materials) fall apart.
- Vespel® NR150 and Vespel® PMR-II-50 Based Parts: These high temperature composite resins use 6FTA [4,4'-hexafluoroisopropylidene-bisphthalic acid] as part of the polymer structure. These composites are utilized for their ability to form tough carbon fibre composites that can survive temperatures above which other composite resin matrices fail.
- Wear Strips: Composed of 30-40wt% PTFE fibre, these composite wear strips deliver low friction and wear properties to any bonded surface. They perform well in dirty environments where environmental contaminants would bind to traditional lubricants to form an abrasive sludge. While used primarily in aerospace applications, they also find applications elsewhere, such as e.g., in wind turbine connectors.¹²⁵
- Other Vespel® liner grades can range from 30-80% PTFE dependent on the properties required.

¹²⁵ US20230082462 A1; "Connecting structure of segmented wind turbine blades", DU PONT DE NEMOURS, 2022-09-09.

Function and technical performance of Vespel® products in transportation sector:

Transportation sector: Mechanical parts such as washers, bushings, and seal rings in the transmission and driveline, brake pad sensor pads, EGR valves in emissions control, and rollers in the clutch. Examples include:

- Automotive: Light vehicles, military vehicles, off road (construction, mining, farming vehicles such as tractors), and military vehicles such as armoured cars, tanks.
- Marine: Generally military applications (submarines, naval ships, amphibious vehicles- applications are confidential but key requirements include strength, coefficient of friction, electrical resistivity, chemical resistivity, dimensional stability, thermal stability.
- Aerospace: Vespel® products in the aerospace transportation sector provide wear and friction reduction, high-temperature resistance, chemical resistance, dimensional stability, and weight savings, contributing to improved performance and reliability in critical components. Thermal stability is of utmost importance, particularly in applications such as aero engines, where it is considered important for safety.

By withstanding high temperatures and harsh operating environments, Vespel® parts and shapes provide new design options for automotive powertrain and driveline components. Fluoropolymers like PTFE are critical ingredients when blended with other engineering plastics and polyimide resins by acting as a processing additive, and as an internal lubricant or physical property modifier for critical non-metallic engineered components, in aerospace and other transportation related uses. Alternatives have been tried for most of these applications but have not provided the performance characteristics required for the critical applications.

Vespel® parts and shapes offer outstanding friction reduction properties. Friction is the major contributing factor in automotive loss of efficiency through the whole powertrain from the engine down to the wheels. These products enable new designs of turbochargers and emission control systems (EGR valves) for new fuel-efficient engines. Low leakage and friction polyimide seal rings reduce energy losses in automatic transmissions. Thrust plugs and bearings made of polyimide resins enable electric motors to be smaller and more energy efficient.

Advanced mobility with electric, hydrogen and hybrid options are growing fast and their wear and friction, low weight and thermal requirements are often greater than internal combustion engines. Additionally, modern models of ICE (Internal Combustion Engine) and BEV (Battery Electrical Vehicles) generate more heat and involve more aggressive gases, fluids, and acidic gas/air mixtures, often under high pressure. Many traditional materials can no longer perform in these much hotter, confined, and stressed environments. Seal rings for transmissions in off road vehicles, such as tractors and mining vehicles, demand high performance. There are a few composite applications in transportation, primarily for the military in armoured cars and tanks, to withstand extreme conditions with high MTTR (mean time to repair). Composites generally have not scaled to non-aerospace transportation except for key areas like the military.

Function and technical performance of Vespel® products in chemical processing sector:

Vespel® parts and shapes are in a diverse area of the chemical processing sector including:

- Mechanical and sealing parts for pumps, valves and compressors in the chemical processing sector and the gas sector (chemical resistance, seizure failure reduction, vibration reduction)
- Ball Valve Seats for Liquid Natural Gas (sealing in cryogenic conditions)
- Sealing parts in hydrogen stations (gas permeability and low wear key characteristic)
- Pump Wear rings, throttle bushings, agitator bushings, vertical pump shaft bearings (chemical resistance, seizure failure reduction, vibration reduction)

Function and technical performance of Vespel® products in industrial manufacturing sector:

Vespel® parts and shapes are in a diverse area of the industrial manufacturing sector including:

- Inserts and fingers to handle glass on the manufacturing line in glass handling equipment,
- bushings in the textile machines,
- insulating parts in welding/cutting torches (welding tools are then used in multiple industries that use welding/cutting torches such as construction, transportation, automotive manufacturing, etc.)
- Wear pads in compressors for heat pumps,
- Ball bearings in dental drills,
- Ferrules in scientific equipment

Function and technical performance of Vespel® products in military and defence:

Military applications cover a broad spectrum of uses, most of them would be considered in the 'transportation' sector, but with very specific uses across the various branches. Like the aerospace sector in general, long cycles of support are expected, with requirements for strict reporting of any changes to the manufacturing process. Generally military applications (submarines, naval ships, amphibious and land vehicles, space, and aerospace)- are confidential but key requirements include strength, coefficient of friction, electrical resistivity, chemical resistivity, dimensional stability, thermal stability.

Summary of key technical performance and requirements of Vespel® parts and shapes per key sector

The following table provides an overview of the key function and performance in general as well as more specific to key sectors:

Table 9: Overview of the key function and performance in general as well as more specific to key sectors.

Sector	Key function and performance
Key general performance characteristics	- Water/moisture resistance - Chemical resistance - Electrical resistance - Temperature resistance (thermal stability) - Non-flammability - Low coefficient of friction - Self-lubricating properties - Low wear/friction - Light weighting - Absence of a melting point - Low outgassing - Thermal insulation
Transportation sector (including aerospace)	- By withstanding high temperatures and harsh operating environments, Vespel® parts provide new design options for automotive powertrain and driveline components. - Outstanding friction reduction properties. - The lightweight nature of PFAS materials helps in achieving fuel efficiency and lower energy consumption. - Thermal stability is of utmost importance, particularly in applications such as aero engines, where it is considered critical to safety.
Industrial Sector	- Chemical resistance and low chemical permeability. - Compliance to create a physical barrier between mated surfaces. - Low wear and friction where used in moving parts.
Semiconductor Sector	- Chemical resistance and low chemical permeability. - Compliance to create a physical barrier between mated surfaces. - Low outgassing and resistance to particle generation.

*Source: RPA, 2023¹²⁶

4.3.2. Identification of known potential alternatives to Vespel® parts and shapes

This section will further elaborate on identified non-PFAS alternative materials and their feasibility to replace Vespel® parts and shapes in high demanding industrial operating environments.

¹²⁶ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

Table 10: Identified potential alternatives to Vespel® parts and shapes.

Alternative	Vespel® parts and shapes Comparison
Steel & other metals	Higher weight, higher coefficient of friction higher fuel consumption, more maintenance, and higher cost to maintain. Vespel® parts and shapes are typically used as a sacrificial component to protect metal countersurfaces. Metals typically require lubrication to prevent galling, and hydrocarbon oils and greases are limited in temperature to <200°C due to evaporation and oxidation.
Polypropylene	Very low temperature resistance, below 100°C, not sufficient resistance to aggressive chemicals/oxidation.
Polyvinyl chloride (PVC)	Very low temperature resistance, below 100°C. Decomposes readily to form hydrochloric acid at high temperature, leading to corrosion.
Glass/ceramics/mica	Natural mica is a mined material and requires careful handling and sourcing. It exhibits properties such as being more brittle and challenging to machine compared to other options. Additionally, the production of parts using natural mica tends to be more expensive. As a result, it is estimated that only a limited portion, approximately 5%, can be effectively replaced by ceramics or other suitable alternatives.
Polyether sulphone	Long-term service temperature up to 180 °C is too low for many applications for which Vespel® parts and shapes are used. Resistant to certain types of media (e.g., aliphatic hydrocarbons, alcohols, some types of chlorinated hydrocarbons, certain aromatic chemical agents, oil and grease), but not sufficiently broad chemical resistance.
Isostatic shapes	Uses PTFE in production of high-volume direct-form products. Stock shapes could theoretically be used instead of direct-form parts. However, opting for stock shapes is considerably more expensive, and there are limitations in production capacity to meet even current demand. Moreover, using stock shapes leads to increased material waste as the parts need to be machined to achieve the desired specifications.
Polyamides	Long-term service temperature up to 200 °C with specialized PA6.6 Not able to withstand a broad range of relevant aggressive media.
Polyether ether ketone (PEEK)	Glass transition temperature: If the performance temperature of 150°C is not exceeded and hence, Vespel® parts and shapes are not required, PEEK is used. PEEK is not a thermoset material. It is uncertain whether these alternatives contain PFAS. In some cases, a tolerance of 5-10% failure rate might be accepted, otherwise a redesign of the system is considered. PEEK design guide suggests that PTFE is commonly used as a processing aid. ¹²⁷
Polyamide-imide	Competitive material for lower temperature applications but is also commonly formulated with PTFE to enable processing. ¹²⁸

Source: RPA, 2023¹²⁹

Alternatives are unable to meet the critical requirements of applications that demand the properties that Vespel® parts and shapes offer.

¹²⁷ Available at: <https://www.emcoplastics.com/assets/pdf/peek/Processing%20Guide-PEEK.pdf> (Accessed in July 2023).

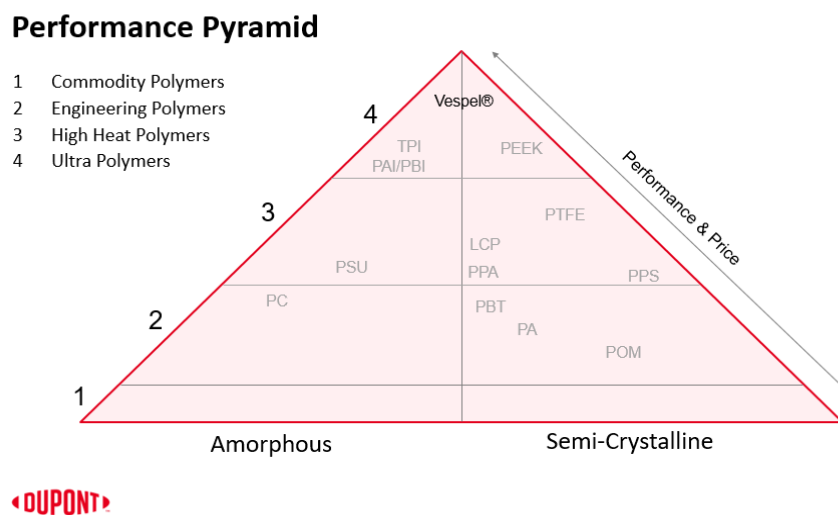
¹²⁸ Available at: https://drakeplastics.com/wp-content/uploads/2020/01/Torlon-PAI-Design-Guide_EN-227547.pdf (Accessed in July 2023).

¹²⁹ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

For some Vespe[®] parts and shapes, the PFAS provide critical wear and friction properties which no other materials can achieve. In these products, fluoropolymers are a significant component of the Vespe[®] part and shapes. Also, the use of PTFE in direct-form parts is able to reduce the mould-wall friction during processing, and also withstand the final sintering cycle which reaches temperatures >400°C. To our knowledge there are no other materials in existence that can achieve this, with the efficacy of PTFE, or at the low loadings used with the fluoropolymer processing aid. These low loadings enabled by the PFAS are unique, as they lead to no impact on the final properties of the Vespe[®] part. Initial scouting experiments have shown that alternative solid lubricants are required at >10x the loading level, which significantly impacts the mechanical integrity, and likely various other properties of the final part.

