PERFORMANCE FLUOROPOLYMER PARTNERSHIP

September 24, 2023

Re: Comments for the REACH Annex XV All PFAS Restriction Proposal

Submitted via the European Chemicals Agency's webform at https://comments.echa.europa.eu/comments_cms/AnnexXVRestrictionDossier.aspx?RObjectId=0b0236e1885e69de

This information is submitted on behalf of the American Chemistry Council's (ACC) Performance Fluoropolymer Partnership (hereafter "PFP"), whose members include some of the world's leading manufacturers, processors, and users of fluoropolymers, including fluoroplastics, fluoroelastomers and perfluoropolyether polymers.[1] The PFP's mission is to promote the responsible production, use, and management of fluoropolymers. We invest in research to support our mission and inform a scientifically sound, risk-based approach to regulation.

This submission describes a project to analyze a set of perfluoropolyethers (PFPEs) against criteria used widely to identify polymers of low concern to human health or the environment. PFPEs are large polymeric compounds that are highly insoluble in either water or octanol and are therefore not mobile, bioaccumulative, or bioavailable. They do not contain meaningful amounts of residual monomers or low molecular weight oligomers due to efficient manufacturing processes. PFPEs are also highly resistant to thermal, chemical, and physical challenges. The PFPEs analyzed in the project are described in Table 1.

The study manuscript, including study methodology and results, will be published in a scientific journal and is currently undergoing peer review. The anticipated citation will be Javed, H. *et al. A Critical Review of the Application of Polymer of Low Concern and Regulatory Criteria to Perfluoropolyethers.* Integrated Environmental Assessment and Management. Vol., No., pp. TBD. Based on the evidence presented in the forthcoming manuscript, we respectfully request a full exemption for the use of these PFPEs.

Thank you for the opportunity to provide these comments. Please contact me if you or your colleagues have any questions.

Sincerely,

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[1] https://fluoropolymerpartnership.com/

Table 1. PFPEs analyzed against polymers of low concern criteria.

Common Name	Chemical Name	CAS#	Structure	Linear/ Branched
PFPE D	Oxetane, 2,2,3,3-tetrafluoro-, homopolymer, fluorinated	113114-19-5	$F\text{-}(CF_2CF_2CF_2O)_n\text{-}CF_2CF_3$ n = 10 to 100	Linear
PFPE Z	Ethene, tetrafluoro-, oxidized, polymd	69991-61-3	$CF_3O\text{-}[CF_2CF_2O]_p\text{-}[CF_2O]_qCF_3$ p/q = 1	Linear
PFPE K	Poly[oxy[trifluoro(trifluoromethyl)-1,2-ethanediyl]], α-(1,1,2,2,2-pentafluoroethyl)-ω-[tetrafluoro(trifluoromethyl)ethoxy]-	60164-51-4	$CF_3CF_2CF_2O\text{-}[CF(CF_3)CF_2O]_n\text{-}CF_2CF_3$ n = 6 to 100	Branched
PFPE Y	1-Propene, 1,1,2,3,3,3-hexafluoro-, oxidized, polymd.	69991-67-9	$CF_3\text{-}[(OCF(CF_3)CF_2)_m\text{-}(OCF_2)_n]OCF_3$ m+n = 8 to 45	Branched