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COMMENTS FOR ANNEX XV RESTRICTION REPORT

Use of PFAS in textile products:

As a subsidiary of the Würth Group, we are particularly affected by a PFAS restriction. A large number of workwear items currently contain PFAS in order to offer the best possible protection against external influences in the demanding everyday working environment, be it on construction sites, in shipping or in rescue operations.

Due to their thermal and chemical stability, fluorocarbons are found in a wide range of applications - including as finishing agents in the textile industry. In particular, textile auxiliaries and finishing chemicals, which are intended to ensure a water-, oil- or dirt-repellent function on the textile surfaces and/or products, contain fluorocarbons. According to the current state of the art, only fluorocarbon finishes have a long-lasting effect. Fluorine-free alternatives cannot currently ensure this effect in the same quality over the long term. Today, fluorine-free alternatives are already increasingly used for everyday clothing, and it is consciously accepted that reworking (e.g. reimpregnation) may be necessary during use. However, especially in personal protective equipment and protective clothing, finishing chemicals containing PFAS are still used today, since the first priority here is to be able to guarantee a long-lasting protective effect for users.

The restriction proposal takes this into account by granting long transition periods for the substitution of finishing chemicals containing PFAS. Although these long transition periods are certainly helpful in the transition process, it must be noted that many PFAS-free alternatives that will be needed in the future are not yet available. Therefore, there might be a risk that alternatives will not be available on the market soon.

It would be conceivable if this aspect were considered.