



November 1, 2022

Subject: Response to Request for PFAS-Related Information

3M™ PFA

Dear Valued 3M Customer,

This letter is in response to your question concerning Per- and polyfluoroalkyl substances (PFAS) and whether they are present in the products listed above.

3M does not intentionally add to the product composition or use in the manufacturing process Perfluorooctanoic acid (PFOA), Perfluorooctanesulfonate (PFOS), any higher molecular weight homologues, or any derivatives or salts of these materials, in the manufacture or formulation of its products. However, even when these substances are not intentionally used in the manufacturing or processing of a product, they may still be detected at trace quantities as unintended impurities.

Regulation (EU) 2020/784 amended Annex I of Regulation (EU) 2019/1021 of the European Parliament regarding the listing of PFOA, its salts and PFOA-related compounds. As of July 4, 2020, PFOA is prohibited as an unintentional trace contaminant (including unintended impurities as described above) in substances, mixtures and articles at levels of greater than or equal to 25 ppb in the European Union.

Regulation (EU) 2020/784 Restriction for PFOA was published without an analytical method associated with it. 3M developed and published the following analytical method, which was carefully designed with quality management and calibration in mind, but it is still experimental:

<https://multimedia.3m.com/mws/media/1356771O/3m-standard-method-for-pfas.pdf>

Based on this analytical method, 3M tested representative lots of fluoropolymers, based on 3M's rigorous quality management system, for the product listed above and consistently determined the samples to be below 25 ppb of PFOA.

Further, these products are in conformance with the EU restrictions for PFOS under EU 2019/1021 as amended by Commission Delegated Regulation EU 2020/1203.

In the event a 3M Advanced Materials Division product is proven not to conform with 3M's applicable product specifications or the information above, then, to the extent permitted by law, 3M's entire liability and customer's exclusive remedy, will be at 3M's option either: (i) repair or replacement of the non-conforming product with a conforming product; or (ii) refund of the purchase price paid by customer for each non-conforming product, within a reasonable time after written notification of said non-conformance and return of the affected product to 3M. 3M shall

not under any circumstances be liable for direct, indirect, incidental, special, or consequential damages (including but not limited to loss of profits, revenue, or business) related to or arising out of this letter or the referenced product(s), including the use, misuse, or inability to use such product(s). Unless stated otherwise in a writing signed by 3M, the foregoing language cannot be waived, modified, or supplemented in any manner whatsoever.

The information provided in this letter related to material content represents 3M Advanced Materials Division's knowledge and belief as of the date it is provided, which may be based in whole or in part on information provided by suppliers to 3M. 3M makes no recommendation about the suitability of its products in the user's intended application. It is the user's responsibility to determine whether its use of 3M products in a particular application is suitable and will comply with applicable laws and regulations.

Thank you for using 3M products. Please contact me at [REDACTED] [@mmm.com](mailto:[REDACTED]@mmm.com) if there are any additional questions.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Bjorn Gangeness', with a stylized, flowing script.

Bjorn Gangeness
Regulatory Affairs
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