Figure 22 illustrates Vespe[®] parts and shapes' excellent performance in comparison to other polymers.

Figure 22: Performance pyramid



Source: Based on DuPont's internal data, 2023

Bronze

Bronze is a self-lubricating metal alloy that is composed of copper and tin. It possesses several characteristics that makes it useful for industrial operating environments. It is harder than pure copper, providing durability and resistance to wear and corrosion. It is also more malleable and ductile than iron, allowing for easy casting and shaping.

Nevertheless, using bronze instead of Vespe[®] parts and shapes would increase friction within component systems. This would require redesigning certain components to be larger in order to generate the necessary force. For example, actuators designed to work with Vespe[®] may not supply sufficient torque when bronze bushing are used due to increased friction. Consequently, the entire system would need to be redesigned. Additionally, bronze bushings rely on lubrication, which would not be feasible in all industrial operating environments due to high operating temperatures, as any lubricants used would quickly evaporate or burn up. Implementing lubrication systems would add

weight, and frequent oil replacement would be necessary to maintain viscosity. **If the lubrication system fails, bronze bushings can render countersurfaces irreparable.** This difference in friction resistance is also illustrated in a test in Figure 23 below.

Figure 23: Vespel® thrust washer in comparison to bronze



Source: Based on DuPont's internal data, 2023

Using bronze as a replacement for Vespel® wear strips may lead to additional risks, including increased vibrations and friction between the bronze material and equipment components. **Bronze would require the use of a lubricant; otherwise, the metal-on-metal friction could result in the release of small metal fragments within the equipment.** These fragments could inadvertently spread to other machining and industrial parts, potentially causing an equipment failure. Moreover, the interaction between dissimilar metals in a metal-on-metal scenario could induce galvanic corrosion, further compromising the integrity of the components.

Considering these risks and challenges, it can be concluded that switching to bronze as a replacement for Vespel® parts and shapes would not be technically feasible or advisable, particularly in the context of demanding industrial operating environments.

Bronze bushings are also cheaper than Vespel® bushings, so existing applications would have already considered bronze as an alternative.

Comparing both the technical and economic feasibility, an overview of the conclusion of the assessment of bronze as an alternative for Vespel® is summarised in Table 11 below.

Table 11: Summary of technical and economic feasibility of using bronze as an alternative.

	Bronze
Chemical resistance	Under normal operating environments, bronze exhibits resistance to fluids containing ethylene glycol
Electrical resistance	Electrical conductor
Temperature resistance	Maximum operating temperature of 260 °C to 398 °C
Self-lubricating	Yes, but requires lubrication to keep frictional heating low.
Vibration and wear resistance/low coefficient of friction	Coefficient of friction of 0.08 – 0.14
Shear strength	80 – 140 MPa, vary depending on the alloy
Costs to implement	The use of bronze, with its larger parts, increased weight, and higher coefficient of friction, would necessitate a redesign of systems to accommodate the necessary force. This system redesign would entail thorough equipment testing to ensure the effective operation of the systems.

Source: RPA, 2023¹³⁰

Isostatic Vespel®

Isostatic Vespel® is produced using a proprietary (and export controlled) isostatic process, which does not involve intentionally adding PFAS materials. **The isostatic process allows for the creation of large meter-long rods of Vespel® that are subsequently transformed into stock shapes.** These stock shapes can be made from various grades of Vespel® and possess isotropic properties, meaning they exhibit consistent directional properties throughout the material. This type of Vespel® is often used for custom orders in commercial aviation, where isotropic properties are required for specific applications.

The rate of production would not be sufficient to meet the demand for commercial aviation and industrial operating environment equipment and shapes, which relies on the faster production of direct form parts, capable of being produced at a rate of thousands per 24 hours. Scaling up production would require additional production vessels.

Comparing both the technical and economic feasibility, an overview of the conclusion of the assessment of isostatic Vespel® as an alternative for direct form Vespel® products summarised in Table 12 below.

¹³⁰ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

Table 12: Summary of technical and economic feasibility of using isostatic Vespel® as an alternative.

	Isostatic Vespel® shapes
Chemical resistance	Under normal operating environments, isostatic Vespel® shapes are resistant to fluids containing ethylene glycol
Electrical resistance	Electrical insulator
Temperature resistance	Maximum operating temperature up to 370 °C.
Self-lubricating	Yes
Vibration and wear resistance/low coefficient of friction	Coefficient of 0.03 (lubricated)
Shear strength	77.2 MPa @23 °C SP-21 ISO, 89.4 MPa @23 °C SP-1 ISO
Costs to implement	Redesign would be necessary, in some cases, if switching to isostatic Vespel® shapes as a replacement for current Vespel® parts. Meeting the current demand for direct form Vespel® parts would require the construction of a new facility. The manufacturing process of Vespel® shapes involves machining away up to 50% of the material, which cannot be recycled and must be incinerated. This is due to the complexities of the shape that cannot be easily achieved through isostatic manufacturing methods.

Source: RPA, 2023¹³¹

Thermoplastics, in particular PEEK and PAI

Thermoplastics are a class of polymer materials that can be repeatedly melted and solidified under pressure. Some common examples of thermoplastics include polyether ether ketone (PEEK), polyamide imide (PAI), polycarbonate (PC), polyacetal (POM), high-temperature nylon (HTN), and polyethylene terephthalate (PET). In the following section, the suitability of these materials as potential alternatives to Vespel® parts and shapes will be assessed, taking into consideration their technical feasibility.

Many Vespel® grades exhibit an extensive useful temperature range from -196°C to 350°C and do not have an observable melting point. When comparing the thermal properties of alternative thermoplastics to those of Vespel® parts and shapes, it becomes evident that they lack the necessary thermal resistance requirements for industrial operating environments. Table 13 below illustrates the thermal properties of the aforementioned thermoplastics.

¹³¹ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

Table 13: Thermal properties of thermoplastics in comparison of Vespel®.

	Continuous service temperature
Vespel® (polyimide parts only)	300°C – 370°C
Polyether ether ketone (PEEK)	154°C – 260°C
Polyamide imide (PAI)	220°C – 280°C
Polycarbonate (PC)	115°C – 130°C
Polyacetal (POM)	80°C – 105°C
High-temperature nylon (HTN)	210°C – 230°C
Polyethylene terephthalate (PET)	80°C – 140°C

Source: Xometry, 2022¹³²

While PEEK and PAI do not reach the same level of temperature resistance, they are closest in temperature resistance performance to Vespel® direct form parts compared to other thermoplastics. Therefore, this assessment will only examine these two alternatives further. PEEK and PAI design guides recommend the use of PTFE processing aids and would be also restricted based on the draft proposal scope.

PEEK and PAI exhibit higher coefficients of friction compared to Vespel® direct form parts, namely 0.049, 0.051, and 0.030, respectively)¹³³. **This implies that when using these materials, the energy loss will be higher, resulting in more energy consumption.**

Furthermore, the PV limits of PEEK and PAI are inferior to those demonstrated by Vespel® direct form parts. The PV limit represents the point at which failure occurs under a specific PV load, typically identified by a sudden increase in wear rate of the material¹³⁴. PEEK has a PV limit of 5.2 MPa*m/s, while PAI has a limit of 1.8 MPa*m/s.¹³⁵ In contrast, Vespel® grades, such as SP-21 and SCP-5050, exhibit PV limit of 12.3 and 24, respectively. **These lower PV limits of the substitute materials imply that they would not be able to withstand the same pressure and velocity of moving parts as Vespel®, and their deterioration would occur at a faster rate even under lower operating conditions. This improved level of performance also provides Vespel® direct form parts with a much higher safety factor, which can be critical in many transportation or industrial applications.**

As PEEK and PAI were concluded not to be technically feasible candidates, an economic assessment was not performed.

¹³² Xometry, 2022. Nylon: Uses, Types, and Materials. Available at: <https://www.xometry.com/resources/materials/nylon/> (Accessed in July 2023).

¹³³ DuPont, 2015. DuPont™ Vespel® parts and shapes white paper. Available at: [https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/Vespel\(R\)_Innovation_Opportunities_English_White_Paper_21Apr15.pdf](https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/Vespel(R)_Innovation_Opportunities_English_White_Paper_21Apr15.pdf) (Accessed in July 2023).

¹³⁴ DuPont, 2022. DuPont™ Vespel® S line. Available at: [https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/Vespel\(R\)_Innovation_Opportunities_English_White_Paper_21Apr15.pdf](https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/Vespel(R)_Innovation_Opportunities_English_White_Paper_21Apr15.pdf) (Accessed in July 2023).

¹³⁵ DuPont, 2022. DuPont™ Vespel® S line. Available at: [https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/Vespel\(R\)_Innovation_Opportunities_English_White_Paper_21Apr15.pdf](https://www.dupont.com/content/dam/dupont/amer/us/en/vespel/public/documents/en/Vespel(R)_Innovation_Opportunities_English_White_Paper_21Apr15.pdf) (Accessed in July 2023).

Comparing both the technical and economic feasibility, an overview of the conclusion of the assessment of thermoplastics PEEK and PAI as an alternative for Vespel® direct form parts are summarised in Table 14 below.

Table 14: Summary of technical and economic feasibility of using thermoplastics (specifically PEEK and PAI) as an alternative.

	Thermoplastics (PEEK and PAI)
Chemical resistance	Under normal operating environments, PEEK and PAI exhibits resistance to fluids containing ethylene glycol
Electrical resistance	Electrical insulator
Temperature resistance	260 °C and 280 °C respectively
Self-lubricating	Yes, if composite with other materials (graphite)
Vibration and wear resistance/low coefficient of friction	Coefficient of friction of 0.049 for PEEK and 0.051 for PAI (lubricated)
Shear strength	55 MPa @ 23 °C
Costs to implement	As the materials would melt in high-temperature sections of industrial operating environments, it would not be used. Yet, assuming technically feasible, it would necessitate a complete redesign of equipment used.

Source: RPA, 2023¹³⁶

4.3.3. Typical innovation process and timing for Vespel® parts and shapes

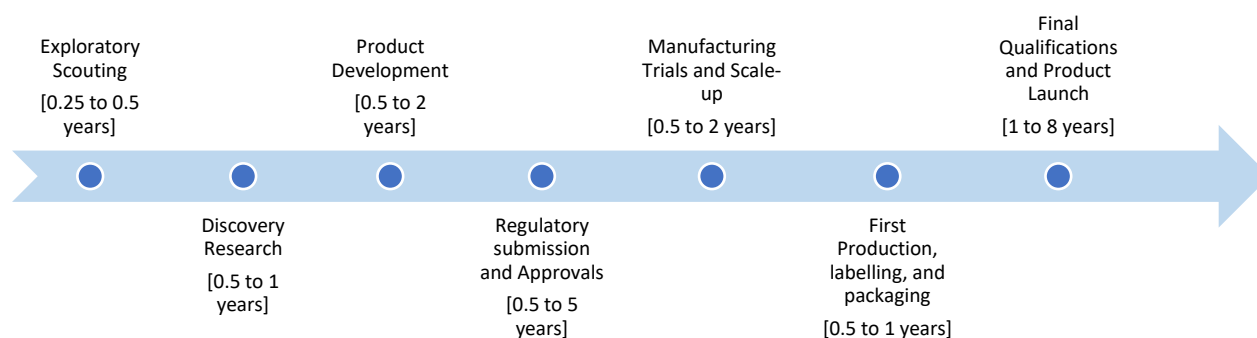
For Vespel® parts and shapes, projects have been initiated to develop alternatives to PFAS in some products such as replacing the PTFE micropowder that is used in direct-form parts. In all other Vespel® products that use PFAS, the fluoropolymer constitutes a large fraction of a part or purchased component, and therefore no alternatives exist.

