

EPTA position regarding the proposal to restrict per- and fluoroalkyl substances (PFAS) under REACH and application for derogation

1. Introduction

EPTA, the European Power Tool Association represents 25 European manufacturers of electrical power tools with a strong production base in central Europe. Our members represent approximately 70.000 employees in Europe (170.000 worldwide) and around 90% of corded and cordless power tool sales in Europe (by value). EPTA members' portfolio encompasses both, corded and cordless power tools, the latter of which use lithium-ion rechargeable batteries. Cordless power tools are the fastest growing segment of the power tool market with a 50% share in 2022. The industry's annual turnover is around 8 billion €. Power tools are used both by skilled tradesmen, in a professional capacity, mainly in the construction industry, as well as by DIY users undertaking home improvement projects.

EPTA is monitoring closely the proposal by four Member States' and Norway's competent authorities to restrict around 12.800 per- and fluoroalkyl substances (PFAS) under Annex XV of REACH. While **EPTA fully supports the aims of ensuring safety for humans and the environment** that motivate the proposal, we would urge authorities to take a **proportionate approach**. It should be ensured that the **usage of fluoropolymers**, a sub-group of PFAS not classified as hazardous by the CLP Regulation and described by the OECD as polymers of low concern, **stays possible for applications, which are critical to the EU's twin green and digital transition when there is no foreseeable substitute substance**. These fluoropolymers are commonly used in many kinds of electric and electronical devices, such as power tools and their components, due to their unique combination of properties, which for example include a low coefficient of friction, temperature, and chemical resistance.

As a downstream sector industry, we are currently undergoing intensive efforts and are in contact with our supplying companies to find out where in EPTA members' products PFAS are generally used and for which applications, as well as if suitable alternatives might exist. According to first results of our inquiries, fluoropolymers are the main type of PFAS used in power tools and are used in the following components in our sector (list is non-exhaustive):

- Batteries, in separators, binders, gaskets, seals, electrolytes
- Electrical motors and combustion engines
- Lubricants, coatings and greases of surfaces, to e.g., reduce friction
- Plastic parts of EEE as fluoropolymers are the most flame-retardant plastics
- Seals and gaskets
- Cables and their sheathing
- Industrial installations and manufacturing equipment

However, gathering the detailed information necessary to show why derogations for these uses are needed will likely not be possible in the six months of the public consultation until September 2023. The reason for this is that no obligation to track PFAS or provide information on them exists so far, meaning that all companies, including our suppliers, have to start from the ground up. In the engineering sector, components are chosen for their specifications, while the way to achieve these specifications, including the materials used, is up to the respective suppliers. Therefore, information held by manufacturers on the substances used is limited.

The broad scope of the proposed definition of PFAS and the lack of a definitive list of PFAS substances will pose further problems when collecting information due to the administrative burden and resources needed to track information through our complex international supply chains.

Hereby, we are submitting our first contribution to the public consultation, to bring this problem that we share with many other user industries of PFAS as well as all information currently available to us to the attention of ECHA and the competent authorities of Member States. In the course of the ongoing public consultation, we are also aiming to provide further information that we gather during our current efforts in a second, updated contribution.

Overall, we perceive the impact of this potential restriction on our sector to be high, as fluoropolymers are used in the wide variety of applications in the power tools sector mentioned above, with most of them likely being hard or impossible to substitute at this point, due to the unique combination of properties of fluoropolymers. Even still, due to the high price of fluoropolymers, industry is already incentivised to replace them and is investing into research and development in this regard.

EPTA members appreciate the need for risk-based assessment processes in managing substances in their products and supply chains and, while supporting every effort to protect customers and the environment, urge ECHA and the European Commission to apply risk-based processes to assess the potential of restricting PFAS, assessing PFAS by PFAS sub-category or substance to enable appropriate action to be taken, taking into account that some categories of PFAS cannot be substituted.

