

Ad-Hoc open BCR Meeting – PFAS Restriction - 28/02/2023 in FPS premises

1. Please fill in this questionnaire if you want to present a topic during the Ad-Hoc PFAS meeting :

The document should be send back before 13th March 2023 to:

██████@health.fgov.be and Cc: @health.fgov.be

It will help us to frame the agenda and organize the discussion on this large restriction.

2. Your presentation should be shared with the Authorities (██████@health.fgov.be and Cc: @health.fgov.be) no later than the 20th March 2023 . The presentation should be maximum 5 slides (the time allowed to each stakeholders will be 10 min max).

3. The final agenda will follow before the meeting including a Teams link to follow the discussion remotely. Registration is mandatory, not registered stakeholders will not be admitted in the room or online.

Questionnaire to send back to the BCR secretariat before the 13 March 2023
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- Do you have remarks on the scope (definition of the PFAS ?)

Per- and polyfluoroalkyl substances (PFAS) are a broad group of chemicals. While some of these have shown to be of concern to human health and the environment, not all the substances in this group exhibit the same toxicological properties.

While fluoropolymers meet the chemical and structural conditions set in the broad definition of PFAS adopted by the Organisation for Economic Co-operation and Development (OECD), their properties and range of applications are fundamentally different. As it stands, the restriction proposal puts very different substances in the same basket, treating safe molecules such as fluoropolymers in the same way as harmful substances. Such an approach goes against the weight of evidence and will have massive societal implications given the extremely wide range of applications of fluoropolymers.

- Please indicate your sector and describe briefly the Restriction impact/influence on your sector.

Gujarat Fluorochemicals Limited (GFL) is one of the leading producers of Fluoropolymers globally and will see its economic activity unjustifiably threatened by the restriction proposal.

As ECHA restrictions are intended “to protect human health and the environment from unacceptable risks posed by chemicals” and because fluoropolymers do not pose an unacceptable risk to humans nor the environment, they should not belong in the ECHA restriction dossier.

- Do you have specific remarks on the restriction text and its exemptions.

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While the dossier contains derogations for certain applications of fluoropolymers, those are very specific, time-limited, and therefore do not reflect the deep differences between fluoropolymers and other substances.