

Request for derogation on the use of PTFE as anti-drip agent in thin wall flame retardant polycarbonate compounds

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Executive Summary

Flame retardant polycarbonate compounds used in thin-wall consumer electronics applications plays a critical role in consumer safety and requires the use of PTFE as an anti-drip additive. Thin walled parts reduce the amount of plastic used and therefore the amount of plastic waste produced during the manufacturing process as well as at the electronic devices' end of life. Before these tough thin-wall flame retardant polycarbonates were available, typical wall thicknesses in consumer electronics were 2-3 mm, which in comparison can lead to a 100% to 200% increase in resources consumption and solid waste generation, depending upon the electronic application design requirements. Thin-walled polycarbonate can also lead to lighter products which require less energy for transportation, resulting in less CO₂ emissions.

Our justification for requesting derogation of PTFE as anti-drip agent in flame retardant polycarbonate compounds comprises two elements:

- there are no alternatives to polycarbonate that provide adequate impact resistance and ductility for thin wall ($\leq 1.5\text{mm}$) applications in electronic products
- in order to ensure that the polycarbonate thin wall has adequate flame retardancy, it is essential to use PTFE as the anti-drip agent

There is no other engineering plastic available today which provides adequate levels of impact resistance and ductility compared to polycarbonate. These properties are crucial to:

- provide a durable product that does not break during normal use, including drops and other foreseeable events
- ensure safety by avoiding exposure of life circuitry, and
- meet EU regulatory requirements on the safety of electrical device

The next best material is polyphenylsulfone (PPSU) which has almost half the ductility. By extension, we can expect that electronic products with thin walls ($\leq 1.5\text{mm}$) made from PPSU would be twice as fragile compared to the same products made with polycarbonate. Increased fragility means increased risk that the device may break after an impact event, which may result in electrical hazard (short circuit, shock hazard) or fire hazard.

We have carried out a thorough analysis of the latest available flame-retardant and anti-dripping technology for polycarbonate, via a patent and literature review, as well as our own in-house technical expertise based on decades of experience with plastics. Our review of patents found that most flame-retardant polycarbonate materials are formulated with PTFE as an anti-dripping agent. We did find some patents which do not use PTFE; however, we did not find any non-PFAS alternatives which are acceptable from the standpoint of environment and human health, and which do not compromise the impact resistance and ductility of the polycarbonate. Our literature review found that all recently developed flame retardants mandate the use PTFE as an anti-drip agent in polycarbonate.

Our company has also carried out our own in-house experiments to investigate whether we could develop alternative additives that could be used instead of PTFE. None of the alternatives that we tested was able to provide adequate flame-retardant properties without significantly degrading impact resistance or other mechanical properties.

1. Introduction to thin wall flame retardant polycarbonate

Injection mouldable polycarbonate resins, polycarbonate blends and polycarbonate copolymer resins are used for thin wall flame resistant enclosures, structural components and/or insulators for the consumer electronics industry. Thin-walled parts produced from these types of polycarbonate resins reduce the amount of plastic used and therefore the amount of plastic waste produced during the manufacturing process as well as at the electronic devices' end of life. Before these tough thin wall flame retardant polycarbonates were available, typical wall thicknesses in consumer electronics were 2-3 mm, which in comparison can lead to a 100% to 200% increase in resource consumption and solid waste generation, depending upon the electronic application design requirements. Thin-walled polycarbonate can also lead to lighter products which require less energy for transportation, which results in less CO₂ emissions.

Flame retardant polycarbonate provides an extraordinary combination of mechanical, electrical, and flammability properties and has become increasingly used in almost every electronic device. Electronic devices often rely on unique combinations of properties that polycarbonates can have, including mechanical/impact strength, electrical insulation, flame resistance, corrosion resistance, integral (no-paint) color, and weather resistance. Depending upon the end use application, any combination of these properties could be the deciding factor for using polycarbonates versus other thermoplastic materials. For instance, consumer electronics often need lightweight, molded-in functionality with impact, electrical, and flame resistance that alternate thermoplastic materials cannot meet.

2. Analysis of alternatives for polycarbonate in electronic products

For thin (≤ 1.5 mm) injection moulded walls in electronic products, along with fire resistance, impact resistance and ductility are essential requirements. Impact resistance is measured using the Notched Izod impact strength test (ASTM **D256-10(2018)** standard method¹). Ductility is measured using elongation at break testing which measures how much a material can be stretched, as a percentage of its original dimensions, before it breaks².

As highlighted in the table below, polycarbonate offers unmatched impact resistance and ductility compared to other engineering plastics, which is crucial to:

- provide a durable product that does not break during normal use
- ensure safety by avoiding exposure of life circuitry, and
- meet EU regulatory requirements of the electrical device.