This is for example the case for the uses of fluoropolymers in batteries, specifically also rechargeable lithium-ion batteries for power tools. For this reason, **EPTA calls upon the European Commission, ECHA, its committees and the competent authorities of Member States to grant a derogation for 13,5 years to the uses of PFAS in batteries as laid out in chapter 2.**

Furthermore, fluoropolymers also serve essential purposes in several components of combustion engines and cannot currently be substituted. Therefore, **EPTA calls upon the European Commission, ECHA, its committees and the competent authorities of Member States to grant a derogation for 13,5 years to these uses of fluoropolymers in combustion engines**, as we explain in chapter 3.

Lastly, it must be noted that components in which PFAS are used might be critical for the functionality of a product. Requalification and recertification of these components and products, which are already on the market today, is subsequently necessary and there may not be sufficient third-party certification companies available to provide these needed recertification services in a timely manner. Such complex recertification and requalification processes are very time-intensive, both due to this shortage of test houses and their technical complexity. This is also exacerbated by the fact that suppliers cannot test and ensure that any alternatives to PFAS they might find are suitable for all uses of their components. Furthermore, if alternatives are only found by singular companies, a sufficient availability on the market cannot be assumed.

For these reasons, **EPTA calls upon the European Commission, ECHA, its committees and the competent authorities of Member States to grant an additional transitory derogation period of 24 months**, because if PFAS free components such as battery cells should once become available on the market, power tool manufacturers need further time for testing and choosing cells and components and redesigning and recertifying their battery packs and power tools.

2. Lithium-ion batteries

2.1. Where in lithium-ion batteries are PFAS being used and why?

As an industry that buys cells and assembles them into high-power battery packs for power tools, knowledge about the usage of PFAS on cell level is available to us only in limited capacities. We contributed our knowledge and information to the submission by RECHARGE, the advanced rechargeable & lithium batteries association to this public consultation, which we, as an associate member of RECHARGE fully endorse. This dossier shows a full overview over the uses of PFAS in the battery industry, comprehensive information on the tonnages of PFAS used in batteries, the emission risk posed by PFAS in batteries, as well as the availability of alternatives for PFAS in batteries (reference number: **cb6a7d0a-caa1-42fa-a806-f7410538f8b9**). For your convenience, we summarised in the table below the data and technical details showing why derogations, **specifically also for PFAS uses in power tool batteries** as listed in chapter 2.2, are necessary from a technical point of view.

Table 1: PFAS uses in batteries and why they are irreplaceable

PFAS Type	Why is it used and where	Why can it not be replaced	Pages in RECHARGE's dossier for further reference
PVDF	In binders in the active material mass: - Enables a homogenous distribution of the slurry - Protects the composite electrode from corrosion and the electrolyte from depletion - Tailors the viscosity of the slurry	No already available alternatives, only preliminary research programmes. Other binder systems degrade and cause cell performance and manufacturability issues	Pages 9-11, 22-25
PTFE	In binders in the active material mass: - Mechanical cohesion to enable electrode integrity - Lubricant to allow the electrode particles to slide over each other during electrode formation - Hydrophobic properties – Lower water absorption during mixing	No available or researched alternatives. Only PTFE possesses the needed fibrillation, chemical, and hydrophobic properties. Other binder systems degrade and cause cell performance and manufacturability issues	Pages 11-12, 25-26
Various PFAS including LiTFSI, LiCF ₃ SO ₃ (triflate)	In electrolytes: Increase electrolyte stability by capturing water and avoiding hydrogen fluoride emissions	No alternatives available for high performance/next generation batteries. PFAS prevents 20% degradation of battery life.	Pages 13, 26-27
PFA, VDF, HFP, FKM	In gaskets: Very thin high-performance gaskets with chemical and thermal stability and high permeation resistance can be formed to provide stability to high power and high temperature cells	No alternatives available as no other polymers have the required mechanical properties and electrical insulation properties (withstand 280 amps)	Pages 15, 28-30
PTFE, PVDF	In coatings on separators: - Separate the negative and the positive electrodes whilst not participating in electrochemical reactions, preventing short-circuit - Ensure 35%-45% porosity with a pore size of 200nm to 1µm	Some alternatives are available and in development, but more time is required for substitution	Pages 16-17, 31-34
PTFE, FEP, PFA, VDF, HFP, FKM	In valves, gaskets, washers: Prevent leakage of the electrolyte from the inside and penetration of moisture from the outside	Some alternatives are available and in development, but more time is required for substitution	Pages 14-15, 31-34

