

Views of FPP4EU on opportunities and challenges of PFAS regulatory measures for the chemical industry



[Redacted Name]
Executive Director Halogens Industry Sector,
European Chemical Industry Council (Cefic)

Covering a complex sector

A solution-oriented organisation

To group or not to group

Call for collaboration



Introducing FluoroProducts and PFAS for Europe

PFAS are defined as substances that contain at least one fully fluorinated methyl (CF_3 -) or methylene ($-\text{CF}_2-$) carbon atom (without any H/Cl/Br/I atom attached to it).*



3M

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ARKEMA

BASF
We create chemistry



Chemours™

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DUPONT™

ExxonMobil

GFL™
GUJARAT FLUOROchemicals
VALUE THROUGH GREEN CHEMISTRY

MERCK

synthomer

GORE

* <https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e18663449b>



Introducing FluoroProducts and PFAS for Europe



Vision – in a nutshell

We seek to aid EU policymakers in achieving the ambitions set out in the EU Green Deal.

We understand and support the need for balanced regulatory action on PFAS.

Aim is to come jointly to a final regulatory measure which:

- *is science-informed, implementable, and enforceable;*
- *enables the EU to meet its Green Deal, economic and other policy objectives.*

Our plans:

- *obtain common understanding of what a PFAS restriction under REACH may look like,*
- *support further research and data generation to fill potential data gaps,*
- *collaborate and engage in constructive dialogues with all EU stakeholders.*



The upcoming REACH PFAS restriction

Very complex dossier on hundreds of substances with diverging properties, used in many applications across an extended value chain.

- Exact definition and scope?
- Will PFAS be grouped?
- What about 'missed uses'?
- Which (type of) data waiving proposals will be accepted?
- Stakeholder meetings?



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We focus on finding solutions...

