



BCGA Response to the proposed EU Annex XV Restriction Report for PFAS

The British Compressed Gases Association (BCGA) is the leading UK trade association representing the interests of 100+ member companies.

These companies, in the industrial, food and medical gases industries, include manufacturers and suppliers of bulk liquid and cylinder gases, cylinders, vessels, tanks, pipework, systems, related equipment and providers of specialist safety, health, quality, inspection and training services. Today, BCGA members employ a combined 19,000 people directly and account for an annual turnover of £2.7 bn.

Whilst the UK is no longer a member of the EU the strong trade links remain with our members supplying products to and sourcing components and products from EU companies.

Whilst we agree for the need to update chemical regulation where new evidence exists in order to protect human health and the environment we do not believe that the PFAS restriction is proportionate. The PFAS restriction as currently proposed will significantly impact the compressed gases industry and compromise the strict safety standards that the industry currently adheres to.

Fluoropolymers have certain properties which are critical for the safe supply of gases, including excellent corrosion, temperature and chemical resistance. These properties ensure that compressed gases can be supplied safely, any alternatives will need to go through rigorous testing and approval processes to ensure that this level of safety remains. Whilst the industry is reviewing alternatives, any potential solution will not be found in the timeframe of 18 months, as set out by the restriction, if at all.

In terms of the impact of human health, compressed gas cylinders are assembled and filled under strict conditions in line with applicable workplace health and safety regulation. Exposure to the environment is controlled by the appropriate waste regulations.

Examples of the need for PFAS in the gases industry include:

- PTFE used for protection of the connection between the cylinder valve and the cylinder. PTFE is used in such a way to provide lubrication to the thread and allows for safe removal of the valve from the cylinder when required. Alternatives used historically such as cones based on silver and lead still pose an exposure risk due

to the well-known hazards associated with them, current alternatives are all based on PFAS.

- PTFE thread sealing tape is also used in equipment for cryogenic and low temperature service as well as in many other connections of gas production equipment. To remove the use of PTFE used in such a way the compressed gases industry will be required to make significant capital investments to replace equipment.
- PFPE based lubricants are widely used in gas equipment for greater resistance properties in oxidizing atmospheres and under high pressure conditions. Introduction of PFPE based lubricants has led to a significant reduction in the occurrence of oxygen ignitions within the compressed gases industry. It is important to note that only very small amounts of the lubricant are applied during manufacture with strict controls in place to reduce workplace exposure.

Due to the properties of PFAS these are important compounds within the compressed gases industry and have enabled the industry to improve the safety of its processes and products. We therefore request that the use of PFAS within the compressed gases industry is allowed until an alternative is developed and approved, once it is confirmed that the alternative offers the same level of safety. Without an alternative already available it is impossible to estimate the length of time this process will take. We would request that if a timeframe needs to be stipulated the industry will need a derogation time of at least 13.5 years in line with other relevant industry sectors, but that this timeframe should be reviewed regularly and an extension given if required.