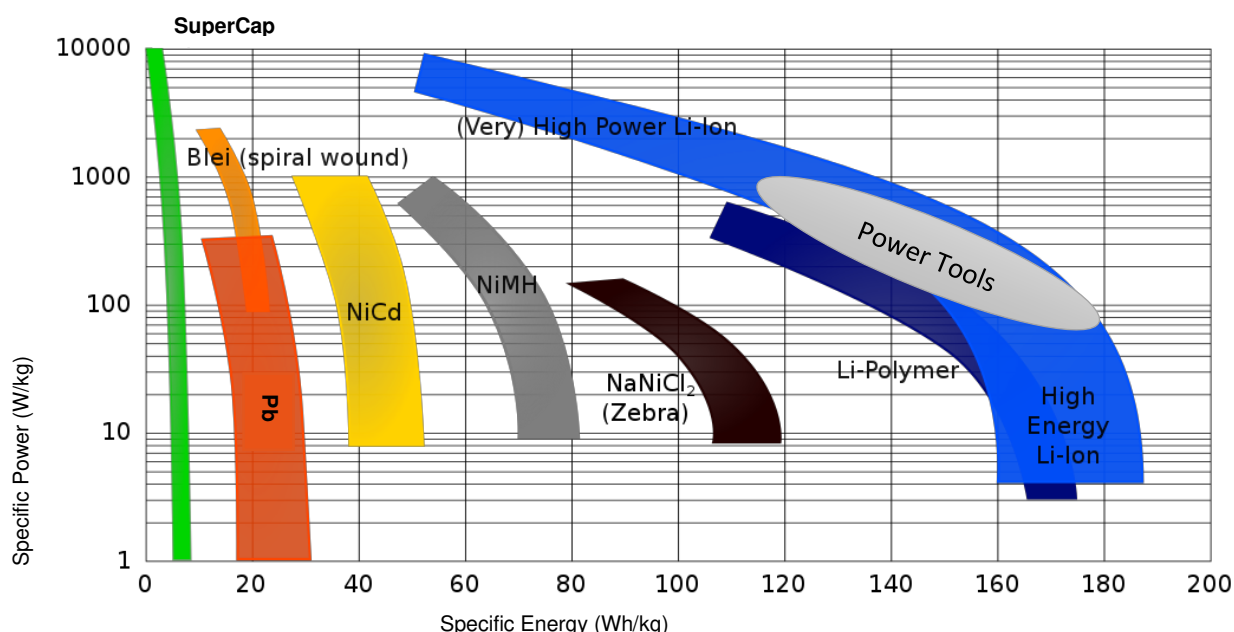
Source: Submission to the public consultation by RECHARGE, the advanced rechargeable & lithium batteries association (reference number: **cb6a7d0a-caa1-42fa-a806-f7410538f8b9**).

2.2. Why are lithium-ion batteries used and why are they irreplaceable in the power tools industry?

Rechargeable lithium-ion cells are used by power tool manufacturers to design battery packs. Lithium-ion cells are required for the use in battery powered products, as there is currently no alternative cell

technology that i) can meet or compete with the necessary requirements and key performance indicators and ii) is ready for industrial series production. The requirements for lithium-ion cells in power tools relate in particular to high performance and rate capability in both the charging and discharging directions, as well as thermal operating conditions (-20 to 60 °C). In addition, sufficient safety and mechanical robustness of the cells must be ensured as power tools are used in close proximity to the user's body. Energy to weight ratio is also key for hand-held power tools, as the tool must be able to be handled ergonomically and safely for extended periods of time (e.g., when working on rooftops).