**Management
Committee**



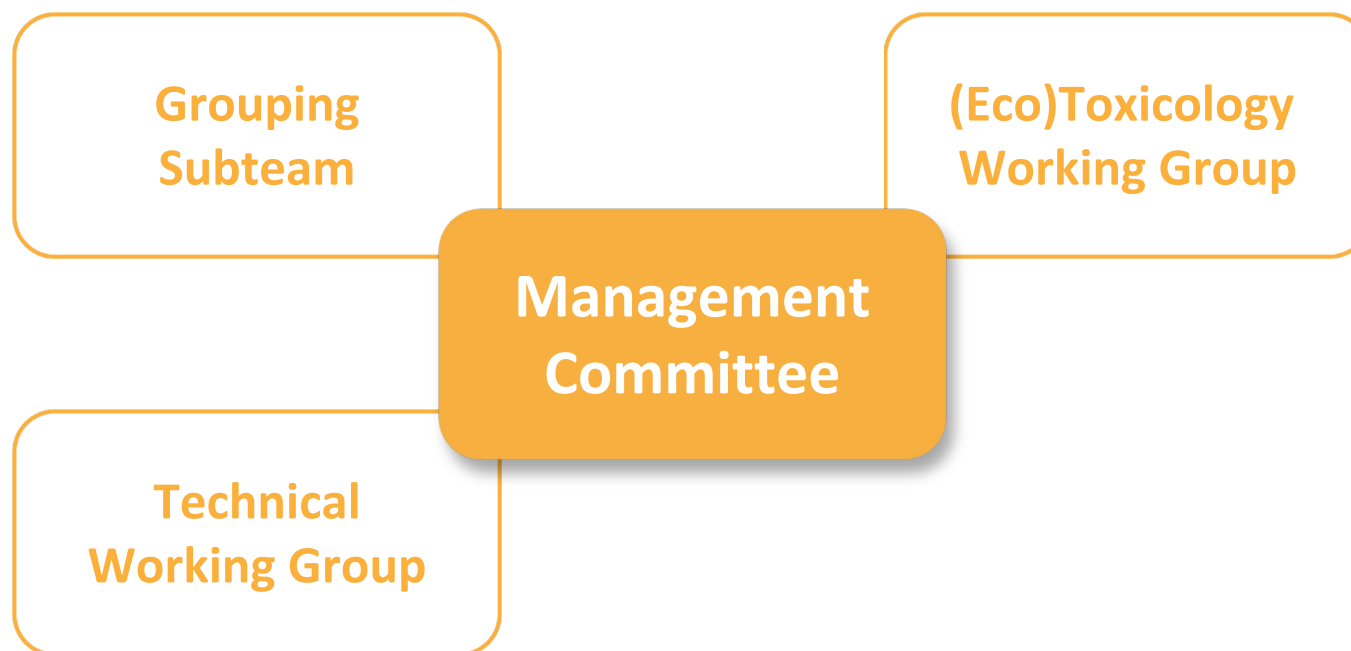
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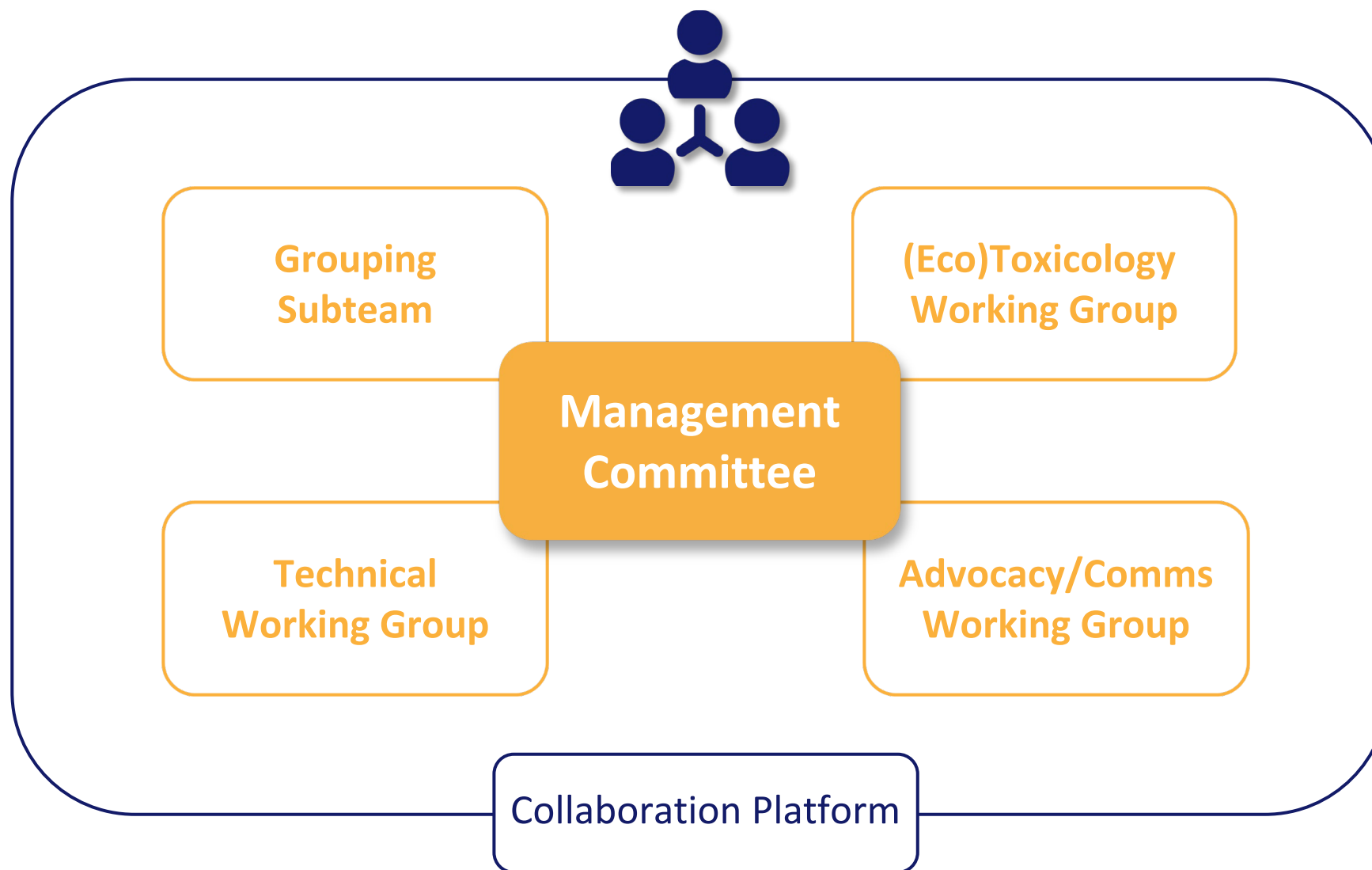
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We focus on finding solutions...



