

**Response to the European Commission
concerning a transitional period of 6 years for textiles for the protection of worker (SEAC Nr. 3a)
Follow-up to the PFOA stakeholders meeting on March, 15th 2016**

This response is given by W.L. Gore & Associates (Gore), a company active in the field of protective garment solutions and most known for its Trademark GORE-TEX.

Main conclusions

Gore have moved away from C8 chemistry in many of our products since 2011. Gore have completed this move for its entire portfolio of fabrics products in 2013 and have not seen an upturn in complaints regarding Durable Water Repellency (DWR) performance. This is a great achievement as products which carry the Gore brand are known for high performance in extreme weather conditions, e.g. for protecting workers; military; mountaineers and mountain rescue teams; fire brigades.

Fire Fighting gear made with Gore fabrics maintains compliance with **EN 13034** and **EN 469** while having switched to short chain fluorinated DWR. This is due to Gore's DWR offering as well as design solutions. At the same time no negative impact on flame retardancy was observed.

For military apparel, e.g. standard rain suit products, sleeping bag covers, bivy and immersion suits Gore fabrics meet the full specifications including DWR.

For CBRN (chemical, biological, radiological and nuclear) protective apparel and for medical fabrics end uses we cannot comment as we haven't measured our short chain fluorinated DWR against these requirements.

Overall it has been possible for Gore to substitute C8 chemistry whilst maintaining high performance of its products.

Durable Water Repellency requirements & standards

EN 13034 is a standard for "Protective Clothing Against Liquid Chemicals - Performance Requirements for Chemical Protective Clothing Offering Limited Protective Performance Against Liquid Chemicals (Type 6 and Type PB (6) Equipment)". This standard establishes a specialist test indicating a certain protection from chemical spills. Where the standard is applicable, Gore fabrics - using short chain fluorinated DWR - comply with this standard after 5 household washes. However this test is not automatically relevant for the majority of professional use apparels such as police weather protective clothing.

(Certificates from the Notified Body Aitex can be provided upon request)

The chemical run off test contained in **EN 13034** is used broadly in other norms, for example the **EN 469** structural fire fighter norm. This test requires a repellency level of >90% for most of the chemicals after washing the piece of apparel.

All DWRs known today – long chain fluorinated and short chain fluorinated as well as non-fluorinated – are subject to temporary failure after a certain time in use. However, the DWR can be re-activated by washing and applying heat. The garment maker specifies the number of cleaning cycles the apparel can withstands without its repellency failing the test. The garment maker also provides instruction concerning the need of a DWR re-treatment (in case the factory applied DWR fails permanently).

It should be noted that it is a frequent practice to re-treat fire-fighting garments after every wash, even where it might not be indicated to do so by a decreasing repellency performance.