Figure 1: Ragone-Plot showing the performance of different battery chemistries regarding specific power and specific energy



Adapted from source: [File:Ragone-Diagramm.svg - Wikimedia Commons](#)

Users of our power tools rely on being able to charge a battery within the time it takes for another battery to discharge, to ensure uninterrupted workflow. Electric power tools vary highly in their usage and might sometimes be used for longer consecutive periods, while at other times requiring short bursts of high power. The graph above illustrates why only Li-ion batteries can support these applications, as specific energy as measured on the x-axis can be used as a measure of runtime/time between recharges while specific power as measured on the y-axis is a measure of the power needed for a given application or use. Modern electric power tools function in a range between 120-180 Wh/kg of specific energy. Lithium-ion batteries outperform all other battery chemistries regarding these parameters. For these reasons, lithium-ion technology is the only suitable battery technology available on the market for power tools and rechargeable Li-ion batteries are the state of the art in the power tools sector.

As outlined in chapter 2.1, fluoropolymers are necessary for several uses in rechargeable lithium-ion batteries and cannot be substituted today, which is why we would ask ECHA, the European Commission and the competent authorities of Member States to consider granting derogations for the following PFAS uses in power tool batteries:¹

¹ The full list of derogations can also be found in the submission by RECHARGE, the advanced rechargeable & lithium batteries association to this public consultation, which we, as an associate member of RECHARGE, were involved in compiling and fully endorse and support in its entirety (reference number: **cb6a7d0a-caa1-42fa-a806-f7410538f8b9**).

Table 2: Excerpt of derogations for PFAS uses in batteries requested by RECHARGE, the advanced rechargeable & lithium batteries association (please refer to the referenced source for the full list!)

PFAS Type	Where used in the battery	Type of battery	Derogation / transition period
PVDF	In binder in active material mass	Li-ion wet process (except for the graphite anode)	13,5 years because no alternative is available
PTFE	In binder in active material mass	Li-ion dry process and semi-dry process	13,5 years because no alternative is available
Various PFAS including LiTFSI, LiCF ₃ SO ₃ (triflate)	In electrolytes	Li-ion rechargeable	13,5 years because no alternative is available
PFA, VDF, HFP, FKM	In gaskets	High energy density batteries which require very thin high-performance gaskets such as Lithium-ion rechargeable batteries	13,5 years because no alternative is available
PTFE, PVDF	In coatings on separators	Li-ion rechargeable	Transition time of 6,5 years because substitution takes more time
PTFE, FEP, PFA, VDF, HFP, FKM	In valves, gaskets, washers	Li-ion rechargeable	Transition time of 6,5 years because substitution takes more time

Source: Submission to the public consultation by RECHARGE, the advanced rechargeable & lithium batteries association (reference number: **cb6a7d0a-caa1-42fa-a806-f7410538f8b9**).

Furthermore, we at EPTA call upon the European Commission, ECHA, its committees and the competent authorities of Member States to grant an additional transitory derogation period of 24 months in addition to the derogation periods for PFAS uses in batteries suggested by RECHARGE, because if PFAS free cells should once become available on the market, power tool manufacturers need further time for testing and choosing cells and redesigning and recertifying their battery packs and power tools.

3. Combustion engines

While the majority of power tools are driven by an electrical motor, some specialised niche applications are only possible by using combustion engines, due to their high power and independence from the power grid. This is for example the case for chain saws for woodworking applications in forests, in many cases even in remote regions with extreme weather such as the forests of northern Europe. To preserve such ecologically important applications of power tools, a derogation for the usage of fluoropolymers in combustion engines is needed. In combustion engines, fluoropolymers, especially FKM, are used in multiple components, due to the specialised needs that occur due to the chemical aggressiveness of fuels and engine oils, the high temperatures and pressure, as well as the needed flexibility and reliability of components. For the reasons we outline below, FKM cannot be substituted in these applications, and we call upon the European Commission, ECHA, its committees and the competent authorities of Member States to consider a derogation for these applications of fluoropolymers, specifically FKM, of 13,5 years. This time is needed to be able to identify parts and subcomponents, validate the components with a new material, should it once become available on the market, validate the product with the new components, implement assembly pre-development, and in the worst-case re-design and develop a

product, start-up production, implement it in the machinery fleet, turn the existing inventory and lastly recertify the product. For more information regarding the uses of fluoropolymers in combustion engines of power tools, EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, submitted a contribution to this public consultation (reference number: 2399d717-1ae2-49ba-97eb-4b538ef3e17e).

