

Necessary Exemption from the PFHxA Restriction

1. Under ECHA's PFHxA restriction dossier, the concern for PFHxA is based on its persistence and mobility. However, persistence and mobility alone do not demonstrate a risk per se and do not justify a restriction.
2. The ongoing restriction of perfluorohexanoic acid (PFHxA), its salts and the group of PFHxA-related substances, should include an exemption for the use of 6:2 FTS as a processing aid in the production of fluoroelastomers and fluoropolymers.
3. 6:2 FTS (6:2 fluorotelomer sulfonate or 3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctanesulphonic acid) is a short chain fluorotelomer substance.
4. 6:2 FTS is used for the production of fluoropolymers and is not intended to be present in end products, as may be the case for other PFHxA applications. Therefore, contribution to exposure via emissions is minor.
5. Fluoropolymers and fluoroelastomers are used in critical everyday industrial applications. Fluoropolymers and fluoroelastomers is where lithium-ion batteries, semiconductors, wiring, medical devices, automobile and aerospace equipment, acquire part of their special characteristics from.
6. Fluoropolymers and fluoroelastomers also contribute to the realization of key EU objectives, such as those under the EU Green Deal and digital transformation.
7. If the PFHxA restriction does not exempt substances like 6:2 FTS for the manufacturing of fluoropolymers and fluoroelastomers, these critical products and industrial processes will not be available in their necessary performance, as there are no equally efficient alternatives.
8. Most importantly, Chemours is using Best Available Techniques, minimizing water emissions close to zero, alleviating exposure concerns.
9. The direct market for fluoropolymers and fluoroelastomers is estimated to be worth €606M, whereas its valuation in downstream supply chains and industries increases to billions of euros.