Historically innovation in Vespel® has been driven by both process development and new industrial applications. The overall development timeline for substitution efforts – if alternatives can be found - spans several years, typically requiring 5+ years for research and development for the exploratory phase of alternate material identification. Then, a qualification for all materials impacted occurs (additional 3 years) before customer qualification. Qualification with customers will vary with application and hazards of part failure. Given the high cost of the materials in this marketplace, it is a market reality that it would have been replaced with cheaper materials that would match the requirements should such products already exist.

An example innovation process is shown below, with timing varying with end use application and industry.

¹³⁶ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

Figure 24: Example Timeline of Vespel® New Product Development Process.



As shown in Figure 24, the innovation process from exploratory scouting to final qualification and product launch can take many years. Initial research efforts include exploratory scouting of new replacement materials or technologies, initial discovery experiments to test hypotheses, and then significant product development if the technology proves successful. Implementing a new polymeric processing aid (PTFE micropowder) would necessitate requalifying everything, involving a rigorous process of requalifying resin and obtaining approval from both internal and customer stakeholders. Quality assurance measures would also be crucial. The transition to the program would require converting production equipment to ensure compliance, which entails expenses without generating immediate income. Research and development efforts are conducted on in-kind equipment, but all innovations must ultimately undergo qualification on production assets. Consequently, every individual part would need to go through a qualification process. In cases where emissions or safety are affected, local agencies may need to be informed or provide regulatory approval. The approval process in such areas can take 5 to 10 years once the design is submitted for review.

In the majority of the Vespel® product lines, the PFAS plays a critical role in the property and function of the material, and therefore no alternative materials are being explored to replace the PFAS. This includes the PFA in Vespel® CR, the granular PTFE in SP-211, the PTFE fabrics in Vespel® wear strips, track liners and other composites, and the 6FTA based resins using in Vespel® composite materials.

4.4. Overall conclusion on suitability and availability of alternatives

Kalrez® perfluoroelastomer parts (FFKM)

Considering the extreme conditions which occur in highly demanding applications as described in this section, there are no alternatives to FFKM.

It should be noted that **FFKM is only used where absolutely necessary and the conditions do not allow any other material**. This is because perfluoroelastomers are substantially (factor 10x vs closest elastomer) more expensive than alternative materials; therefore, it is only purchased for applications where no other elastomeric material can withstand the chemical and temperature environment. Substitution of FFKM therefore naturally takes place due to economic considerations alone where technically possible. **This point has specifically been acknowledged by the dossier submitters.**¹³⁷ In other words, given the relative high cost of FFKM, **in applications where FFKM are used, the next-best alternative has already been tested against the performance requirements and has been found to be inadequate.**

Vespel® parts and shapes

After a strategic assessment of the product line, projects have been initiated to develop alternatives to PFAS in some products such as replacing the PTFE micropowder that is used in direct-form parts. In all other Vespel® products that use PFAS, the fluoropolymer constitutes a large fraction of a part or purchased component, and therefore no alternatives exist.

Alternatives have been explored for the polymeric processing aid in direct form parts but have not provided the performance characteristics required for the critical applications. The main obstacle encountered with many alternative materials is their inability to match the desired combination of chemical resistance, thermal stability, compliance, low friction, and/or tribological properties required for specific applications, resulting in premature failure. In the case of non-PFAS alternatives, their performance falls significantly behind the fluoropolymer. They are unable to meet the critical requirements of applications that demand both high temperature and high chemical resistance.

The same economic logic described above with Kalrez® perfluoroelastomer parts is also relevant for Vespel® parts and shapes. Given the high cost of the material, it is a market reality that it would have been replaced with cheaper materials should such products exist that meet all the requirements.

¹³⁷ Annex E to the restriction report, version 2 (22 March 2023), p. 498-499.

5. PERSPECTIVE ON IMPACTS

The sections below provide a general overview of the environmental, social, and economic impacts, considering hazard properties of the PFAS used in Vespel® parts and shapes and Kalrez® perfluoroelastomer parts, market impacts (i.e., on the product market), and macroeconomic consequences resulting from a potential restriction of the PFAS used in Vespel® parts and shapes and Kalrez® perfluoroelastomer parts.

5.1. Hazard properties

The proposed restriction aims to limit the risks to the environment and human health from the manufacture and use of a wide range of PFAS due to their persistent, bioaccumulative and toxic (PBT) or very persistent and very bioaccumulative (vPvB) properties. Therefore, this section aims to present the hazard properties of the PFAS utilized in Vespel® parts and shapes and Kalrez® perfluoroelastomer parts. The analysis of hazard properties below mainly focuses on Polytetrafluoroethylene (PTFE), Poly(tetrafluoroethylene-co-perfluoroalkylvinyl ether) perfluoroalkoxy polymer (PFA), FKM, and FFKM (Perfluoroelastomer).

Annex III and XIII to the REACH Regulation set criteria for identification of the substances that are PBT and vPvB. Below are the PBT/vPvB assessments for PTFE, PFA, FKM, and FFKM:

P/vP - Persistency: Although the exact degradation half-life data of PTFE, PFA, FKM and FFKM are not measured, they are expected to be on the order of years, surpassing the vP criteria. Therefore, PTFE, PFA, FKM, and FFKM meet the P/vP criteria¹²¹.

B/vB – Bioaccumulation: Due to their high number average molecular weight, PTFE (389,000 – 8,900,000 Da)¹³⁸, PFA (200,000 – 450,000 Da)¹³⁹, and FFKM (60,000 -10,000,000 Da)¹⁴⁰ are not expected to bioaccumulate. Animal studies suggest this is true for PTFE¹⁴¹ and is expected to be the same for PFA, FKM, and FFKM.

¹³⁸ Henry, B. J., Carlin, J. P., Hammerschmidt, J. A., Buck, R. C., Buxton, L. W., Fiedler, H., Seed, J., & Hernandez, O., 2018. A critical review of the application of polymer of low concern and regulatory criteria to fluoropolymers. *Integrated Environmental Assessment and Management*, 14(3), 316–334.

¹³⁹ Henry et al., 2018.

¹⁴⁰ Henry et al., 2018.

¹⁴¹ Lee S, Kang KK, Sung SE, Choi JH, Sung M, Seong KY, Lee J, Kang S, Yang SY, Lee S, Lee KR, Seo MS, Kim K. In Vivo Toxicity and Pharmacokinetics of Polytetrafluoroethylene Microplastics in ICR Mice. *Polymers (Basel)*. 2022 May 30;14(11):2220. doi: 10.3390/polym14112220. PMID: 35683896; PMCID: PMC9182653.

T - Toxicity: PTFE, PFA, FKM, and FFKM are not classified as carcinogenic (category 1A or 1B), germ cell mutagenic (category 1A or 1B), or toxic for reproduction (category 1A, 1B, or 2). Their large molecular weight and structural properties prevent them from entering human cells, binding to cell receptors, or interacting with other biomolecules. Although there is limited available data on the toxicity of FFKM,¹⁴² its characteristics such as lack of water solubility and other properties suggest that the substance is unlikely to be toxic (not T).

Based on the above information, it can be concluded that PTFE, PFA, FKM, and FFKM are very persistent (vP), not bioaccumulative (not B), and likely not toxic (not T) according to REACH Annex III and Annex XIII. Therefore, PTFE, PFA, FKM, and FFKM do not meet the PBT/vPvB criteria as specified in REACH regulation.

5.2. Environmental emissions of Vespel® parts and shapes: Manufacturing, in-use, and end-of-life

This section aims to examine and analyse the environmental emissions to air and water that occur **throughout the entire lifecycle of Vespel®** parts and shapes in high demanding industrial environments. The section takes into account emissions occurring during the manufacturing process, the service life of the materials, and their end-of-life stages. As the manufacturing of Kalrez® products taking place outside of the EEA and the focus of this assessment being limited to environmental emissions within the EEA, emissions during the manufacturing process of Kalrez® are only briefly assessed in the next section.

The emissions sections 5.2.1 through 5.2.3 are directly from the RPA (2023): Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, August 2023, Norwich, Norfolk, UK.

5.2.1. Emissions during manufacturing (Mechelen site only)

Air

DuPont site at Mechelen, Belgium, processes polyimide powder mixed with PTFE to form Vespel® polyimide parts and shapes. There are additional grades of Vespel® parts and shapes that contain other PFAS materials, but they are all manufactured outside of the EEA. The PTFE composition (%) of the polyimide resin depends on the Vespel® product requirements. At the Mechelen facility, the Vespel® resin powder containing PTFE is stored in plastic bags in closed containers. For product manufacturing using mechanical, hydraulic and electric presses, the resin is added manually to the hopper above the press by pouring the resin directly from the bag. Above the hopper, a ventilation system is installed due to combustible dust hazard requirements; additionally, the hopper itself is connected to a central vacuum system. This system collects dust from hoppers and presses it in plastic bags installed outside of the facilities. Due to this ventilation system at the Mechelen facility, emissions of PTFE to air during Vespel® manufacturing are expected to be negligible. During the manual addition

¹⁴² DuPont's FFKM grade meets FDA (Food and Drug Administration) and USP (United States Pharmacopeia) Class VI (in vitro & in vivo test) regulatory standards - which are preferred for applications involving contact with humans, including skin contact. When an FFKM grade is classified as FDA and USP Class VI, it indicates that the material has met the required standards for biocompatibility and safety, including skin contact with humans. These classifications provide reassurance that the material is suitable for use in medical devices, pharmaceutical processing, and other applications involving direct contact with living organisms.

of the resin to the hopper, not all dust is collected by the ventilation system. This residual dust precipitates around the hopper and is removed during cleaning procedures (occurring weekly or monthly) to be emitted via water that is sent to the wastewater treatment plant or collected in the waste (see following section).

Water

Emissions to water at the Mechelen facility occur predominantly during the tumbling process, as this tumbling is the only major process during manufacturing involving water. Vespel® parts and shapes are tumbled with media, soap, and water to polish and clean the product, as well as to remove burrs. The tumbling process occurs after sintering which ensures the PTFE is in a solid matrix in the article. A large volume of water is used in this process which is afterwards sent to the wastewater treatment plant. Additionally, a minor part of the PTFE-containing water will originate from cleaning processes. Estimations of PFAS emissions to water at the Mechelen facility were based on analytical measurements of the process water (wastewater originating from the tumbling process, excluding sanitary water). Since no analysis of PTFE or Vespel® in the wastewater was performed, measurements of suspended solids were considered as 100% Vespel® according to a conservative worst-case approach. The solids could be soap, tumbling media pieces, or Vespel® material. Suspended solids in the process water averaged at 115 mg/L, based on five measurements performed during 2018 to 2019.