3.1. Manifolds

The manifold of cutting tools serves to convey fuel to the carburettor. Manifolds must remain sufficiently flexible over the lifetime of the machine. The engine as well as the connection point to the manifold reach cylinder temperatures of 200°C and higher during operation. The flexibility of the manifold must not change both at very low temperatures (-30°C) and in this hot environment, to ensure that the component does not fail and subsequently cause the failure of the machine, which can have serious effects on the health of users both directly in regular applications but also due to failure in safety-relevant operations such as firefighting. On the other hand, the manifold must be sufficiently rigid to ensure that it does not collapse in vacuum situations (-350 mbar at 60°C) after contact with fuels with different ethanol proportions or after prolonged storage periods, causing the manifold to dry out. In some machines, the manifold also takes over a function as a vibration-decoupling element to meet the specification of decoupling properties.

For these reasons, the manifold must consist of an elastic, chemical and temperature resistant elastomer. Hard plastics would lead to an increase of vibration especially at the grips and would impair functionality and safety. Plasticisers cannot be used in this regard, as they will be extracted over the lifetime of the product by the fuel, leading to shrinkage, hardening and settling effects and eventual leakage. Therefore, other available elastomers such as NBR, HNBR or XNBR are not suitable alternatives, as they rely on plasticisers. Their heat resistance at 150°C (HNBR) and 120°C (NBR) is also too low to be able to withstand continued engine use. Fluoropolymers such as FKM are fit for this application as they preserve tightness of the fit at the connection point due to low setting behaviour at these high temperatures. FKM is also highly resistant against the used fuels and oils, with a maximum swelling rate of 25%, which ensures that the component maintains its form and function. Silicone elastomers (VMQ), which are commonly used in high-temperature applications, show swelling rates of >100% when in contact with fuel, leading to collapse of the component in the event of a vacuum.

3.2. Fuel Hoses

Fuel hoses serve to convey different varieties of fuel (variable proportions of ethanol and aromatic compounds) and to reliably seal the fuel tank bushings and nozzles. To fulfil this function, the used material is required to not shrink when in contact with fuel. The material properties cannot change over the service life and at different temperatures, otherwise the component can fail and endanger the safety of the user. Due to their very high engine speed and the tight installation space, tools such as chainsaws have a high-frequency load on the dynamically loaded components (e.g., the hoses, the manifold). This can lead to microcracks, which can be prevented by using FKM. In addition to the function of the hose, a low permeation rate must be ensured, not least to comply with legislative requirements. In general, FKM and fluoropolymers fulfil similar functions in hoses as they do in manifolds. They are resistant against fuels with a swelling rate of max. 25%, which prevents the loss of tensile strength and cracks due to mechanical stress. They also function without plasticisers, which would slowly be washed out by the fuel over the service life and lead to leakage. FKM elastomers also make it possible to ensure that a permeation rate of 15g/m²d (in CE10 fuels) can be achieved for the hose to comply with legislative requirements stemming from EPA III EPA 40CFR 1060.515 and SAE J2996 (2013-01). The above-mentioned elastomers such as NBR, HNBR or XNBR contain plasticisers, which leads to hardening of the component over time and shrinkage, leading to leakage. In addition, the unsaturated polymer chains of these substances are damaged by ozone and develop cracks as they age. Due to the very high dynamic load in these applications, hoses made of these polymers can crack. Other elastomer types (such as silicone elastomers) are not a feasible option due to the lack of fuel resistance with swelling rates of above 100%, leading to the destruction of the component.

3.3. Inlet needles for carburettors

The inlet needles for carburettors serve to safely regulate fuels of different qualities with variable proportions of ethanol and aromatic compounds. The tip of these needles consists of FKM to ensure that it maintains its form during its entire service life in contact with the fuel and can ensure constant and fine metering tolerances of the fuel in the carburettor. In case of failure of the inlet needle, the engine could stop working altogether, which could be fatal in safety-relevant applications such as by firefighters. Other possible outcomes of a failure of the inlet needle are the seizure of a piston and subsequent total loss of the machine, or a permanent increase of CO emissions, leading to breaching legislative limit values, depending on if the fuel in the engine is too lean or too rich due to the failure. Again, the low swelling rate of FKM of 25%, as well as its flexibility without the use of plasticisers are key parameters that enable the inlet needles to consistently perform their function without leakage and implications for the safety of the user. Alternative elastomers such as NBR, HNBR or XNBR lack these properties.