... in collaboration with others

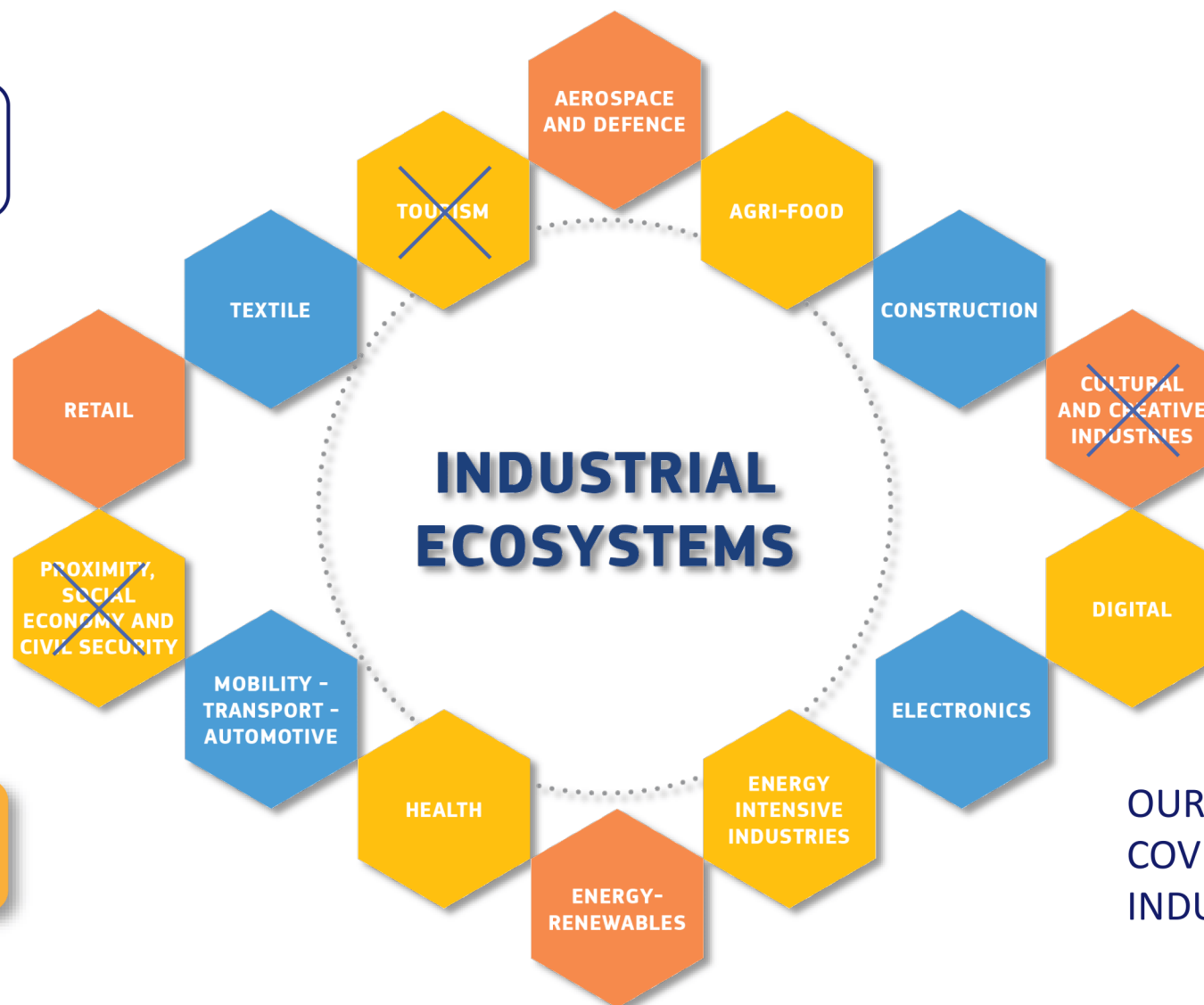
Collaboration Platform



> 60 members

Join us !

