



Öppen/Unclassified BREV

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Response on REACH PFAS restriction proposal - Meeting KEMI & Armed Forces Materiel Administrations

Swedish Defence Materiel Administration (FMV) would like to thank Swedish Chemical Agency for the opportunity to participate in the 2nd Consultation regarding PFAS-restriction in TULAC.

There are certain items that FMV consider essential to exempt from the PFAS-restriction, due to the need for oil repellency in e.g. combat or CBRN-uniforms. Oil repellency has an important role in flame protection as well in CBRN-protection. A restriction could cause decreased level of protection.

See appendix below for examples of items where the oil repellency is considered essential today. Depending on the future need of the Swedish Armed Forces, items can be added to or subtracted from the list.

FMV would also like to highlight that military uniforms are not considered Personal Protective Equipment (PPE) in regards to regulation (EU) 2016/425.

Procurement

FMV are not always aware of all types of PFAS that the suppliers are using in the items that are procured. However one PFAS that is known to treat some textiles is a fluorinated acrylic copolymer with no CAS-no assigned.

FMV also strive to forbid the Contractor to use PFAS when it is considered possible (i.e. no need for e.g. oil repellency).

Use

Very few CBRN items are used in a year. In regards to CBRN items, the items (or rather function) are single-use and the usage time is low (less than 24h). Hence, the PFAS emission is considered extremely low. The items are also stored in air-proof bags, so there can be no emission during shelf-life.

No tests regarding PFAS emissions from regular combat uniforms have been conducted. However, it could be assumed that the emission is similar to emission of high performance outdoor-wear.

Washing

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The majority of laundry is conducted by professional laundry establishments. A minor percentage of Swedish Armed Forces personnel wash their uniforms at home.

The frequency of re-impregnation is not known at this time. At the moment two types of re-impregnation agents are used, "Saprit protect" and "Osmafin Aquablock Triple".

End-of-life

CBRN items are incinerated after use at a waste treatment plant.

The regular combat uniforms and related items are used as long as possible. There are examples that some uniforms are from 1994. When the uniforms are deemed as not suitable for use, they are sent to a waste treatment plant to be incinerated.

In general, the items are incinerated soon after they have reached the waste treatment plant, since a "verification of destruction" should be signed by the waste treatment plant.

Departments of Soldier Equipment (Log G SU), CBRN (Arme HCH), Field camp systems (Log G Fä MI) Medical Care (Log G Sjä) and Operation Support (Log V Metod) at FMV as well as Department of Sustainability (LEDS TF Hållbarhetssektionen) at Swedish Armed Forces have contributed to the response.

Appendix:

- C- combat uniform
- Regular combat uniform
- Carrying system
- Combat vest

Sincerely,

Marvin Lifbom

C Operation Support