Furthermore, the sealing seat for control needles is coated with PTFE, especially for dusty applications, to ensure that it can be reliably opened. PTFE serves to reduce the adhesive forces in this case.

3.4. Gaskets

In the fuel system, gaskets (e.g., O-rings and flat gaskets for fuel tank caps) made of FKM are used to prevent unwanted fuel leakage over the product's entire service life and to ensure operational and functional safety. They must remain tight against fuels of varying qualities (different proportions of ethanol and aromatic compounds). As outlined above, FKM is characterized by excellent fuel resistance and low permeability. Due to its low swelling rate and high flexibility, cracks can be avoided. FKM is also not dependent on plasticisers. Furthermore, FKM has a low compression set of under 40% at high temperatures of 175°C and is resistant to aging effects by ozone exposure even after long times of storage (40% elongation in conditions of 40°C after 500 hours). FKM elastomers also make it possible to ensure that a permeation rate of 1,5g/m²d (in CE10 fuels) can be achieved for the fuel tank to comply with the legislative requirements stemming from EPA III EPA 40CFR 1060.515 and SAE J2996 (2013-01). For the reasons outlined above, alternatives such as silicone elastomers or NBR do not fulfil these necessary requirements.

4. Where else are PFAS used in the power tools industry?

Besides their crucial applications in batteries and combustion engines, PFAS are, as outlined in the introduction, used in a variety of other components and products in the power tools sector. The types of PFAS used in all of these applications mainly are fluoropolymers, which are not classified as hazardous by the CLP Regulation and described by the OEC as polymers of low concern, such as PVDF, PTFE or FKM. Such fluoropolymers are for example used in several kinds of high-performance plastics, which are used in gaskets, fans, or the housing of power tools and their motors. Fluoropolymers are also used in gaskets in general, which serve to provide water ingress protection to ensure the safety of tools in the rough environments they are used in. Furthermore, fluoropolymers serve a wide variety of applications in lubricants and coatings for surfaces, to reduce friction and prevent mechanical blockages or overheating or to make surfaces resilient to external effects such as impact. Fluoropolymers can also serve to ensure that plastics around high-temperature parts such as the battery or the electrical engine are heat-resistant and flame-retardant. In a similar vein, cables and their sheathing in general can contain fluoropolymers. In all of these applications, fluoropolymers serve to ensure the safety of the user and mitigate several possible hazards. This can only be done due to the unique combination of properties they possess.

However, for all of these applications, EPTA members only have very limited information on the presence, concentration, weight, effect, substitutability and kinds of PFAS present in these components, as they are a downstream industry. In engineering industries, components are usually chosen for their technical specifications as well as legislative requirements to ensure the compliance of the components and finished products, while the way to achieve this is up to the respective suppliers. Recipes, substances used and manufacturing processes for the best components are intrinsically well guarded trade secrets of the respective supplying companies and provide a distinct advantage over the competition. In other cases, even supplying manufacturers themselves are again dependent on their respective suppliers, and do not have the possibility to easily gather information on the substances

present in their product either. Even within companies, such information might not be easily available due to a division of competences and organisational hierarchies and complexities. Lastly, as there have been no information obligations on most PFAS which are targeted in the broad group-based approach so far (except for two small sub-groups of PFAS which are regulated in the REACH and POP Regulations respectively), the information that is available at this point is very limited.

This is even further exacerbated by the fact that no reliable methods of measurement exist, which can capture the concentration of PFAS on the necessary level of detail needed to comply with the low concentration limits proposed by the dossier submitters. As a result, suppliers of components containing PFAS must first find ways of quantifying this information. Such methods of quantifying and testing should be established by public authorities to be able to verify compliance with the proposed PFAS limit values.