	Impact resistance	Ductility
	Notched Izod strength relative to polycarbonate	Elongation at break relative to polycarbonate
Polycarbonate	100%	100%
ABS	48%	23%
Nylon	7%	66%
Polyphenylsulfone (PPSU)	83%	55%
Polystyrene (PS)	17%	38%
Polyethylene terephthalate (PET)	4%	51%

¹ <https://www.astm.org/d0256-10r18.html>

² <https://www.curbellplastics.com/Research-Solutions/Plastic-Properties>

Poly (methyl methacrylate) (PMMA)	3%	3%
Polyether ether ketone (PEEK)	10%	44%

Additional considerations:

- Nylon: in addition to inferior impact resistance and ductility, nylon contains hydrophilic amide groups which makes nylon water-absorbent and causes it to expand. Water absorption results in dimensional changes to the plastic part which can cause the product to fail safety testing.
- PMMA: PMMA is infrared transparent and is often used in applications requiring infrared remote-control features. However, PMMA is more brittle than polycarbonate, which limits its application for electronic industry.
- PEI and PEEK: the impact performance is about 20 times lower than polycarbonate.
- Thermal stability is important for some applications where heat may be generated during operation of the electronic product. Polycarbonate has excellent thermal stability, while plastic like PBT have poor thermal stability, making them unsuitable for those applications.

In conclusion, there are no alternatives to polycarbonate that provide adequate impact resistance and ductility for thin wall ($\leq 1.5\text{mm}$) applications in electronic products.

3. Analysis of alternatives for PTFE as an anti-dripping agent in polycarbonate

It would be unacceptable and unsafe to use polycarbonate without an anti-dripping agent to prevent the spread of fire. Doing so could create fire hazards and would not allow products to comply to mandatory fire safety standards. PTFE is currently the anti-dripping agent in polycarbonate in electronic products. The high shear forces in the injection moulding process cause the PTFE to stretch and form fibrillated structures in the polycarbonate. Due to the high thermal stability of PTFE, the fibrillated structure remains intact during combustion process and forms a char which prevents dripping of burning plastic. PTFE also contributes to improved impact resistance and ductility.

We have carried out a thorough analysis of the latest available flame-retardant and anti-dripping technology, via a patent and literature review. Our review of patents found that most flame-retardant polycarbonate materials are formulated with PTFE as an anti-dripping agent. We did find some patents which do not use PTFE; however, we did not find any non-PFAS alternatives which are acceptable from the standpoint of environment and human health, and which do not degrade the impact resistance and ductility of the polycarbonate.

Additive/Technology	Observation	Conclusion
0.1%-0.5% potassium perfluorobutane sulfonate (KFPBS) ¹	KFPBS is a PFAS.	KFPBS is a PFAS and would therefore also be banned from use without a derogation
20% phosphorus-based flame retardant ²	Significant reduction of impact resistance, ductility and thermal properties.	As the polycarbonate will not meet the mechanical properties required by the EU safety standards, this material cannot be considered as an acceptable alternative
Aromatic brominated flame retardants ³	The Regulatory Strategy for Flame Retardants published March 2023 ³ proposes to ban the use of aromatic brominated flame retardants.	Due to enacted and proposed regulatory restrictions this material cannot be considered as an acceptable alternative

³ https://echa.europa.eu/documents/10162/2082415/flame_retardants_strategy_en.pdf/9dd56b7e-4b62-e31b-712f-16cc51d0e724?t=1678871526283

	The WEEE directive requires selective treatment for plastic containing brominated flame retardants. Ecodesign requirements for electronic displays forbid the use of halogenated (including brominated) flame retardants in the enclosure and stand of electronic displays.	
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Patent References: ¹ EP4021978A1, ² US20210171766A1, ³ CN112745641B

We have carried out an extensive literature review to investigate whether there are any new flame retardants recently developed that may not require the use of PTFE. Our review has found that all recently developed flame retardants mandate the use PTFE as an anti-drip agent.

FR Additive	Observation	Conclusion
Polyphenylsilsesquioxanes (cyc-PPSQ) ⁴	0.3% PTFE is added as an anti-dripping agent to meet flame retardant standards	This new flame retardant still requires the use of PTFE
Silicon-phosphorus linear polymer ⁵	0.45% PTFE is added as an anti-dripping agent to meet flame retardant standards	This new flame retardant still requires the use of PTFE
Expandable graphite ⁶	PTFE is added as an anti-dripping agent to meet flame retardant standards	This new flame retardant still requires the use of PTFE

Literature References: ¹ Journal of Materials Science 55 (2020): 10953-10967², Fire and Materials 43 (2019): 685-693, ³ Materials & Design 214 (2022): 110419

Our company has also carried out our own in-house experiments to investigate whether we could develop alternative additives that could be used instead of PTFE. Our research is summarised below. None of the alternatives that we tested was able to provide adequate flame-retardant properties without significantly degrading impact resistance or other mechanical properties.

