

From: GROW F1
Sent: lundi 20 juin 2022 14:50
To: [REDACTED] GROW)
Subject: FW: Meeting with PlasticsEurope on PFHxA - 14/06/2022

Online meeting with PlasticsEurope on PFHxA restriction, 14/06/2022, 16:00-17:00

Participants

Automobile Manufacturers' Association (ACEA): [REDACTED]
European Tyre & Rubber Manufacturers Association (ETRMA): [REDACTED]
European Association of Automotive Suppliers (CLEPA): [REDACTED]
Fluoropolymers Product Group of Plastics Europe (FPG): [REDACTED] (Daikin), [REDACTED]
(Plastics Europe), [REDACTED] (AGC)
GROW.F1: [REDACTED], [REDACTED], [REDACTED]

GROW.F1 introduced the meeting by highlighting that the Commission received in May the compiled RAC and SEAC opinion on the restriction dossier on PFHxA, its salts and related substances. The Commission is still in the process of analysing this complex restriction dossier and internal discussions are at an early stage.

1. Threshold and scope of the restriction

FPG recalled that fluoropolymers are not in the scope of the restriction, but PFHxA and related substances are used during manufacturing process, but they remain as impurity in final fluoropolymers. It is important for enforcement that the decided thresholds apply to all fluoropolymers, without distinguishing the end use. During the consultation on the SEAC draft opinion, FPG proposed as thresholds 500 ppm for PFHxA and 2500 ppm for PFHxA related substances.

FPG stressed their availability to provide more information to justify the proposed thresholds. GROW.F1 noted that they will assess the information available in the opinion, and submitted during the consultations and will get back to FPG if additional information is required, specifying which type of information is needed in addition to what already submitted.

2. Analytical methods and enforceability of the restriction

ETRMA stressed that there is no public analytical method available to measure concentrations in rubber, which will make it difficult for rubber companies (many of which are SMEs) to comply with the restriction. FPG added that PFHxA is easy to analyse in water but not in other matrices. GROW.F1 noted their attention to the issue of enforceability and analytical methods is of a more general nature. GROW.F1 also recalled a specific survey prepared by ECHA on analytical methods and the Forum advice, which will be taken into account when drafting the restriction proposal.

3. Spare parts

CLEPA, representing automotive manufacturers but also original equipment manufacturers, requested a general derogation for spare parts during the consultation on the SEAC draft opinion but noted that such derogation has not been recommended by SEAC. CLEPA also requested a derogation period of 7 years for new vehicles parts for passenger vehicles and 12

years for other vehicles. The proposed higher thresholds for fluoropolymers, requested by FPG, would not cover these uses. The derogation proposed by SEAC covers only engine applications for safety.

4. Communication requirements

GROW.F1 noted the SEAC recommendation to have communication requirements within the supply chain, but could not share more information on the issue at this stage.

5. Transition period

GROW.F1 noted that the Dossier Submitter and RAC recommended a 18-month transition period, while SEAC recommended a 36-month transition period, but there is no indication yet on which will be the final transition period proposed.

6. Timeline and next steps

GROW.F1 recalled that the combined RAC-SEAC opinion in May 2022 and that the Commission is in the early phase of internal discussions.