Despite intensive efforts, accruing information on chemicals in complex international supply chains proves to be difficult under these conditions. In this regard, we want to bring to the attention of the authorities, that we and many other downstream industries are in a difficult position regarding the proposal to restrict PFAS under REACH. We are aware that PFAS are used in many applications in our industry and suspect that in many cases they will be impossible to substitute in the mid-term future due to their unique combination of properties. However, due to our unique position in the supply chain, we are unable to provide the detailed information on the use of these substances needed in this public consultation to authorities.

Due to this, we call upon public authorities and the committees of ECHA to reconsider the other available instruments to ensure human health and the protection of the environment other than a restriction under REACH, such as adding relevant, hazardous PFAS to the candidates list of Substances of Very High Concern.

Lastly, it must be noted that components in which PFAS are used might be critical for the functionality of a product. Requalification and recertification of these components and products, which are already on the market today is time consuming and there may not be sufficient third-party certification companies available to provide these needed recertification services. Such recertification and requalification processes are also very time-intensive, both due to this shortage of test houses and their technical complexity. This is also exacerbated by the fact that suppliers cannot test and ensure that any alternatives to PFAS they might find are suitable for all uses of their components. Furthermore, if alternatives are only found by singular companies, a sufficient availability on the market cannot be assumed. Safety and innovation are core priorities of EPTA members. As a result, already now PFAS-free components would be used, if they were available in the supply chains, also due to the high costs of fluoropolymers.

For these reasons, we at EPTA **call upon the European Commission, ECHA, its committees and the competent authorities of Member States to grant an additional transitory derogation period of 24 months for recertification**, because if PFAS free battery cells or components should once become available on the market, power tool manufacturers need further time for testing and choosing cells and components and redesigning and recertifying their battery packs and power tools.

5. Is the use of PFAS in power tools essential?

With the European Green Deal, the European Union brought a variety of ambitious policy instruments on their way to ensure that the EU is on track to achieve the twin transition, to a more environmentally friendly and digital society, while preserving our single market and European values. In this context, power tools play a vital role. Power tools are used to install and maintain wind turbines, solar panels and energy storage facilities and in that way are essential to contribute to a cleaner energy mix. In construction projects, be it large-scale undertakings such as an underground bicycle parking space or smaller projects such as renovating and re-insulating existing houses, power tools are an essential mean to improve infrastructure or create sustainable housing. Without fluoropolymers, these applications of power tools will become less safe, efficient and at times even impossible, subsequently endangering the European Union's goals regarding environmental and climate protection. Often overlooked, the infrastructure and technologies used to catapult Europe into a more sustainable and digital future ultimately rely on the right tools, power tools, to be installed, maintained, and repaired.

6. What could be the socio-economic impacts of a ban on the use of PFAS for the power tools industry and more generally the batteries value chain?

EPTA represents 25 manufacturers of electrical power tools in the EU, equalling a total of 70.000 employees in Europe and 170.000 worldwide. The industry's annual turnover is around 8 billion €, with cordless power tools being the fastest growing segment of the power tool market with a current share of 50%. Research and development are of vital interest to power tool manufacturers, as safety and comfortability of our users are the fundamental concerns that need to be taken account of in the design of power tools. Especially battery technology and development are an important area of innovation and competition. In the case of a complete ban of PFASs without a derogation for batteries, such advances in battery technology would be stifled.

In general, as outlined above, information that would be needed to estimate the economic impact of a ban of the usage of PFAS in the power tools sector, such as the exact applications and detailed information on the substitutability and the timeline is missing. Due to this, realistic projections remain impossible at this point. However, if PFAS-free alternatives for components, which are essential for manufacturing power tools, were unavailable even for a limited period after the entry into force of a general restriction of PFAS, power tools could not be sold and marketed anymore. This could subsequently endanger the industry as a whole and the 170.000 employees it represents.

Lastly, the implications outlined above would also likely mean a loss of jobs in adjacent sectors, such as the construction sector, craftsmanship and the suppliers of power tool components. However, we cannot reliably estimate such developments.

Should you require more information, data or explanations please do not hesitate to reach out to us. We would be delighted to clarify any aspect of this paper, as the stakes are high for the power tools sector in this initiative for the universal restriction of PFAS.

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