Provided the median flow rate of Vespel®-containing effluent at the Mechelen facility is ca. 4 m³ /day and Vespel® is manufactured 245 days/year, it is expected that the average emission of Vespel® to water is ca. 113 kg/year. However, the low PTFE content (ca. 0.3%) grades of SP-1, SP-21, SP-22, SCP-5050, SP-2515, ST2010, ST-2030 and SCP-50094 Vespel® compose 99.7% of the Vespel®-containing products, which would result in ca. 0.34 kg PTFE/year being emitted to water. These grades represent the total used at Mechelen and are not specific to any market segment. Vespel® SP-211 products, containing 10% PTFE content, make up 0.3% of the total annual Vespel® products manufactured and contributes ca. 0.034 kg of PTFE per year. The total emissions of PTFE via wastewater at the Mechelen manufacturing facility are thus estimated to be ca. 0.37 kg/year.

Assuming that these emissions change in a directly proportional relationship to the growth of Vespel® product production at the Mechelen site (estimated at 4%/year) then it is possible to estimate the PTFE emissions to water over the total study period (2021 to 2030). This results in an estimated release of approximately 5.0 kg of PTFE to water from the Mechelen site between 2021 and 2030. It is important to consider that the above numbers are likely an overestimate (due to the assumption that all suspended solids are Vespel® particles).

Waste

Plastic bags with dust collected by the central vacuum system are replaced every two weeks and **collected** in a container for non-hazardous waste. Together with the burrs from the tumbling process, this makes up the majority of the dry PTFE-containing waste. The waste container is collected twice a year in Mechelen for incineration as non-hazardous waste. The incinerator used for this waste is using best available techniques, is ISO14001 certified, and is suitable for the treatment of PFAS waste.

Total Mechelen Vespel® waste in 2022 (powder and parts) was ca. 2,628 kg with an equivalent weight of ca. 7 kg of PTFE. This has been calculated from the product yield. Assuming a directly proportional relationship with production increase and an unchanging product yield figure this data can be used to estimate a total of ca. 95 kg of PTFE waste produced over the study period (2021 to 2030). This waste is a total number for all Vespel® applications at the Mechelen site, which are broader than aerospace. Emissions from this waste are expected to be negligible due to the appropriate waste processing being used at the incinerator site.

5.2.2. Machining

Following manufacturing, specific Vespel® parts are machined. Two machining shops process Vespel® products in Europe, one in Belgium and one in Portugal. All Vespel® products requiring machining are machined in these two shops. Approximately 50% of the products machined at these shops go into aerospace applications. The majority of the remainder is machined for heavy duty transportation (power sports, construction/mining equipment). The bulk of the Vespel® parts from Mechelen are sold as net or near net shapes and either used as is, or machined by customers.

Air and water

The machining of Vespel® products is conducted in a closed system and does not result in Vespel® dust formation. Moreover, machines are solely allocated to the processing of Vespel® products, hence no cleaning is required. During machining, therefore no emissions are expected to occur to air or water, respectively.

Waste

Vespel® offcuts from the machining of products are gathered in closed systems and then collected in a waste container, and incinerated.

Following manufacturing, specific Vespel® parts are machined. Two machining shops process Vespel® products in Europe, one in Belgium and one in Portugal. All Vespel® products requiring machining are machined in these two shops. Approximately 50% of the products machined at these shops go into aerospace applications.

Less than 1% (ca. 8 kg) of the total waste produced by both machine shops is estimated to be SP-211 grade (10% PTFE). It is also expected that a further 5% of the total waste (ca. 40 kg) is Vespel® from the machining of stock shapes not containing PTFE. In total, the estimated PTFE-containing waste produced during machining is ca. 760 kg Vespel® containing ca. 3.1 kg PTFE. Waste is sent to local treatment sites twice a year, where it is incinerated. The conditions of these incinerators are unknown and so up to ca. 3.1 kg of PTFE may be emitted from machine shop waste each year.

On the basis that machine shops production will increase in line with that of DuPont it can be estimated that a total of ca. 42.1 kg of PTFE containing machining waste will be generated over the total study period.

5.2.3. Aerospace

5.2.3.1. Engine and aircraft assembly

Air and water

No environmental emissions to air or water are expected during engine and aircraft assembly as the vast majority of Vespel® and Kalrez® products are purchased as finalized articles by the engine manufacturer and directly incorporated into the engine without further processing. This would include Vespel® Polyimide Direct Formed Parts, Vespel® composite wear strips (i.e., CP-0664 and ASB-0664), and 6Fxx-based composite parts (i.e., Vespel® CP-8000).

Waste

No Vespel® waste is expected during engine manufacturing as finalized products are purchased and as such incorporated into the engine.

5.2.3.2. Emissions during service-life and End-of-Life

Air

Vespel® products are often used in high-wear, moving/sliding applications in aircraft engines to the extent that, depending on the location in the engine, wear can degrade parts and release particles during service-life. It is thus expected that Vespel® products end up broadly distributed in the environment during flight. To provide an estimate of the magnitude of the emissions, the amount of polymeric PFAS (PTFE or 6FTA/6FDA) in Vespel® aerospace products worldwide was calculated. This is expected to be around ca. 800 kg/year. After consultation with experts in aircraft maintenance, an average upper limit of wear has been set at 25% over the lifetime of a part. For the derivation of service life emissions, it has been assumed that a parts lifetime will also be 1 year to ensure consistency within the calculation. Replacement intervals for parts containing Vespel® products are however likely longer than 1 year. In total it is estimated, ca. 200 kg polymeric PFAS/year are emitted globally. These emissions can be released directly to air during flight, or if the particles remain inside the engine they can be rinsed off or wiped clean during maintenance. These particles would be a mixture of Vespel® and fluoropolymers and the calculation above is specific to the weight of fluoropolymer.

Given that growth rates previously used to model future emissions are specific to the Mechelen site and that these service life emissions will occur over variable maintenance intervals it is not deemed possible to reliably model how these service life emissions will change over the study period.

5.2.3.3. During maintenance

Water

Because of the high-wear application of Vespel® products, it is expected that PTFE-containing dust will be present on the engine. Prior to and during maintenance operations, the engine might be rinsed off with water, e.g., in an aqueous degreasing tank or using wet swabs, which can cause emissions to water. Aqueous waste coming from maintenance operations is expected to be treated through a wastewater treatment system. However, no information is available on such treatments.

5.2.3.4. Emissions during end-of-life

Waste

Little information was available on the duration of the service-life of O-rings, wear pads, wear strips, bumpers, and washers. However, based on the frequency of MRO, Vespel® and Kalrez® parts must be replaced after approximately 6,000 to 10,000 hours of flight time.

Similar to waste from other life-cycle stages, PFAS-containing waste produced during end-of-life is either incinerated or landfilled. Based on current knowledge it is not possible to accurately assume which of these waste treatment methods are used for which Vespel® parts and as such the fate of PFAS from end-of-life products is relatively unknown. It is however expected that if landfilled or incinerated under the proper conditions no significant PFAS releases will occur.^{143,144,145}

5.2.4. Industrial

5.2.4.1. Equipment Manufacturing and Assembly

Largest contributor of fluoropolymer in this segment is from Vespel® CR grades. This was calculated to be 1.3 MT/year as PFA (2022). This was supplied as shapes into the EEA. As these are shape sales, it is difficult to determine machining waste. If we assume 50% is lost to machining waste ca. 650 kg/year PFA would be either landfilled or incinerated.

Vespel® Direct Formed Polyimide parts and shapes are supplied primarily from the Mechelen production facility. These are primarily near net shapes that are machined by the customer. This is estimated at ca. 14.8 kg/year PTFE (2022). It is expected that 50% of this would be lost as machining waste to produce final parts (ca. 7.4 kg/year as waste) which would be sent to landfill or incinerators.

5.2.4.2. Emissions during service-life and End-of-Life in EEA

Since most industrial systems are closed loop systems, most emissions of materials in-use would end up being collected with other industrial wastes and incinerated. Likewise used parts (~667 kg/year as PTFE/PFA) would likely be contaminated with chemical waste and thus sent to industrial waste incinerators. Since the temperature and chemical exposure during use is varied for these applications, it is difficult to determine the service life of such parts.

¹⁴³ Bakker, J., Bokkers, B., Broekman, M. (2021). Per- and polyfluorinated substances in waste incinerator flue gases. RIVM Rapport. Available at: <https://rivm.openrepository.com/handle/10029/625409> (Accessed in August 2023).

¹⁴⁴ Aleksandrov, K., Gehrmann, H.J., Hauser, M., Mätzing, H., Pigeon, D., Stapf, D. and Wexler, M., 2019. Waste incineration of Polytetrafluoroethylene (PTFE) to evaluate potential formation of per- and Poly-Fluorinated Alkyl Substances (PFAS) in flue gas. Chemosphere, 226, pp.898-906. Available at: <https://doi.org/10.1016/j.chemosphere.2019.03.191> (Accessed in August 2023).

¹⁴⁵ Available at: <https://www.gore.com/system/files/2023-03/Summary-of-CRL-and-ALS-Studies-on-PTFE.pdf> (Accessed in May 2023)

5.2.5. Transportation

5.2.5.1. Equipment Manufacturing and Assembly

Consumption of Vespel® parts and shapes within the EEA is primarily Vespel® Direct Formed parts. Vespel® Direct Formed Polyimide parts and shapes are supplied primarily from the Mechelen production facility. These are primarily near net shapes that are machined by the customer. This is estimated at ca. 66.5 kg/year PTFE (2022). It is expected that 50% of this would be lost as machining waste to produce final parts (ca. 33.3 kg/year as waste) which would be sent to landfill or incinerators.

5.2.5.2. Emissions during service-life and End-of-Life in EEA

It is expected that most Vespel® parts would survive the life of the vehicle. Unlike aerospace, Vespel® is often used in lubricated drivetrain components where emissions would be captured in the closed oil systems. Only a few systems (i.e., break-pad wear sensors) where wear debris would be emitted to the environment. If we assume only 30% of the parts wear away 25%, this would result in ca. 2.5 kg/year (2022) would end up either in the environment during normal use. The remaining ca. 30.8 kg/year at the end-of-life would be expected to end up in landfills or incineration.

5.2.6. Semiconductor Manufacturing

5.2.6.1. Equipment Manufacturing and Assembly

It is estimated that ca. 528kg CR-6110 (2022) are supplied as plate shapes into the semiconductor manufacturing market in the EEA. This translates into ca. 422 kg of PFA imported as a part of the products. As these are shape sales, it is difficult to determine machining waste. It is assumed that machined waste is either landfilled or incinerated.

5.2.6.2. Emissions during service-life and End-of-Life in EEA

Since most semiconductor FAB systems are strictly environmentally controlled closed loop systems, any debris would be captured. Since this material is exposed to hazardous chemicals in service, it is expected that used parts are incinerated at end-of-life.

5.2.7. Conclusion on emissions

A conservative approach was applied to estimate the emissions including waste at the Mechelen site. Mechelen produces Vespel® products. As discussed above, the emissions to water have been estimated to be ca. 0.37 kg/year while emissions to air are considered negligible. It can be concluded that the majority of the environmental emissions occur during service-life (i.e., ca. 200 kg/year globally), primarily from aerospace uses and an additional ca. 2.5 kg/year from transportation in the EEA. It is estimated that the combination of waste from Mechelen, machine shops, and used Vespel® parts from the aerospace, transportation, Industrial, and electronic segments result in ca. 1472 kg/year of PTFE/PFA sent to incineration facilities. It is estimated that ca. 932 kg/year of PTFE/PFA machine waste (machined by customers outside of DuPont control) is sent to landfills via machining waste from transportation, industrial, and electronics machine shops at end of life.

