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Comment on Proposed Restriction of Per- and polyfluoroalkyl substances PFAS

1. Introduction

Circor International Pumps is a provider of mission critical flow control products and services for the Industrial and Aerospace & Defense markets. The Pumps are essential for many applications in daily life, such as transport of drinking water and wastewater, production and packaging of food and beverage, production processes within chemical and pharmaceutical industry, processes in oil and gas, pulp and paper, mining and metals, heating, ventilation, and air conditioning applications. PFAS materials in our pumps are used, primarily for functions such as seals and inserts. Their remarkable attributes encompass exceptional chemical resistance, thermal stability, and a low coefficient of friction. PFAS materials are exclusively employed in scenarios where no viable substitute is currently accessible.

Circor International Pumps has significant concerns about the proposed broad restrictions on the use of PFAS. The prohibition of PFAS components like polymers in pumps could potentially create unpredictable risks to the reliability and safety of many applications. Replacing PFAS with other materials that may be less suitable or completely unsuitable could result in rapid failures and leaks, posing the risk of releasing aggressive, toxic or high-temperature substances that could potentially harm humans and the environment. In addition, it is imperative to recognize that the use of PFAS in pumps is limited to professional and industrial settings where the proper handling, use and disposal of these products can be effectively controlled.

It would be as exaggerated as it would be unjustified. After all, a whole series of PFASs, the so-called "polymers of low concern," are not a danger to the environment according to the OECD and must therefore be exempt from a ban. <https://www.oecd.org/env/ehs/risk-assessment/42081261.pdf>

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The implementation of product labeling for items containing PFAS could serve as a first step to improve collection, recycling, and responsible disposal processes. Such labeling should be tailored to ensure the safe management of these products.

2. Importance of pumps for health and society

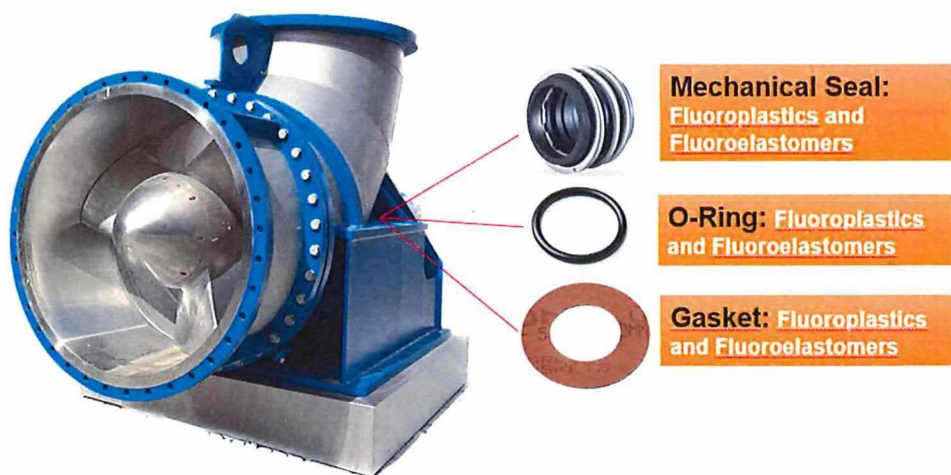
The process of liquid transportation is essential for the efficient functioning of various aspects of life. Additionally, looking towards the future, these systems will also be instrumental in facilitating the green transition including geothermal energy and green gases.

PFAS materials are used in pumps to improve functionality and achieve higher performance and safety. Component and product life has been extended and maintenance intervals reduced, improving overall resource efficiency.

3. Essential functionalities in pumps

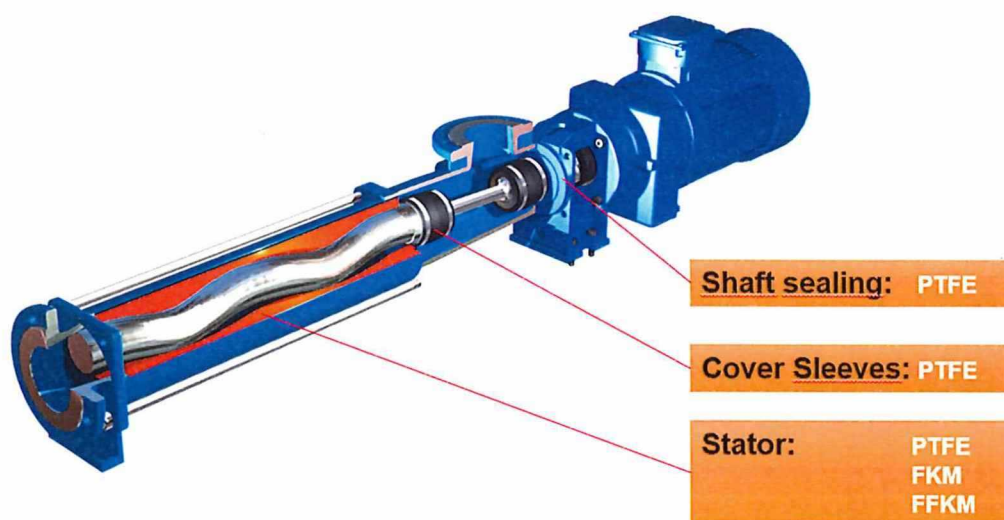
3.1. Sealing

One of the major components of a pump are sealings. For special applications where thermal and chemical resistance, abrasion and wear resistance is required PFAS materials are used in mechanical seals, O-rings, and gaskets. For a more comprehensive and detailed technical overview, you may refer to the position paper released by the *European Sealing Association (ESA)*, titled "*European Sealing Association (ESA) stance on the European proposal for PFAS regulation concerning the Sealing Industry*" <https://www.europeansealing.com/about-us/position-statements/>



3.2. Stator and collar of progressive cavity pumps

The working principle of a progressive cavity pump, is based on an eccentric screw (rotor) and a rubber-based stator. The rubber is a key component for the pump. The majority of applications require a high-performance stator, typically made of polymeric materials such as PTFE, FKM, or perfluorinated elastomer (FFKM). This choice is necessitated by the exceptional chemical resistance required, especially in demanding operating conditions, which is the predominant requirement for most of our customers.



4. Conclusions

In some pump applications, the use of PFAS is still essential for safety, efficiency and functionality. Fluoropolymers are according to the OECD polymers of minimal concern. Their properties are fundamentally different from many of the other PFAS molecules targeted for restriction in the current proposal.

Therefore, we respectfully request that they be excluded from the current proposed restriction. Their inclusion could potentially lead to significant unintended consequences for both industry and society in the EU.

In particular, we request exemptions for Fluoroplastics like Polytetrafluoroethylene (PTFE) and Fluoroelastomers like Fluorocarbon-based Fluoroelastomer Materials (FKM) and Perfluoroelastomer (FFKM).

For the safe handling of products containing PFAS, the introduction of labeling could be a first step to improve collection, recycling and responsible disposal.

Yours sincerely,

Gunter Connert



Managing Director

Michael Leutner



Product Compliance