



EUROPEAN COMMISSION
INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP AND SMEs DIRECTORATE-GENERAL
Consumer, Environmental and Health Technologies

REACH

Brussels, 21/12/2017

Meeting with FluoroCouncil 6 December 2017

Participants

- [REDACTED], Chemours
 - [REDACTED], Daikin Chemicals
 - [REDACTED], Archroma
 - [REDACTED], AGC Chemicals
 - [REDACTED] Kreab
- For DG GROW: [REDACTED] (D1)

Background

FluoroCouncil is the global industry association representing the leading manufactures of Fluorotechnology.

FluoroCouncil requested the meeting to discuss the availability of analytical methods pursuant the REACH PFOA restriction¹ which will entry into force on 4 July 2020 and that sets a limit of 25 ppb for PFOA and its salts and 1000 ppb for one or a combination of PFOA-related substances, in other substances, mixtures or articles.

Recital 12 of the REACH PFOA Restriction refers to an existing CEN standard analytical method on a similar substance (PFOS) which likely can be adapted for the analysis of PFOA. Furthermore, adaptation of the method to the extraction of other matrices would likely be needed..

Summary of the meeting

The representatives of FluoroCouncil made a presentation on fluorotechnology: fluotelomer-based products such polymers and surfactants and fluoropolymers such as fluoroplastics and fluoroelastomers. These latter being the main applications of PFOAs by industry due to the material properties conferred to the articles like chemical resistance, thermal stability and resilience. Examples of applications are: breathable membranes, aerospace materials, hydraulic tubing, chemical processing, semiconductor manufacturer...

FluoroCouncil highlighted the complexity of the analytical methods needed to enforce the restriction. In particular the extraction phase considering the wide variety of materials that may contain PFOAs. The methods should be applicable to the largest possible scope of products and not too bee too expensive. They explained that they are already required by their clients to provide them with materials in compliance with the restriction. Harmonised methods are needed as they could sell their materials as "compliant" and then being tested with another method in another lab and the result is not compliant.

CEN/TS 15968:2010 is available for the determination of extractable PFOS. However there is no developed standard method for PFOAs.

¹ COMMISSION REGULATION (EU) 2017/1000 of 13 June 2017 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) as regards perfluorooctanoic acid (PFOA), its salts and PFOA-related substances

FluoroCouncil asked whether the COMM was planning to contact CEN to develop a standard and offered their support in the process.

The COM representatives welcomed the initiatives from industry to develop analytical methods to improve the enforceability of the restriction. The COMM has no intention to give a mandate to CEN but encouraged FluoroCouncil to contact CEN directly to take the lead in the process.

The COMM explained that the compendium of analytical methods published by the FORUM includes the state of the art methods for the enforcement of the REACH restrictions. Once there is a method available it can be included in the compendium, even if this is not binding enforcement authorities use the compendium as a guide for the analytical methods.

COM suggested that industry should seek contact to the Forum early on to discuss the planned development of an analytical method. COM said it could provide support in making contact to the Forum, if needed.

[REDACTED]