Data for emissions in landfills is not available. DuPont is participating in an FPG study to better determine likely emissions in landfill situations.

5.3. Environmental emissions of Kalrez® perfluoroelastomer parts: An overview

This section aims to provide a brief overview of the environmental emissions relating to Kalrez® perfluoroelastomer parts. As the manufacturing of Kalrez® products taking place outside of the EEA, this section will focus on the environmental emissions impacts analysis that is relevant for the EEA.

Kalrez® perfluoroelastomer parts uses laboratory accelerated aging tests in product R&D and for manufacturing quality control. Many of these are industry standard tests but some are proprietary tests of DuPont's own design. Weight loss measurements during these tests suggest that, by the time a seal loses ca. 0.5% of its weight, it would no longer be functional as a seal for most grades and applications. This sets an upper bound on potential emissions during the lifetime of a seal.

The amount of this weight loss that is fluorinated is not fully understood yet, but can be estimated. **Based on the annual sales of Kalrez® perfluoroelastomer parts in the EEA, the expected PFAS emissions emitted through usage amounts to less than 0.375 kg per year.**

The following is used to estimate emissions:

- Seals are replaced when reaching 0.5% weight loss,
- No more than 10% of the weight loss is fluorinated emissions (10% of the 0.5% weight loss = 0.05%),
- **Less than 5% of the fluorinated emissions are potentially PFAS (5% of the 0.05% fluorinated emissions).**

Published data for the semiconductor manufacturing industry on outgassing shows that water, oxygen, nitrogen, carbon monoxide, and carbon dioxide are all emitted in much greater amounts than any fluorine containing substances.¹⁴⁶ It is challenging to estimate the exact emissions with any precision because some of the substances, especially the water, are adsorbed on the seal rather than produced from seal degradation. Yet, even in the most conservative case, **no more than 10% of the emissions are fluorinated**. This is in line with DuPont's internal measurements (by, for instance, measuring the fluorine content of test fluids by ion chromatography).

From the above data it can be derived that no more than 0.05% (10% of the 0.5% weight loss) of fluorinated weight loss can occur before the seal becomes ineffective. Both sets of data further indicate that the majority (>95%) of fluorinated weight loss (0.05%) is not PFAS.

For Kalrez® perfluoroelastomer parts, it can be reasonably assumed that the amount of used material disposed of each year is roughly equal to the amount sold in the EU. A small amount of material will

¹⁴⁶ Heller, M.J., Sogo, S., Chen, J. and Legare, J., 2010, July. Outgassing characterization of elastomeric seals used in semiconductor wafer processing. In 2010 IEEE/SEMI Advanced Semiconductor Manufacturing Conference (ASMC) (pp. 68-71). Available at: https://www.researchgate.net/publication/224168450_Outgassing_Characterization_of_Elastomeric_Seals_Used_in_Semiconductor_Wafer_Processing (Accessed in August 2023).

be imported and re-exported and some uses will last well over one year, but the **majority of uses are replacements of existing seals during routine maintenance.**

Incineration is currently recommended by DuPont for its seals, and is required in many EU countries due to high fluorine content and the exposure to hazardous chemicals during use.¹⁴⁷ Seal uses are industrial (as described before, mostly in semiconductor manufacturing and chemical industries) and it is expected that most users will incinerate. It cannot be excluded that some number of used materials may end up in landfills (recycling is currently not possible), with the majority being incinerated.

Kalrez® parts are used in static and dynamic applications with very low displacement which is not creating wear on the seal. No wear of Kalrez® perfluoroelastomer parts is expected while parts are in service. Data for emissions in landfills is not available. Due to the materials' very long lifetimes, emissions are expected to be very low. Species are unknown, although, as described above for emissions in the use, a large majority of emissions would be expected to be in the form of hydrogen ions. DuPont is participating in an FPG study to better determine likely emissions in landfill situations. It should be noted that **Kalrez® seals undergo extensive heat treatment in excess of 200°C during manufacturing prior to sale.** This minimizes residual non-polymeric PFAS (such as residual polymerization aids).

Data for incineration effectiveness of FFKM is not known. DuPont is participating in an incineration study with the ACC to have additional information on incineration.

In conclusion, the environmental emissions analysis for Kalrez® perfluoroelastomer parts reveals that expected PFAS emissions from EEA usage are estimated to be less than 0.375 kg per year. While estimating exact emissions is challenging, no more than 10% of emissions are fluorinated. **The findings suggest that no more than 0.05% of PFAS weight loss occurs before the seal requires replacement.**

¹⁴⁷ Directive 2008/98/EC & DIRECTIVE 2000/76/EC OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 4 December 2000 on the incineration of waste

5.4. Market impacts

In the oil and gas industry, a prohibition on the use of Kalrez® and Vespel® products would halt oil extraction in high-pressure and high-temperature environments, significantly limiting oil extraction. Kalrez® perfluoroelastomer parts are critical for reducing emissions in the petroleum sector, thereby also limiting the availability to reduce emissions in this sector.

Regarding the semiconductor manufacturing industry, which rely heavily on Kalrez® perfluoroelastomer parts, this would eliminate all semiconductor manufacturing in the EEA, limit innovations in the EEA, and potentially also the EEA's competitiveness in this sector. Without the use of Kalrez® perfluoroelastomer parts, the European Chips Act would not be possible due to the criticality of sealing elements in the chip manufacturing equipment. All the tools that are designed for chip manufacturing use a plasma environment at a high temperature and rely on aggressive chemistries, such as fluorine. These operations operate under a vacuum and require reliable sealing. **As a consequence of the potential restriction of Kalrez® perfluoroelastomer parts, the semiconductor chips which are found in microprocessors, including computers, smartwatches, mobile phones, and cameras could not be manufactured in the EEA. Therefore, EEA would need to rely on importing vital components and would not have the capability to manufacture them independently.**

Industrial and chemical processing applications would also be heavily impacted, as many chemical plants rely on Kalrez® perfluoroelastomer parts. **The proposed restriction would limit operations in the chemical processing industry in the EEA, affecting the production of numerous consumer goods that depend on the chemical industry, such as ethylene oxide.** Ethylene oxide requires FFKM and is one of the most important raw materials used in large-scale chemical production of many consumer and industrial goods: pharmaceuticals, lubricants, paint thinners, plasticizers, brake fluids, detergents, solvents, lacquers, paints, natural gas purification, detergents, surfactants, emulsifiers, and dispersants. Ethylene oxide is also a commonly used sterilization method in the healthcare industry.

In aerospace applications, if no derogations for the PFAS used in the applications is granted, aircraft would be unable to be serviced and new engines would not be able to be built. The current design and construction of air engines are based on the use of Vespel® parts and shapes and Kalrez® perfluoroelastomer parts. Engines are precisely engineered and controlled to ensure proper and safe functioning. Without Vespel® components, the metal-on-metal interactions would cause excessive vibration and higher levels of friction. This could lead to galling and metallic wear debris build up within the engine. Should this occur, it can be fatal to the engine, causing potential short circuits as well as locking components, resulting in engine failure. Kalrez® perfluoroelastomer parts are a high-performance material that was designed specifically as a sealing material for harsh thermal and chemical environments. It can withstand operating temperatures of up to 325°C and shows minimal swelling upon submersion in multiple oils such as HTS oils. AMS7257 specification covers FFKM. In addition, OEMs will typically only use materials which meet their own internal standards, which may exceed those of AMS7257 (reference aero SEA). Additionally, the growing demand for satellite and space applications, critical for wireless connectivity and national defence, relies on Vespel® parts and shapes unique performance under high vacuum and cryogenic conditions.

The transportation and automotive industry, relying on Vespel® parts and shapes, would face challenges as well. Manufacturers of various driveline components and OEMs would need to identify and qualify alternatives for existing systems such as transfer boxes, e-axes, EGRs, and turbochargers. This would require a significant amount of complex work, potentially involving subsystem redesigns in some cases. The impact on hydrogen transportation could be particularly significant, resulting in a slowdown of major projects aimed at developing hydrogen-powered transportation.

In terms of specific economic impacts to DuPont's business itself, it is expected that the impacts on lost revenues will be in the order of magnitude of billions of euros.¹⁴⁸ Yet, as DuPont believes that the impacts to downstream users will be significantly higher, DuPont has conservatively chosen not to monetize the impacts on their entity only.

5.5. Wider economic impacts

It is also important to consider the wider macroeconomic impacts and consequences on the EU society at large, by focusing on the expected consequences for the EEA market as a result of the proposed restriction. In particular, there are concerns on the overall EU trade balance and on the competitiveness of the EEA market due to the restriction of PFAS in Kalrez® perfluoroelastomer parts and Vespel® parts and shapes in highly demanding industrial operating environments.

Impacts on the market – Quality and costs

If PFAS were restricted, sectors relying on **Vespel® parts and shapes and Kalrez® perfluoroelastomer parts, all stakeholders and downstream users** would be heavily affected.

Kalrez® perfluoroelastomer parts

Particularly for FFKM, the development of new molecules with the same performance characteristics as the one currently available today is currently not technically available. Currently, alternatives do not exist. Therefore, the availability and quality of sealing parts in the EEA would be adversely affected because of the restriction.

Vespel® parts and shapes

Regarding Vespel® parts and shapes, for which part of the manufacturing takes place in the EEA, all investments currently made in manufacturing assets and future investments, existing Vespel® manufacturing assets will have no utility should a total PFAS ban be enacted. The majority of equipment installed in Mechelen's manufacturing facility is specially designed for customers in the EU region. Greater than 80% of Mechelen manufacturing supplies EMEA/EEA customers. Relocating investments outside of the EEA would incur significant costs to DuPont. Exiting of manufacturing from the EU will be detrimental to the EEA chemical industry (including oil and gas), transportation, and aerospace industries that need Vespel® parts and shapes that are manufactured in Mechelen. Not only

¹⁴⁸ Considering that in the aerospace, the impacts correspond to a reduction in revenue as a result of PFAS restriction in 2025 with an 18-month transition period will equate to lost revenues over the study period of approximately 33.7 billion to 33.9 billion EUR and lost profits of approximately 3.4 billion EUR.

would this reduce the flexibility of the EEA supply chain but would reduce the overall economic contributions of DuPont to the EEA.

Impacts on the market – Competitiveness

The potential restriction of PFAS, which applies equally to all producers when placing products on the EEA market under REACH Regulations, would place customers of PFAS containing Vespel® parts and shapes and Kalrez® perfluoroelastomer parts at a significant disadvantage compared to non-EEA competitors.

Impact on Kalrez® perfluoroelastomer parts

While the manufacturing of Kalrez® perfluoroelastomer parts takes place outside the EU, a considerable number of customers in the EEA import these perfluoroelastomer parts.