The results of our in-house experiments on anti-drip agents are presented in the below tabular format. These chemicals were selected for experimentation as the most promising potential alternatives based on our own in-house expertise and literature and patent searching. As explained below, based on our experimental results, none represents an acceptable alternative to PTFE.

Tested technology	CAS#	Experimental result	Conclusion
Talc-based	Trade secret	Burning drips developed during flammability testing Significant reduction of mechanical properties	Does not provide adequate flame retardant properties
Sulfur-based	Trade secret	Burning drips developed during flammability testing	Does not provide adequate flame retardant properties
Silicone-based	Trade secret	Burning drips developed during flammability testing	Does not provide adequate flame retardant properties
Boron-based	Trade secret	Burning drips developed during flammability testing Significant polymer degradation.	Does not provide adequate flame retardant properties. Additionally, it is an SVHC which would be a regrettable substitution
Phosphorus-based	Trade secret	Significant reduction of impact resistance, ductility, and thermal properties.	As the polycarbonate will not meet the mechanical properties required by the EU safety

⁴ Journal of Materials Science 55 (2020): 10953-10967

⁵ Fire and Materials 43 (2019): 685-693

⁶ Materials & Design 214 (2022): 110419

			standards, this material cannot be considered as an acceptable alternative
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In the Regulatory Strategy for Flame Retardants⁷, ECHA also acknowledges that fluoropolymers, especially high molecular weight (HMW) PTFE, provide flame retardancy to polymers used in various industrial applications. PTFE, when incorporated into the polymer compound, reduces the dripping of the polymer upon burning and thereby retards the spread of flames. PTFE is added with loadings up to 0.5 wt%.

4. Proposed text for derogation for Thin Wall Flame Retardant Polycarbonate

There are no alternatives to PTFE available today for thin wall flame retardant polycarbonate. A wide range of potential alternatives have already been tested and found to fail to provide the necessary properties. A new round of extensive, fundamental laboratory research will be needed to attempt to identify a completely new material, unknown today, that may potentially be developed into an alternative to PTFE. We expect it may take up to 8 years to carry out this basic research.

If a new alternative material is identified it would take several more years to test, qualify, certify, and start manufacturing parts from this replacement material. Companies may need to make changes to their manufacturing equipment and processes to use the new material in their injection moulding lines. These changes to manufacturing equipment and processes may be significant and require extensive time and capital investment.

Product requalification is a very time-consuming exercise which will require extensive resources over many years. The completion of this task will require sufficient test house capacity and transition time to requalify all existing thin wall flame retardant polycarbonate parts in products which are used in Europe for safety and performance. For a company with a wide range of existing product designs, we estimate it could take up to 5 years to carry out the necessary manufacturing equipment changes and product re-qualifications.

In view of this, we recommend a minimum 13.5 year derogation for flame retardant polycarbonate compounds for the production of thin walled parts, as follows:

By way of derogation, paragraphs 1 and 2 shall not apply to:

[xx] flame retardant polycarbonate for the production of thin walled parts until 13.5 years after EiF

5. Critical Safety Need for Flame Retardants in Electronics

Statistics from several European countries reveal that electrical equipment account for 25 - 30% of all domestic fires, estimated in 273,000 fires per year. Fires can be generated by

⁷ Materials & Design 214 (2022): 110419

devices connected to the mains power, or battery powered devices. Lithium-ion batteries, in a fault condition, are also capable of overheating leading to ignition and subsequent explosion.⁸

Flame retardancy has been proven to work and continues to be a powerful tool in the overall efforts to prevent fire related injuries and save lives. One of the most important benefits of flame retardancy in product design is they can stop small ignition events from turning into larger fires. Even if ignited material with flame retardancy also delay the spread of fire to give people sufficient time to escape. For example in the EU, due to the introduction of increased fire safety standards — the number of fire victims fell by more than 48% in France from 1982 to 2012, and by 56% in the UK from 1982 to 2013. Overall Europe has achieved substantial improvements in fire safety, with fire fatalities dropping by 65% over the last 30 years⁹. Since 2017, nearly different 500 types of electronic products have been recalled, withdrawn, or banned from sale in the EU due to fire hazards¹⁰.

