



Comment on Restriction proposal on Per- and polyfluoroalkyl sub- stances (PFASs)

22. september 2023

Introduction

The Danish Plastics Federation is an industry organization covering some 300 member companies from across the plastics value chain and employing approximately 30.000 people. Far the majority of our member companies belong to the manufactory industry and are as such, for a large part, dependent on PFAS in their production equipment.

Our members produce a variety of products and technologies aimed at diverse sectors such as renewable energy, medical equipment and food contact material.

PFAS should be substituted where possible

In summary, the Danish Plastics Federation fully supports the objective of the restriction proposal aimed at avoiding emissions of PFAS to the environment. We encourage a restriction on PFAS in consumer products and substitution where possible, and we stress the importance of recognizing the time for research and development in order to find suitable alternatives to PFAS and thus realistic transition periods.

Following the announcement of the PFAS restriction proposal early 2023, we have had a close consultation with our members on the subject in order to get an overview of the use of PFAS as well as to shed light on where PFAS can or cannot be substituted. In this process we have held webinars, disseminated questionnaires, one-to-one dialogues as well as site visits at member companies. Members have been encouraged to contribute with their insight to the various European networks and organizations within their field.

The following comments will focus on the cross-sectoral issues connected to the PFAS restriction proposal with emphasis on fluoropolymers and elastomers and will thus not go into detail on specific uses and applications.

The critical role of fluoropolymers in the plastics industry

Fluoropolymers and fluoroelastomers are critical elements in an industrial production. As an example, polytetrafluoroethylene (PTFE) is used in plastic compounds due to their low friction, chemical resistance, electrical insulation, high temperature, flame retardancy, chemical inertness, etc. which makes them difficult to replace in many cases.

In other applications fluoropolymers are considered irreplaceable due to outstanding chemical resistance and are hence difficult to substitute.

Fluoropolymers are being used in a variety of essential components for such applications as heating for buildings and district energy and include substances such as PTFE, FEPM, PVDF and PFA.

The main concern raised in the restriction proposal for PFAS is the very high persistence and potential accumulation in the environment and in humans. However most industrial uses of fluoropolymers will not lead to emissions in the use phase. Likewise, the exposure of PFAS to the environment can to a large extent be avoided by establishing suitable waste handling processes.

Sufficient time for transition

The restriction proposal sets out different time frames for the substitution of PFAS dependent on the specific application and available alternatives. The longest transition period for finding alternatives to PFAS is in the range of 12 years + 1½, however in reality it is not possible to find alternative technological solutions, including time for testing and implementing in the production within this time frame.

Companies exploring new production facilities will plan many years ahead, and thus need much longer time frames when considering, that the given technology has yet to be developed. PFAS are generally used owing to their strong resistance to harsh environments, they will not be possible to replace with other substances having the same characteristics. As a consequence, valid alternatives for several applications of PFAS are expected to be developed over the next 10-20 years for specific uses, which cannot be planned while building new production sites. Adding to this, there is a risk of substituting PFAS with other substances with the same or worse effects on the environment and humans.

Concluding remarks

In conclusion, we would like to emphasize that the Danish Plastics Federation strongly supports a regulatory approach for industrial use of certain PFAS, especially fluoropolymers and fluoroelastomers, which are essential for the production environments. Where alternatives do not exist, sufficient time is needed for the transition period in order to find the right alternatives and to ensure the future investments in European production facilities.

Finally, we would like to mention that we and our member companies are fully available for further questions or comments, should this be relevant.

Kind regards,

Christina Busk

Head of Environment, Danish Plastics Federation

■@plast.dk – 3330 8630