The most likely anticipated outcome for downstream users that are highly dependent on Kalrez® perfluoroelastomer parts are:

- For the EEA oil and gas industry, the most likely response of downstream customers is the ending of oil and gas extraction in high-pressure and high-temperature environments. Without access to Kalrez® perfluoroelastomer parts, oil and gas operations in the EEA would come to a complete halt due to a lack of current viable alternatives.
- For the EEA semiconductors industry, there would be a potential elimination of all semiconductor manufacturing in the EEA if a feasible alternative is not be found for Kalrez® perfluoroelastomer parts. Moreover, manufacturers will likely cease production and move outside the EEA.
- For the EEA chemical processing industry, as a result of the restriction, the CPI would most likely stop their operations. Most of the plants rely on fluoropolymer seals and Kalrez® perfluoroelastomer parts to comply with industry emission requirements. Moreover, manufacturers will likely cease production and move outside the EEA.
- Production of Hydrogen can be achieved through Methane cracking into Hydrogen and CO₂. Methane requires a refinery that uses FFKM seals for its producing. In order to offset the CO₂ emission, carbon capture can be put in place, which typically uses an amine-based process to capture the CO₂. FFKM are used to seal amines. Hydrogen can also be produced by electrolyser and FFKM seal can be used to seal the electrode as it gets at elevated temperature and in contact with water/steam. CO₂ capture, also called carbon capture, once isolated need to be reinjected under high pressure which therefore requires seal having good RGD.
- The aerospace industry would experience significant disruptions, impacting various sectors such as machine shops, engine system manufacturers, and airframe manufacturers. This is due to the industry's reliance on complex global supply chains that are tightly interconnected.¹⁴⁹ Any restrictions imposed on one part of the supply chain would trigger a chain reaction, ultimately leading to a cease of all downstream supply chains.

¹⁴⁹ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

Impact on Vespel® parts and shapes

Vespel® parts and shapes are produced and imported into the EU. A broad restriction on PFAS, including the ban on importing Vespel® parts and shapes which contain PFAS, would severely disadvantage highly demanding EU industries in the global market. Additionally, **a broad restriction of PFAS used in the production and manufacturing of Vespel® parts and shapes in the EEA would disadvantage EU markets in their competition with the rest of the world**, that would have access to a wider portfolio of products. This would impact multiple components in vehicles and the industrial producers that make those components.

The manufacturing of Vespel® parts and shapes located in Mechelen would shut down. A complete shutdown of this manufacturing facility would result in a decommissioning cost of the Mechelen manufacturing site amounting to approximately 20 to 25 M EUR. Any production that is currently exported from the EEA would be supplied by other regions.

The most likely anticipated outcome for downstream users would be highly dependent on the EEA industry's reliance on Vespel® parts and shapes:

- For the EEA oil and gas industry, the most likely response of downstream customers would be the ending of oil and gas extraction in high-pressure and high-temperature environments. Without access to Vespel® parts and shapes, oil and gas operations in the EEA would come to a complete halt due to a lack of current viable alternatives.
- If Vespel® products could not be manufactured and became limited in availability in the EEA, then the EEA transportation and aerospace industry would stop offering specific product lines and stop operations due to lack of alternatives.

As a result of the decreased competitiveness of the EEA market, **the attractiveness of the EEA for investment in innovation and R&D would severely be jeopardised, thereby posing a risk to ongoing multi-billion EUR investments that are currently being planned.** The investment initiative by Intel in Germany aimed at establishing two chip-making plants in Magdeburg as part of the Intel's expansion strategy in the EU could potentially face challenges and hinder the biggest foreign investments in German history as a result of the potential restriction. This investment has received government subsidies amounting to around 10 billion EUR.

A parliamentary question has also been addressed on exemptions from the PFAS restriction proposal for critical sectors.¹⁵⁰ Four Members of the European Parliament have, in a parliamentary question, addressed that PFAS are essential for applications in critical sectors, such as medical devices, pharmaceuticals, renewable energy, battery manufacturing, and semiconductors. They have stated that a far-reaching restriction would harm patient safety and jeopardize the green transition, and therefore questioned how the Commission would make sure that investments are not discouraged by the uncertainty generated by the proposal.

Impacts on the market – Trade (Kalrez® perfluoroelastomer parts and Vespel® parts and shapes)

¹⁵⁰ E-002394/2023. Available at: https://www.europarl.europa.eu/doceo/document/E-9-2023-002394_EN.html (Accessed in August 2023).

A broad restriction on would create a significant disadvantage for European companies in their global trade. Currently, the EEA heavily relies on Kalrez® perfluoroelastomer parts and Vespel® parts and shapes. If the import of Kalrez® perfluoroelastomer parts and the import and manufacturing of Vespel® parts and shapes in the EEA were to be restricted, it would force industries with demanding industrial operating environments dependent on these materials to cease their operations.

Any disruption in the availability of these essential Vespel® and Kalrez® materials could have severe consequences for the EEA's overall economy, in particular on the industrial operating environments within the EEA that rely on the two product lines.

5.6. Social impacts for the manufacturer: Unemployment

For details on this, please reference in the separate confidential attachment the section on continued use scenario (Section 8) and non-use scenario (Section 9) of the RPA (2023): Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, August 2023, Norwich, Norfolk, UK.

5.7. Cost-effectiveness ratio

A potential broad restriction would have disproportionate socio-economic implications on the EEA society. Overall, **the total socio-economic impact of a REACH restriction of PFAS for the aerospace applications only is monetised in the range of 33.8 billion EUR**, consisting of social impacts from unemployment in the EEA (i.e., production facility in Mechelen) and economic impacts (EBIT loss).

The estimates reported above should be considered as a minimum (lower boundary) of the expected impacts of a restriction of PFAS. The impacts cover only the impacts at the aerospace use level of Kalrez® perfluoroelastomer parts and Vespel® parts and shapes, not keeping into consideration all of the other industries (i.e., petroleum and mining, semiconductor manufacturing, chemical processing and industrial manufacturing, transportation, and military and defence) in which the products are also used. Moreover, it does not include the high costs to identify and establish an alternative for the suppliers and the overall industry.

Notably, the economic impacts downstream in the supply chain can be substantial. In fact, the socio-economic impacts typically follow a magnification effect along the supply chain so that the (downstream) manufacturers of finished products are expected to have substantially larger impacts. In other words, **the effects of a negative impact upstream would reverberate through the supply chain, causing larger negative output downstream.**

Taking into account the total estimated emissions of PFAS, which have been estimated at 2604 kg/year (see Section 5.2. and 5.3. on emissions for details), a theoretical full ban would be highly disproportionate.

Specifically for the aerospace industry, as described in the SEA, when considering DuPont's EU manufacturing, a non-use scenario would result in costs of 47.1 million EUR to 62.8 million EUR per kilogram of avoided PTFE emissions.¹⁵¹

This cost-effectiveness ratio can be compared with the benchmark of 50,000 EUR/kg, which is the threshold beyond which a restriction is clearly unproportionate and should not occur (Oosterhuis et al., 2017).¹⁵² This study is always referenced as a benchmark by SEAC in REACH restriction opinions for substances with environmental concerns (e.g., ED, PBT).

Therefore, in the case of a REACH restriction of PFAS, the cost per kg of avoided PFAS emissions is estimated to be higher than the threshold of 50,000 EUR/kg for all releases. Given this very conservative approach, DuPont's derogation requests may be justified by this cost-effectiveness ratio. The next section will further analyse additional socio-economic impacts that have been identified by downstream users.

The next section will further analyse additional socio-economic impacts that have been identified by downstream users.

5.8. Socio-economic impacts identified by downstream users

As stated above, whereas the monetization of impacts for DuPont's entity already illustrates an order of magnitude for the manufacturer itself, the downstream user and impacts on companies along the whole supply chain who rely on Kalrez® perfluoroelastomer parts and Vespel® parts and shapes are of a significantly higher order of magnitude. Table 17 below is aimed at providing an overview of the monetization of impacts for a variety of actors that rely on the aforementioned products, as far as this information is available publicly (e.g., from SEA or other documents submitted in the Public Consultation).

Table 15: An overview of socio-economic impacts by downstream users, going beyond DuPont.

Downstream user, company, or trade association	Socio-economic impacts
Aerospace ¹⁵³	Economic: The result of PFAS restriction in 2025 with an 18-month transition period will equate to total losses over the period June 2026 to 2030 estimated at over 550 billion EUR in the aerospace sector and adjacent sectors that rely on air transport.
European Sealing Association ¹⁵⁴	Social: ESA's members employ 12,500 people, of which 50% are in the manufacturing. These would all be impacted as a result of the restriction.

¹⁵¹ RPA (2023): Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, August 2023, Norwich, Norfolk, UK.

¹⁵² Oosterhuis, F., Brouwer, R., Janssen, M., Verhoeven, J., Luttikhuisen, C., 2017. Towards a proportionality assessment of risk reduction measures aimed at restricting the use of persistent and bioaccumulative substances. Integrated Environmental Assessment and Management, 13, 1100-1112.

¹⁵³ RPA, 2023. Socio-Economic Impact Assessment for the use of PFAS within the Aerospace Supply Chain, report for DuPont Specialty Products USA, LLC, June 2023, Norwich, Norfolk, UK.

¹⁵⁴ <https://www.esaknowledgebase.com/wp-content/uploads/2022/03/ESA-Position-Statement-on-proposed-PFAS-regulation-March-2022-1.pdf>

	Economic: ESA has over 50 members with a combined turnover of 2.6 billion EUR. In absence of PFAS, these business activities would negatively be impacted.
ProMinent GmbH¹⁵⁵	Social: With 2,800 employees in about 50 sales and service companies, as well as 11 production sites, who would be negatively impacted in absence of the absence of FFKM seals.
Nippon Pillar Packing Co., LTD¹⁵⁶	Social: Employment would be affected of at least 20,000 people as a result of the stopped functioning of European supply chains. Economic: The PFAS restriction would trigger an economic loss of approximately 63.4 billion EUR as a result of the stopped functioning of European supply chains.
Kronos TITAN GmbH¹⁵⁷	Social: 350 people are employed at the manufacturing facility. An additional 150 employees are from external companies. A PFAS restriction without an alternative would lead to closure of the production plant.
French Federation of mechanical engineering industries¹⁵⁸	Social: In France, 600,000 FTEs in employment would be affected. Economic: Entire industrial factor is affected, with an aggregate turnover of 146 billion EUR in France. 80% of the turnover is expected to be impacted because of the restriction.

¹⁵⁵ ECHA35, 6293

¹⁵⁶ ECHA35, 6317

¹⁵⁷ ECHA32, 6175

¹⁵⁸ ECHA32, 6203

6. OVERVIEW OF OTHER STAKEHOLDERS AND THEIR RELEVANCE TO THIS SUBMISSION

Other stakeholders and participants along the supply chain, of relevance to DuPont's Kalrez® perfluoroelastomer parts and Vespel® parts and shapes, have also indicated the importance of the use of PFAS in their submissions to this public consultation. Since DuPont's products are used by a variety of industries, this section is aimed at creating an overview of what other along the supply chain have stated in their submission, highlighting how the PFAS restriction would not only affect DuPont itself, but would have more significant implications further down beyond the supply chain.

Table 16: An overview of what other stakeholders and participants to the public consultation have been stating.