██████@cefic.be



OUR DOWNSTREAM USERS
COVER THE MAJORITY OF
INDUSTRIAL ECOSYSTEMS!!

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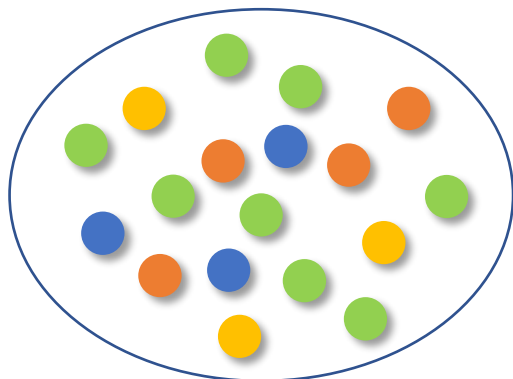
Call for collaboration



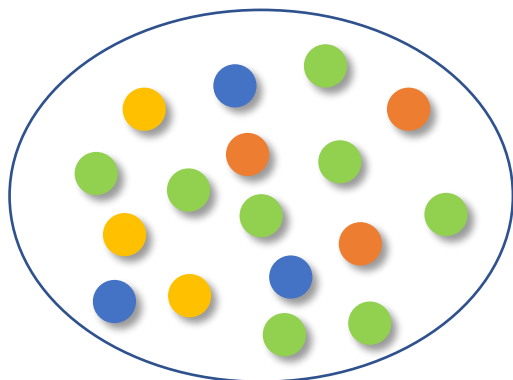
Upcoming restriction : can grouping work?

Take a glance at this hypothetical situation

Chemical class A



Chemical class B



- Non-persistent, no specific hazards identified
- Acute Tox 4, Persistent, Aquatic Chronic 2
- STOT RE 2, Mobile, Acute Tox 4
- Acute Tox. 4, Skin Corr. 1A, Aquatic Chronic 3

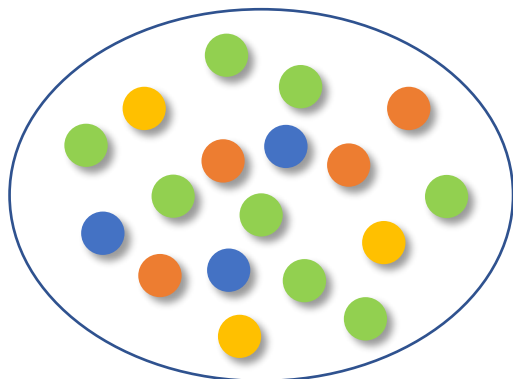
There are combinations of properties
(not just one property) to be considered



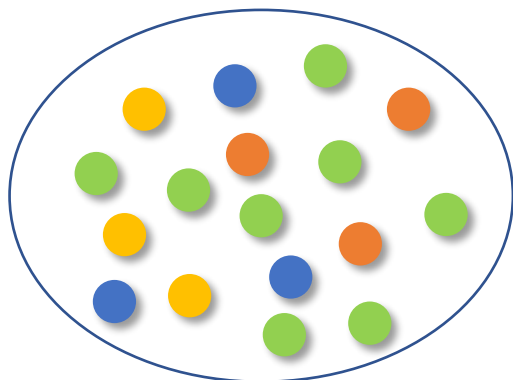
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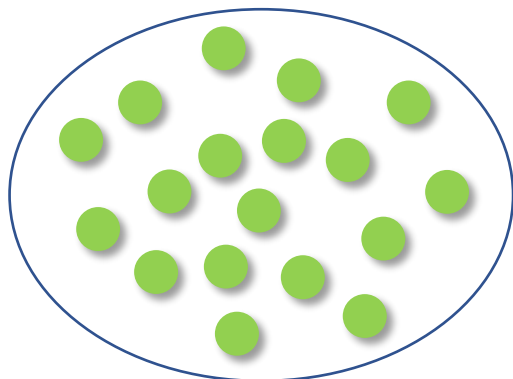
Our conclusion :
Grouping in chemical classes does not help



Upcoming restriction : can grouping work?

