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Committee of the restriction
proposal for per- and
polyfluoroalkyl substances
(PFAS)

Statement on the Proposal for Restrictions on Per- and Polyfluoroalkyl Substances (PFAS)

Dear Sir or Madam

The proposed scope of restrictions for per- and polyfluorinated alkyl substances (PFAS) in the February 2023 EU report is of concern. The current definition of the PFAS family is too broad and there is a risk that a generalized classification will prevent a differentiated risk assessment of individual substance classes. In particular, this applies to fluoropolymers such as polytetrafluoroethylene (PTFE), fluororubber (FKM), perfluorubber (FFKM) or perfluoroethylenepropylene (FEP). The principle of proportionality, which is at the core of European legislation, is violated by the inclusion of fluoropolymers in the restriction proposal. Fluoropolymers are indispensable in a wide range of applications due to their exceptional properties, such as chemical resistance, thermal stability and low coefficient of friction. These applications include not only everyday commodities, but especially high-tech applications.

Restricting the use of fluoropolymers across the board would endanger the societal and economic benefits of these materials, rather than mitigate the risk. Such a restriction could have a negative impact on EU society, as fluoropolymers contribute to sustainability, safety and economic efficiency in many industries. They play a key role in improving safety for human health and the environment, especially through their application in areas such as energy efficiency, clean technologies and medical technology.

The company TEDAG Dichtungstechnik und Industriebedarf AG represents an example of the importance of fluoropolymers. It manufactures components from fluoropolymers such as PTFE, FKM, FFKM or FEP, which are used in a wide range of industries. Due to their special properties, such as low coefficient of friction, chemical and thermal resistance, fluoropolymers are

indispensable in applications such as seals and guiding elements. The materials have been tested over decades and have been able to solve problems in a wide variety of applications. For example, the components made of fluoropolymers are used in laboratory equipment for drug development in the pharmaceutical industry or are essential in hydraulic applications for die casting of car chassis for electric cars.

The materials used, such as FFKM, are up to a thousand times more expensive than other elastomers and are therefore only used in applications where no other material can be considered. This makes this and other fluorinated materials impossible to replace.

Implementing restrictions based on isolated exemptions would require an enormous administrative burden, given the complexity of supply chains and the diverse end uses of fluoropolymers. A full exemption of fluoropolymers from restriction would ensure continuity of critical applications while continuing to provide their benefits. It is important to keep in mind that the benefits of fluoropolymers generally outweigh the potential risks, especially considering the specific contexts of their use and current knowledge of their environmental impacts.

Fluoropolymers represent a special group within the broad PFAS family that should be distinguished from other members of this class because of their unique properties. Therefore, a broad exemption for fluoropolymers should be considered as part of the proposal to restrict PFASs. It is critical that regulatory action be based on scientific evidence and an accurate risk assessment that considers all aspects of the production, use and disposal of these substances. This is the only way to ensure that the benefits of fluoropolymers, unmatched by other materials, are maintained and potential risks are effectively managed. It is equally important to encourage parallel actions, such as improving industrial process control, waste and recycling measures and research and development of alternative materials where feasible and appropriate. Such an approach can support both environmental protection and industrial innovation in the EU, while preserving the benefits of fluoropolymers for our society.

With kind regards

TEDAG Dichtungstechnik
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Silver Schlittler
CEO