



The universal PFAS restriction

A civil society perspective

Belgian REACH Committee Open session
6 September 2023
- Bond Beter Leefmilieu

Who we are and who we represent

Actions concerning PFAS

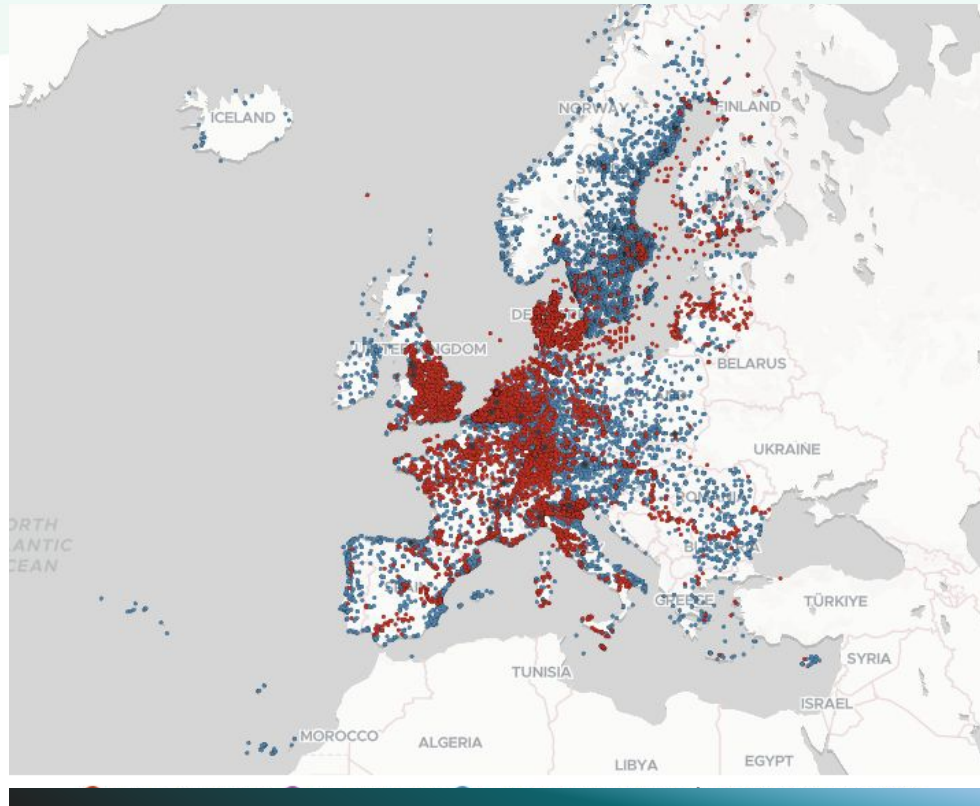
- Broader EU civil society PFAS movement
- Campaign Toxic-free future (EEB)
- Stakeholder in Remediation Alliance Zwijndrecht
- Advocacy for Flemish PFAS action plan and action plan Substances of Very High Concern



Introduction

‘Forever pollution’ mapping project (*Le Monde*):

- Over 17 000 contaminated sites across Europe
- More than 2 100 ‘hot spots’ (PFAS concentration detected in levels that are hazardous)
- Belgium is one of them



1. PFAS pose a grave danger to the environment and people

- PFAS are highly persistent for the environment
 - Scientific consensus
 - Confirmed by previous opinions of RAC (Microplastics, PFHxA, PFAS in FFFs etc.).
 - Increasing health concerns (thyroid disease, cancer, infertility etc.)
 - Uncontrolled emissions, transboundary pollution -> cannot be tackled by individual States
 - PFAS pollution already affecting communities in Europe and beyond
 - Cost of env. remediation estimated between 821 million to 170 billion euros
 - Costs regarding human health in the EEA between 52 and 84 billion euros a year
- PFAS give rise to “unacceptable risk” (Art 68.1 REACH)

2. The legal framework is not sufficiently robust

- No comprehensive harmonized EU legislation at the moment (POP Regulation, REACH SVHC Candidate List, CLP classification, limits values in water directives etc.)
- Only a few, most 'well-known' PFAS regulated (PFOA, PFOS and long-chain substances (C9-C14))
- The Chemicals Strategy for Sustainability promised a 'group' approach to chemical restrictions

3. PFAS-free solutions exist

- PFAS used widely across products, incl. for consumers
 - Sometimes unnecessarily (e.g. in textile: you can produce a raincoat without PFAS!),
 - Or when safe alternatives already exist (e.g., in cookware, packaging).
- Regulation is proven incentive for innovation.
- EU Commission financial support for development innovative methodologies for PFAS remediation and substitution in products.

4. There is consensus on the need to adopt a ban

- Study for a non-toxic environment (7th EAP, 2013)
- Scientists' Madrid Statement (2015)
- Council conclusions of 2019
- EP questions (2021) and Motion for Resolution on the CSS (2020)
- Calls from the UN Special Rapporteur on toxics and human rights based on right to healthy and sustainable environment (UNGA, 2022)
- 'BAN PFAS' Manifesto (2022) Supported by +130 EU civil societies
- Industries joining the ChemSec PFAS movement

Manifesto for an urgent ban of
'forever chemicals' PFAS



Can you spot the
PFAS pollution?
...it's not hard is it?

#BanPFAS

Signatories

110 organisations have signed the manifesto – if your organisation would like to sign on to the manifesto, please send an email to sign@banpfas.eu



4. There is consensus on the need to adopt a ban



Δρυάς



GREENPEACE



Kom op
tegen Kanker



De Neutrale Ziekenfondsen
UW VRIJHEID, UW ZEKERHEID

onafhankelijke
ziekenfondsen



Thomas Goorden



What a PFAS restriction should look like

- **ALL PFAS as a group must be phased out**
 - Persistency concern confirmed for most PFAS compounds, yet too often toxicological data is unavailable: grouping is most effective
 - Substance by substance approach has proved inadequate + leads to regrettable substitution
 - PFAS pose issue throughout their lifecycle – not just during the use phase
- Unless they are critical for a specific use and without alternative
- Derogations must be exceptional and time limited
 - No unjustified derogations, e.g. for food contact and drinking water uses
 - Exemptions for PFAS used as active substances in pesticides, biocides and medicines are not justified because not adequately covered under their own piece of legislation

1. Implement an ambitious PFAS restriction
2. Tighten the REACH regulation and close loopholes
3. Adjust PFAS Standards regularly on the basis of the most recent scientific insights
4. Increase capacity for monitoring and enforcement

Contact



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