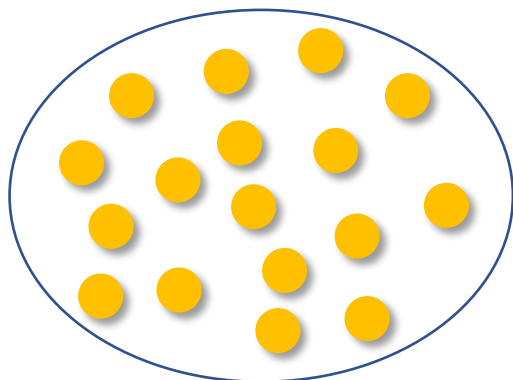
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Science-based class X



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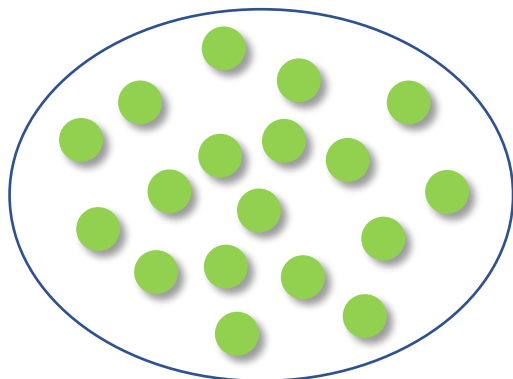
Science-based class Y



Upcoming restriction : can grouping work?

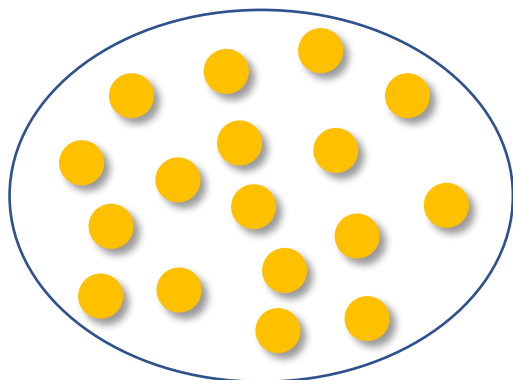
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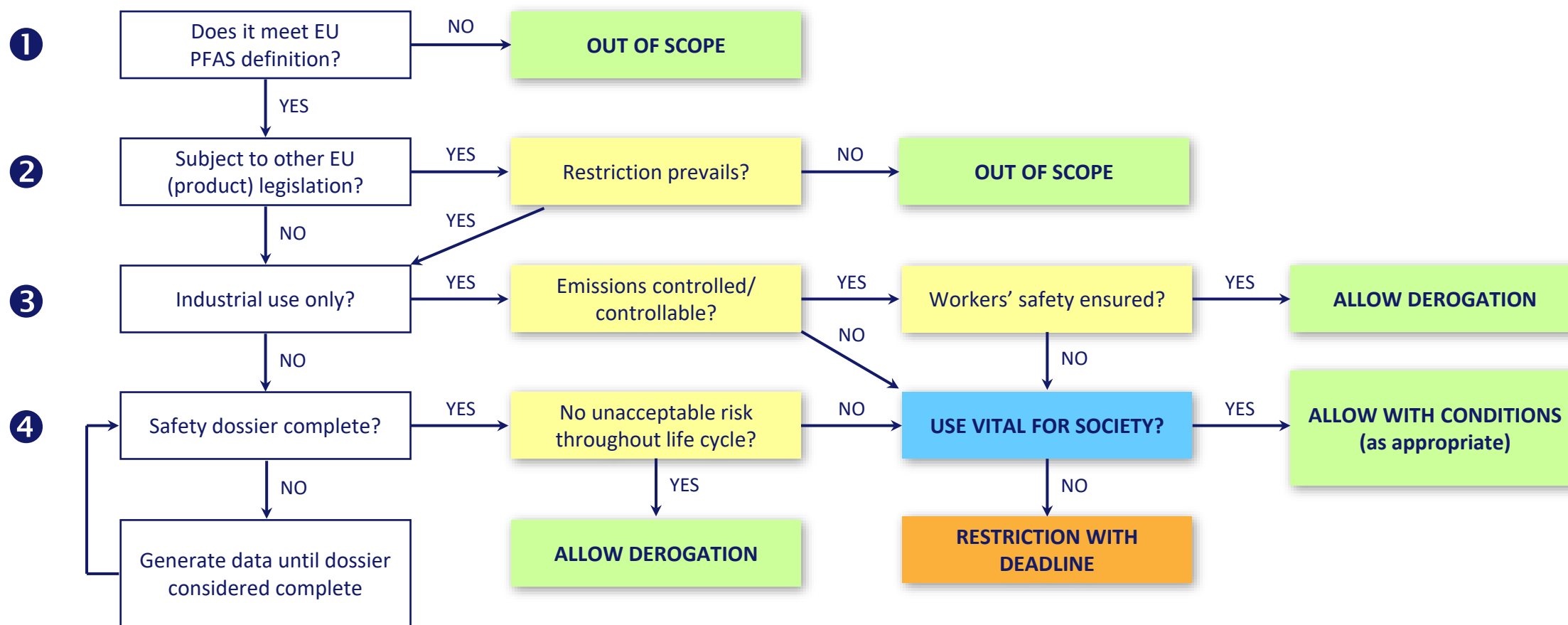
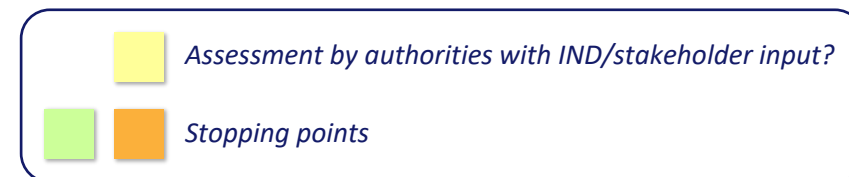
Our conclusion :