Contributor	Key message
European Sealing Association ¹⁵⁹	Requests exemption of fluoropolymers (Fluoroplastic & Fluoroelastomer materials) as they are manufactured using low molecular monomers and short chain intermediates . There is no other chemistry available to replace the performance that Fluoropolymers provide for chemical, thermal, plasma and radioactive resistance as seals. By definition any chemical that could withstand those situations would also be considered persistent.
Datwyler ¹⁶⁰	Provides fluoropolymer-based articles for all applications in research scope. "Currently there are no alternatives to Fluoropolymers. A replacement is only possible with significant compromises in functionality . In multiple cases functionality of the systems will not be given anymore with alternatives. Other materials can offer similar properties (not the same), but only for one of the multiple characteristics of FP (above mentioned)."
ViscoTec Pumpen - und Dosiertechnik GmbH ¹⁶¹	Currently, there are no viable substitutes in the global polymer market , particularly for fluoroelastomers, and only a few high-performance options like PEK/PEEK are available for seal applications. The company aims to adopt alternatives when feasible. However, this transition could impact around 90% of their global customers (approximately 3500 worldwide and 900 in Europe), leading to potential job cuts of about 150 positions (55% reduction) and sales losses totaling 40-60 million euros.
Held Technologie GmbH ¹⁶²	The proposal suggests that polymeric PFASs should be excluded from the ban or specified as an additional sector for machinery parts, considering their essential use under harsh conditions. Presently, there are no viable alternatives for fluoroelastomers like FKM, FFKM, FEPM, or PTFE due to limitations such as low maximum service temperatures and inadequate oil compatibility . The company, Held, is actively exploring alternatives through research, discussions with suppliers and manufacturers, and conducting compatibility and temperature tests.
Japanese Company ¹⁶³	While exploring substitutes for Polymerisation aid, it was discovered that non-PFAS materials frequently lack crucial performance qualities for specific polymeric PFAS types like FFKM. Additionally, these alternatives often do not fulfill various essential characteristics and ranges required for specific applications.
Austrian Company ¹⁶⁴	Seals and gaskets made from fluoropolymers have been widely used for decades in applications involving harsh chemicals and high-purity requirements, providing exceptional performance where other materials fail. The unique combination of

¹⁵⁹ <https://www.esaknowledgebase.com/wp-content/uploads/2022/03/ESA-Position-Statement-on-proposed-PFAS-regulation-March-2022-1.pdf>

¹⁶⁰ ECHA1, 3891

¹⁶¹ ECHA2, 3931

¹⁶² ECHA13, 4287

¹⁶³ ECHA3, 3960

¹⁶⁴ ECHA8, 4095

	temperature resistance, mechanical properties, and chemical resistance needed for such demanding conditions is currently irreplaceable by other polymeric products. The high cost of fluoropolymers reflects their exclusive usage in these critical applications where no viable alternatives with comparable performance are currently available.
German Company¹⁶⁵	Alternatives to fluoropolymers and fluoroelastomers are nonexistent in critical sectors like the chemical industry, construction, medical technology, and more. These materials are indispensable for applications such as chemically resistant barriers, liners, and linings, with no viable substitutes available, as confirmed by the chemical industry. Their usage is particularly essential in scenarios involving chemicals like phosphoric acid, hydrochloric acid, and silane, as well as in agricultural diesel plants. Imposing a ban on these fluorine compounds would result in severe supply shortages across Europe and hinder operations in crucial industries.
German Company¹⁶⁶	Chemical industry pumps commonly employ O-rings made of PFAS materials like Viton (FKM) or Kalrez (FFKM), or gaskets crafted from PTFE. No other material matches the universal chemical resistance of PTFE or FEP coated materials, making them irreplaceable options.
ITCO International Tank Container organization¹⁶⁷	ITCO recommends an ongoing exemption for solid-state fluoropolymers due to their exceptional characteristics, including crucial leak prevention and secure transport of hazardous materials, non-degradability, lack of viable alternatives with necessary chemical and temperature resistance , and potential for responsible disposal or recycling. The yearly usage of fluoropolymers in the tank container sector is estimated at approximately 73,500 kg, with Europe accounting for 24,500 kg and the rest of the world for 49,000 kg.
Wilo SE¹⁶⁸	Substituting with alternatives poses heightened risks for workers, users, and the environment, including leakage issues in facilities handling aggressive substances, increased danger of combustion in specific scenarios, and potential regulatory non-compliance due to conflicts with various regulations like energy efficiency, flammability, carbon footprint, renewable energy, ATEX, food and drinking water contact standards, and more.
German Hydrogen Association¹⁶⁹	At present, there are no fully developed alternatives for crucial components like PFSA ionomers in demanding applications such as fuel cells or electrolyzers, where only PFSA ionomers have achieved technological maturity. Non-fluorinated hydrocarbon polymer-based alternatives are still in their early development stage and not ready for commercial use due to inadequate technical parameters including performance, lifespan, and scalability.
Hydrogen Europe¹⁷⁰	The viability of non-fluorinated membrane concepts, while promising at laboratory and pilot scales, remains unproven on industrial scales and is hampered by immaturity, with their lifespan lasting only for a few dozen hours. This contrasts significantly with the required lifespan of over 25,000 hours for fuel cell applications. In the context of PEM electrolysis, the membrane support utilizing aromatic chemistries, like sPEEK, demonstrates inadequate durability. The identification of suitable chemistry to overcome this substantial challenge is crucial. If a suitable chemical solution were eventually found, deployment cycles would extend over a 10-year timeframe, inclusive of a 5-year demonstration period at a reasonable scale, effectively adding 15 years to the time needed for substance discovery . Despite some promising performance indicators of non-PFSA membranes, particularly hydrocarbon-based ones, their application in electrolyser contexts has failed to establish a trajectory toward commercial lifetimes exceeding 50,000 hours, particularly at relevant

¹⁶⁵ ECHA11, 4258

¹⁶⁶ ECHA16, 4372

¹⁶⁷ ECHA17, 4410

¹⁶⁸ ECHA13, 4302

¹⁶⁹ ECHA12, 4263

¹⁷⁰ ECHA9, 4144

	temperatures exceeding 79°C. Notably, the endurance of Nafion membranes, evidenced in confidential records, extends beyond 100,000 hours. However, the majority of non-perfluorinated alternatives have thus far achieved limited durations, with only a few approaching 1,000 hours, and none surpassing 10,000 hours.
Confidential¹⁷¹	All known candidates to replace FKM or FFKM do not show sufficient heat resistance and start to decompose at elevated temperatures (> 170 °C). Even the very high temperature resistant silicone elastomers cannot withstand combinations of aggressive media (e.g., engine oils, acids, organic solvents) and high temperatures and would swell significantly and consequently would lose its strength and elastomeric properties.
European Automobile Manufacturers¹⁷²	The automotive industry is a major downstream user of many PFAS, including fluoropolymers, fluorinated gases, and short-chain PFAS. Fluoropolymers are used for several key technical components, such as gaskets, hoses, joints, O-rings, seals, cords, cables, or sleeves. The current proposal does not acknowledge any derogations for such uses, whereas alternatives are not readily available and do not share sufficient properties to be qualified.
EuPC (European Plastics Converters) and EuMBC (European plastics Masterbatchers and Compounders)¹⁷³	In a recent survey we identified more than 44 applications not having readily available alternatives, the list not being exhaustive. For more than half of the respondent companies, their PFAS-related production represents 50% or more of their operations. Functions: Chemical resistance, lubrication, polymer coatings, processing aids – including mold release, resistance to oil/water, surface tension reduction, and additives in plastics.
EUROMOT - The European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers¹⁷⁴	EUROMOT members are end product users of PFAS substances and therefore rely on their suppliers to develop and provide PFAS-free alternatives. Alternatives investigated to date are not suitable for EUROMOT applications which are characterized by demanding environments with high contamination from dust and pollution, high temperatures and vibrations and presence of harsh chemicals. In these conditions, PFAS polymers are the only know materials with the technical characteristics to withstand those environmental conditions and guarantee reliability over the lifetime of the devices.

¹⁷¹ ECHA34, 6268

¹⁷² ECHA13, 4276

¹⁷³ ECHA33, 6206

¹⁷⁴ ECHA16, 4370; ECHA30, 6108

7. CONCLUSION

This analysis identifies the main potential negative consequences that the EEA society at large would face in the framework of the potential REACH restriction of PFAS used in Kalrez® perfluoroelastomer parts and Vespel® parts and shapes in demanding industrial operating environments. It has been performed in line with existing ECHA guidance under REACH.

Based on the evidence-based considerations, the assessment justifies the request:

- **A time-unlimited derogation (exemption from the proposed restriction) for fluoropolymers including FFKM (such as Kalrez® perfluoroelastomer parts), FKM, PTFE, and PFA in transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, energy, and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools),**
- **a 15-year derogation for fluorinated polymerization aids for PTFE micro-powder as a user of PTFE micro-powders with a review at 6 years after EiF to evaluate the research progress and extend the derogation, if necessary,**
- **a 15-year derogation for fluorinated polymerization aids for PFA as a user of PFA with a review at 6 years after EiF to evaluate the research progress and extend the derogation if necessary, and**
- **a 15-year derogation for fluorinated polymerization aids for FFKM with a review at 6 years after EiF to evaluate the research progress. This progress can be used to assess the societal value versus the risk and the progress toward finding alternatives to assess the likelihood of a needed extension beyond 15 years.**

If the exemption for the use of fluoropolymers, including perfluoroelastomers, is granted for industrial uses, then DuPont fully supports annual reporting requirements via a site-specific management plan to manufacturers of fluoropolymers in the EU and importers of articles which use fluoropolymers to gather data on the use of PFAs in industrial sectors and to monitor any developments/changes. DuPont agrees that the site-specific plan should include:

- **Information on the identity of the substances and the products they are used in;**
- **A justification for the use;**
- **Details on the conditions of use and safe disposal.**

DuPont agrees that the management plan shall be reviewed annually and kept available for inspection by enforcement authorities upon request.

The assessment concludes that a broad restriction without above mentioned exemptions in the transportation (including aerospace), petroleum and mining, chemical processing, semiconductor manufacturing, military and defence, energy, and industrial manufacturing (such as automotive manufacturing, textile, glass handling, scientific laboratory instruments, and industrial welding/plasma/cutting tools), related to Vespel® parts and shapes and Kalrez® perfluoroelastomer parts, will have disproportionate negative impacts on the EU's economy and society.

The above statement is founded on the following:

- **Industrial operating environments heavily rely on the use of Kalrez® perfluoroelastomer parts and Vespel® parts and shapes, which contain or depend on fluoropolymers such as PTFE and PFA.** These materials are essential for high-demand applications due to their unique combination of properties. The proposed restriction on PFAS **would prohibit manufacturing and use of Vespel® parts and shapes importing and use of Kalrez® perfluoroelastomer parts in the EEA until alternatives, if any, are found.**
- The analysis of alternatives concludes that there are currently no technically suitable nor economically feasible alternatives readily available to substitute Kalrez® perfluoroelastomer parts and Vespel® parts and shapes that contain PFAS providing comparable product performance benefits.
 - **For Kalrez® perfluoroelastomer parts, alternative materials do not offer the desired combination of thermal stability and chemical resistance for reliable sealing in critical dynamic and static applications. This then leads to issues such as leakage, process contamination and part failures.** In the case of in-kind alternatives (non-fluoropolymer elastomeric materials), their performance falls significantly behind the incumbent fluoropolymer. They are unable to meet the critical requirements of applications that demand high temperature, and/or high chemical resistance. While not-in-kind alternatives may offer similar heat and chemical resistance (e.g., metal), they lack the level of elastic resistance needed to properly seal in the demanding application, resulting in ineffective sealing, shorter life and overall poor-quality parts. **This poses safety risks and health hazards due to equipment failure.** In addition, their much higher stiffness would require a complete redesign of the hardware which translates into time, costs, and compromises to the overall integrity of the system.
 - For Vespel® parts and shapes, projects have been initiated to develop alternatives to PFAS in products such as replacing the PTFE micropowder that is used in direct-form parts. In all other Vespel® products that use PFAS, the fluoropolymer constitutes a large fraction of a part or purchased component, and therefore no alternatives exist. **For Vespel® parts and shapes, several alternatives were considered. These included bronze, Isostatic Vespel® shapes, as well as thermoplastics like PEEK and PAI.** However, both bronze and thermoplastics were deemed technically unfeasible for various reasons. Bronze had a higher coefficient of friction, necessitated redesigning other engine components, and added weight. Thermoplastics were unsuitable due to their inability to operate within the required temperature range. Isostatic Vespel® shapes, on the other hand, showed potential to fulfil some technical criteria in specific applications. However, it would not meet all requirements, particularly in high-temperature environments, where dimensional tolerance and coefficient of thermal expansion are critical to operation.