Other materials and components used in electronics are insufficient to prevent or delay the spread of fire from electronics. For example, protective components within electronics can reduce but not eliminate the risk of fire from electrical malfunction/failures. For example, a thermal fuse in a motor operated appliance will offer protection against an abnormal overload condition but it will not protect against other component failures like overheated power switches, connectors, wiring etc.

Another example is current-limiting components such as circuit breakers that are triggered by current rather than voltage. Once they are triggered, current limiting devices restrict power from reaching the equipment being protected without having to dissipate that power as heat. Therefore, there is virtually no limit to the amount of energy that they can handle. However, current-limiting devices do not generally respond fast enough to protect equipment from fast transient overvoltage's generated by lightning or electrostatic discharge which can lead to a flashover/arcing.

It is therefore essential to continue to guarantee the availability of PTFE and flame-retardant polycarbonate for the safety of electrical equipment on the European market until an effective and safe alternative can be found.

6. EU regulatory requirements for flame retardants

Polycarbonate with flame retardancy is used especially in electrical and electronic equipment including IT applications, household appliances such as a hair dryer, adapters, charger, notebook computer, smart meters, lighting applications, and charging stations for electric vehicles. Polycarbonate is selected due to its unique combination of properties including fire retardancy, heat resistance, dimensional stability and impact resistance, which are critical to the ensure the safety of the final application (e.g., prevent electrical shocks).

The European low voltage directive (2014/35/EU) sets safety requirements for electrical equipment within certain voltage limits. Those safety requirements are defined by the EN 60335-series standard, which includes stringent flammability requirements.

Standards EN 60695-11-10 (test flames methods, ignition source with a nominal thermal power of 50 W) defines the burning classification of plastics materials. The flame behaviour of plastic materials is described as their ability to burn / extinguish and spread fire. V-0 materials are the highest flame-retardant class (most flame-retardant), offering the highest protection against fire hazard. Materials classified as V-0 shall not burn (burning stops within 10 seconds

⁹ Modern building alliance Europe: Fire Death Rate Trends: An International perspective

¹⁰ Safety Gate: the EU rapid alert system for dangerous non-food products

on a vertical specimen) and shall not spread fire (drips of particles are allowed as long as they are not inflamed). Materials classified as V-1 (the second highest flame-retardant class) shall stop burning within 30 seconds on a vertical specimen, and drips of particles shall not be inflamed. Similarly, according to standard EN 60695-11-20 (test flames methods, ignition source with a nominal thermal power of 500 W), to be rated 5VA, a material must stop burning within 60 seconds on a vertical specimen, no drips are allowed, and the plaque specimens may not develop a hole. 5VB rated materials must stop burning within 60 seconds on a vertical specimen, no drips are allowed, and the plaque specimens may develop a hole.

In order to achieve compliance with those standards, flame retardant additives, to stop the burning, and anti-dripping additives, to prevent fire spreading, are included in the formulation of V-0, V-1, 5VA and 5VB rated materials. The role of PTFE in flame retardant polycarbonate is to prevent the formation of dripping particles, and therefore ultimately to prevent a fire from spreading.

7. Socio-economic impacts

The Electrical and Electronics (E&E) sector represents the second largest market for polycarbonate in the EU. In 2015, 23 % (147,200 t) of the total polycarbonate consumption in the EU (ca. 640,000 t*) was used to make products in the E&E-sector. Polycarbonate helps manufacturers meet the need for continuously higher standards of appearance, sustainability and safety, and satisfying emerging regulatory and eco-design standards. In 2010, the total European E&E sector supported 26 million jobs and generated value added of € 139 billion, of which polycarbonate applications made as substantial contribution. Together with applications in the domestic appliances/household sector which consumed 8% (51,200t), these two market sectors account for nearly one third of all polycarbonate consumption in the EU.

Besides being the material of choice to meet the regulatory requirements in E&E sector, polycarbonate is also used in automotive, aircraft, railway, construction, and many other applications, due to its unique combination of characteristics.

Please refer to the confidential Annex for additional information.

8. PFAS tonnages and releases from flame retardant polycarbonate

Please refer to the confidential Annex for information on our uses.

PTFE is 'encapsulated' into the polymer matrix, and it is not expected to migrate or leach out of polycarbonate during service life of the products.

Directive 2012/19/EU on Waste from Electrical and Electronic Equipment (WEEE) regulates the end of life of electrical and electronic equipment and sets targets for the separate collection and recovery and recycling of this equipment, and the proper treatment of residual un-recycled fractions. In view of this, it is not expected that PTFE used in polycarbonate will make significant contribution to the releases of PFAS in the environment.

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