



Brussels, 15th July 2021

Reference: Forthcoming REACH restriction proposal on per- and polyfluoroalkyl substances (PFAS)

PU Europe, the European Federation of polyurethane insulation manufacturers, represents the interest of one of the most efficient insulation materials available on the market.

Our industry supports the European Green Deal and the headline objectives of the Chemicals Strategy for Sustainability (CSS), but we take the pen today to highlight to you a possible negative development in relation to pre-legislative REACH activities on per- and polyfluoroalkyl substances (PFAS, also known as the “forever chemicals”).

Firstly, you must know that the use of blowing agents¹ in the production of rigid PU foam is critical to achieve the exceptional insulation properties of our products. For certain applications, in-situ manufacturing of bespoke insulation and discontinuous production lines, a selection of Fluorinated gases are used as blowing agents. Committed to make EU regulations success stories, our industry is right now finalising its transition to two low Global Warming Potential (GWP) substances: HFO-1336mzz-Z and HCFO-1233zd-E².

Then, in spring 2020 a call for evidence on the use of PFAS was launched by Germany, the Netherlands, Norway, Sweden and Denmark, and their [entry to the Registry of Restriction Intentions has been released today](#). A “group” of substances approach, relying on a broad definition of PFAS (including F-Gases), has been chosen and this is a source of concern for our industry.

With this letter, PU Europe would like to draw your attention to the potential consequences that an unaltered scope of the PFAS restriction, which inaccurately grant persistency and bioaccumulation properties to all the substances covered and considered to be PFAS, could have for our industry and the European Union objectives. We understand the will of legislators to address substances that ultimately degrade into TFA (trifluoroacetic acid and its salts), however scientific literature reports that this is not the case for HFO-1336mzz-Z and HCFO-1233zd-E³.

PU Europe will continue to make its case to the five REACH Competent Authorities for the two above mentioned substances not to be covered by the final restriction proposal, as

¹ Blowing agents are used to produce a cellular structure during a foaming process. Those gases remain trapped inside the closed foam cells minimising in this way the heat transfer. This enables the blowing agent to positively impact foam properties, including the insulating value.

² Ahead of the 2023 deadline set in the Fluorinated Gas Regulation for the HFCs phase down, our industry has already almost completed its transition from HFC-365mfc and HFC-245fa to HFO-1336mzz-Z and HCFO-1233zd-E and mixtures. Those two substances present the advantage of having 99% lower GWP a nearly zero ODP (Ozone Depletion Potential).

³ Theoretical TFA yield assumed to be below 4% and 2% respectively.

this could potentially stop the manufacturing and use of several key insulating solutions. This would not only translate into an important negative economic impact for our sector but would also be detrimental in the fight against greenhouse gas emissions since there are limited alternatives that can offer the same level of performance, from ease of use, mechanical and moisture resistances to high insulation power.

PU Europe acknowledges the non-disputable role that REACH Regulation has played over the last decades and stands ready to help achieving a higher level of protection of citizens and the environment against hazardous chemicals. Nevertheless rushed through decisions coupled with a blanket approach for PFAS substances risk undermining other objectives of the European Green Deal and the drive for an energy and resource efficient Europe.

About PU Europe:

PU Europe is the European voice of the polyurethane (PUR / PIR) insulation industry. The 110 manufacturing sites and more than 20,000 direct jobs in the PU rigid foam sector contribute to tackling the carbon footprint of the buildings stock responsible for around 36% of the CO₂ emissions of the European Union. The lifetime of our products is usually over 50 years and the average European market share of PUR/PIR is estimated to stand slightly over 10%. More information about us via www.pu-europe.eu and lobbying transparency register ID number 27993486325-38.