



EUROPEAN
RESILIENT FLOORING MANUFACTURERS'
INSTITUTE

ERFMI vzw
Rue Montoyer 24
B-1000 Brussels
Belgium
Tel.: + 32 2 2 87 08 71
Tel.: + 32 2 2 87 08 72
GSM: +44 7375553948
[REDACTED]@erfmi.com
www.erfmi.com
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Response from the European Resilient Flooring Manufacturers' Institute, ERFMI, to the ECHA consultation on a proposed restriction on the manufacture, placing on the market and use of PFAS.

About ERFMI

The European Resilient Flooring Manufacturers' Institute, ERFMI, represents 15 manufacturers of resilient flooring in Europe. ERFMI supports the preparation of international standards and specifications and works with its members to further the development of a circular economy for floorcoverings. Our members' products are used in both commercial and domestic applications and are made of PVC, rubber, linoleum, cork and as well as a range of other polymeric materials. Our members in total employ more than 11,000 people across Europe and place more than 360 million m² of resilient floor covering per year on the market in geographical Europe.

As a European association representing the European resilient floor coverings industry, ERFMI has in-depth technical, practical and scientific knowledge of the PVC flooring industry in the EU. Please see <https://erfmi.com/> for further details.

General impacts caused by the proposed concentration limits.

PFAS is not intentionally added to Resilient flooring products placed on the market by our members. However the restriction states that even if a company itself does not use PFAS in its products, it may be required to demonstrate compliance with PFAS restrictions to regulators. This will involve documentation and more importantly testing to **ppb** which is incredibly costly and could have a considerable impact on the viability of flooring businesses in Europe.

Impacts on Recycling

ERFMI and its members are working hard to increase the recycled content in their products, as is required for the development of the Circular Economy in Europe, but also to meet legislation towards minimum recycled content targets such as Construction Products Regulations and the ESPR. It would be virtually impossible for recyclers producing the recyclates and therefore manufacturers using the recyclates to demonstrate compliance to the 25 ppb limit for individual small PFAS or the 250 ppb sum total limit for small PFAS.

Summary

To ensure clear legal standards for recycled materials and products placed on the market, in particular those that do not intentionally add PFAS in their products, we propose the following approach.

A general exemption from the 25 ppb and 250 ppb limits for small PFAS in recycled materials, products containing recycled content and products that do not contain intentionally added PFAS.

This option maintains comprehensive regulation of the entire PFAS chemical spectrum through the 50 ppm Total Organic Fluorine (TOF) limit.

Jane Gardner, Managing Director
European Resilient Flooring Manufacturers' Institute, ERFMI,
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