

Schönaich, September 2023

Consultation on PFAS Restriction Proposal

FAULHABER is an independent family-owned group of companies with its headquarter in Schönaich near Stuttgart in Germany. We manufacture electrical miniature and micro drive systems used in production automation and robotics, aerospace, optical systems as well as medicine and laboratory technology.

We see a high impact on our industry through the PFAS restriction proposal. As a member of industrial associations (e.g. ZVEI e.V.), we closely observe the discussion about the restriction proposal and want to use the opportunity to contribute to the public consultation.

Corresponding to their wide use in electronic industries, PFAS are included in many FAULHABER components, such as insulation of wires and cables, printed circuit boards, capacitors or lubricants. The technical reasons for this wide spread use are described in many publications. We see the need to communicate that 80 to 90 % of our products will be affected by the discussed PFAS restriction.

Our supply chains are a global and complex network. As a single company and taking the fact, that the group of PFAS is very large, it is impossible to foresee all the details of this broad restriction scheme. Nevertheless, we know that the supply chain will be strongly influenced, even partly disrupted in case the PFAS restriction will come into force as currently under discussion.

In consequence, our business operations will be at risk.

We strongly ask to reconsider the PFAS restriction proposal. It is necessary to follow a risk and substance based approach, making sure that PFAS will be available for the European industry in the future, depending on use cases and environmental impact.

Best regards

Dr. Fritz Faulhaber GmbH & Co. KG


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