- If a suitable alternative for the fluorinated polymerization aids for Kalrez® perfluoroelastomer parts can even be found, the research and development (R&D) process for finding these non-fluorinated polymerization aids for Kalrez® is expected to take at least 15 years. The manufacturing sites for Kalrez® are located outside of the EU. Therefore, the primary impact of the potential EU PFAS restrictions would be discontinued use of Kalrez® perfluoroelastomer parts in EU industries that rely on these high performance perfluorinated elastomers today.
- Without any derogation related to PFAS used in Vespel® parts and shapes in the applications, the primary impact of the potential EU PFAS restrictions would be no importation of these products into the EU for the key industries. The industries these products support would not be able to continue operations. In the case of a complete shutdown of operations in the EEA, the Mechelen manufacturing facility would close. As a result, during this period, the supply of Vespel® direct formed products to the industries currently served by Mechelen would cease completely.
- As a result of the potential broad restriction for FFKM and fluoropolymers used in Vespel® parts and shapes, the aerospace industry, including commercial flights into and out of the EEA will cease, impacting travel and shipping, which will also impact industries that rely on those industries. **It is expected that complete substitution in the aerospace market will take more than 30 years in the components where PFAS can be removed due to lengthy qualification times.**
- Electric vehicles demand critical light weighting to maximize vehicle range. Using Vespel® bushings enables motor and drive systems that do not rely on heavy and resource intensive lubrication systems.
- Vespel® CR products reduce environmental emissions in the chemical industry as well as the petroleum and mining industry. Where used, Vespel® parts and shapes increase the reliability and safety, and lowers the cost of ownership of industrial processes. Restricting the use of Vespel® products will reduce EEA competitiveness, and result in an increase in industrial accidents with corresponding loss of life and environmental pollution.
- Additionally, the proposed restriction on the use of PFAS, **in particular of fluoropolymers would prohibit the manufacturing of Vespel® parts in the EEA and importing PFAS-containing Vespel® parts and shapes. The import of Kalrez® perfluoroelastomer parts in the EEA would also be prohibited.** A large number of EEA industries rely on Vespel® parts and shapes and Kalrez® perfluoroelastomer parts in their industrial operating environments, such as the oil and gas industry, electrical engineering, aerospace, chemical processing, and transportation sector which would all be halted. **A full PFAS ban would eliminate the ability to supply into the market for these high performing materials within the EEA. This would have dire consequences on industrial operating environments that rely on these products.**

- From an EEA macroeconomic standpoint, the broad restriction of critical fluoropolymers in the EEA will have significant impacts on the competitiveness of the EEA markets in the industrial operating environments, on competition in the EEA, on innovation, and on the overall EEA trade balance. Since many fluoropolymer applications are used to reduce chemical emissions, restricting the use of fluoropolymers would make meeting environmental emissions goals difficult to impossible. A broad restriction of PFAS used in the production and manufacturing of Vespel® parts and shapes in the EEA would put EU markets at a disadvantage in competition with non-EEA markets, as EEA companies would no longer be able to provide the product to customers outside the EEA, while the rest of the world would have access to a wider portfolio of products. The 'wider economic impacts' section (4.3) provides a discussion on the wider macroeconomic impacts and consequences on EU society at large.

ANNEX I

Table 1: Non-exhaustive list of DuPont™ Vespel® products.

Product	Properties
Vespel® SP-1	- For physical and electrical properties - Superior wear, maximum strength and elongation - Minimal electrical and thermal conductivity - Low outgassing with high purity
Vespel® SP-3	- For unlubricated sealing and low wear in vacuum or dry environments - Maximum wear and friction resistance - Ultra-low outgassing
Vespel® SP-21	- For balanced low wear and physical properties - Low-friction properties work with or without lubrication - Long elongation and high stiffness - A graphite-filled polymer
Vespel® SP-211	- For low coefficient of friction and unlubricated wear - Lower coefficient of friction even without lubrication than SP-21 - Excellent creep resistance
Vespel® SP-22	- For low wear and dimensional stability - Enhanced resistance to wear and friction - Minimal thermal expansion - Oxidative stability
Vespel® SP-202	- For electrical conductivity with low wear rates - Electrostatic charge removal - Maintains tolerances in high heat and through multiple cycles
Vespel® SCP-5000	- For strength and hardness - Chemical resistance over broad temperature range - High wear resistance with low outgassing and high purity - Thermal oxidative stability - Very low hydrogen permeation
Vespel® SCP-5009	- For high temperatures and excellent compressive strength - Lower coefficient of friction without lubrication - Excellent sealing capability
Vespel® SCP-50094	- For high temperatures and wear resistance - Superior wear under high pressure and/or velocity - Thermal oxidative stability
Vespel® SCP-5050	- For high temperatures, wear resistance and exceptional coefficient of friction - Coefficient of thermal expansion similar to steel; matched to SS 316L at high and at cryogenic temperatures - Exceptional thermo-oxidative stability
Vespel® CR-6100	- Provides excellent widespread chemical resistance for applications in refineries or chemical processing - CTExy is matched to steel - PFA matrix provides lubrication for dry wear resistance in pumps.
Vespel® CR-6110	- Provides excellent chemical resistance for wafer holding in semiconductor manufacturing
Vespel® CP-0664, ASB-0664, ASB-0670	- Thin sheet composite providing low sliding resistance for aerospace applications. - Provides excellent resistance to vibrational wear even in dirty environments. - Used in thrust reverser systems, composite fan blade systems, and around the engine nacelle and wing mounts.
Vespel® CP-0644, CP-2014, CP-2015, CP-8000, CP-8007	- Fluorine containing polyimide/carbon fibre braid composite. - High strength, high temperature bushing, and washer applications.

CP-8001, CP-8003, CP-2103	- Fluorine containing polyimide/carbon fibre braid composite.
CP-0653, ASB-3000	- Fluorine containing polyimide/carbon fibre braid composite with fabric liner for Aerospace
CP-0652, CP-0826, CP-0866	- Various Liner composite grades for Aerospace
CP-0630	- Composite liner for industrial and transportation

Table 2: Non-exhaustive list of DuPont™ Kalrez® products.

Product	Properties
Kalrez® Spectrum™ 6375	- Black - +275 °C - Broad chemical and temperature, multi-purpose
Kalrez® Spectrum™ 7075	- Black - +327 °C - Highest temperature, low compression set
Kalrez® 4079	- Black - +316 °C - Low compression set
Kalrez® Spectrum™ 7375	- Black - +300 °C - Broad chemical and water/steam resistance
Kalrez® Spectrum™ 6380	- Cream - +225 °C - Hot amines (>80°C), chlorine dioxide, ethylene dioxide
Kalrez® Spectrum™ 0040	- Black - +220 °C - Lowest service temperature, O-rings
Kalrez® Spectrum™ 7275	- Light brown - +300 °C - Ethylene oxide, acrylic acid, chlorosilanes
Kalrez® OG193	- Black - +250 °C - Best RGD resistance, custom parts, chemical resistance
Kalrez® 0090	- Black - +250 °C - Best extrusion resistance, good RGD resistance, hot water, amines, bases
Kalrez® Spectrum™ 7090	- Black - +325 °C - Low compression set, high temperature
Kalrez® 7390	- Black - +300 °C - Broad chemical and temperature, multi-purpose
Kalrez® W240UP	- Black - +230 °C - Chemical and thermal stability, resistance to acids/bases
Kalrez® 9600	- Olive-green - +315 °C - Best chemical resilience (to Ammonia, Ozone, and Water Vapor) in compression and ultra-low outgassing at high temperature conditions

Kalrez® 9500	- Tan - +310 °C - Best thermal stability, very low outgassing and excellent mechanical strength
Kalrez® 9300	- Brown - +300 °C - Best resistance to oxygen and fluorine-based plasma and etch process chemistry, very low metals content, excellent thermal stability and mechanical strength
Kalrez® 9100	- Amber - +300 °C - Thermal stability, very low outgassing, excellent elastic recovery, good mechanical strength properties
Kalrez® 8002	- Clear - +275 °C - Best resistance to dry process chemistry, good mechanical strength
Kalrez® 8705	- Black - +327 °C - Best resistance to high concentrations of damaging oxygen free radicals, great sealing functionality in high temperature vacuum applications
Kalrez® 8900	- Black - +325 °C - Great thermal stability, very low outgassing and excellent (low) compression set properties, excellent mechanical strength
Kalrez® 8575	- White - +300 °C - Best thermal stability and long-term sealing performance, less Infrared (IR) absorption and significantly reduced outgassing properties at elevated temperature, good mechanical properties
Kalrez® 7075UP	- Black - +327°C - Best thermal stability, very low outgassing, great seal force retention, good mechanical properties

Table 3: Suitability of Kalrez® form by grade for Oil & Gas products only.

Kalrez® grades	O-ring	T-seal	Packer	S-Seal	V-ring	Chevron stack	Boot	X-ring	Metal bonding
OG193	✓	✓	✓		✓	✓			✓
0090	✓	✓			✓	✓		✓	✓
7390	✓	✓			✓	✓		✓	
7375	✓	✓		✓	✓	✓	✓	✓	
6375	✓	✓							✓
0040	✓								
3065					✓	✓			

Table 4: Vespel® selection guide by application, for automotive applications.

Typical applications	Component	SP-1 Maximum strength and elongation	SP-21 Enhanced wear resistance	SP-22 Maximum creep resistance	SP-2515 Match aluminium's CTE	SCP-5050 Lowest CTE	SCP-50094 Highest PV limit
Tranmissions (xEV & ICE) Variable valve timing Hydraulic motor	Seal ring 		✓	✓	✓		
Transmissions (xEV & ICE) Differential unit Lubricated clutch system	Thrust washer 		✓		✓		✓
Emission system (EGR, Turbocharger) Solenoid valves	Bushing 			✓	✓	✓	
Electrical motors (window lift, wiper, seat, sunroof)	Thrust plug 	✓	✓				
Transmission (xEV & ICE) Variable valve timing	Aluminium wear and friction 		✓		✓		
Chain guide Shift fork pad	Wear pad 	✓	✓				
Hydrogen valve seats	Hydrogen seal 	✓				✓	



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