Science-based classes are too complex to be clearly defined



Upcoming restriction : can grouping work?

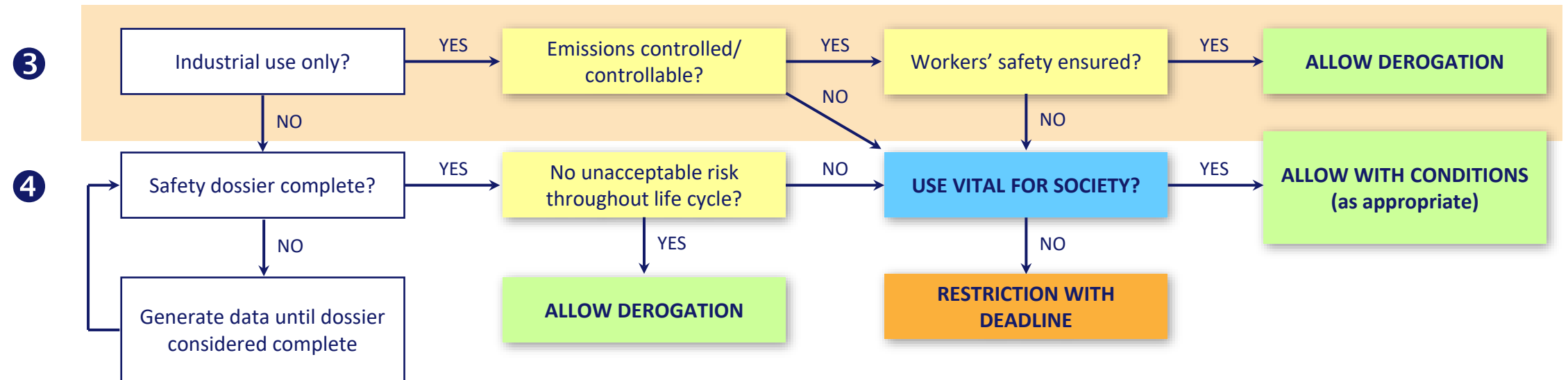
FPP4EU supports the idea of a decision tree



Upcoming restriction : can grouping work?

FPP4EU supports the idea of a decision tree

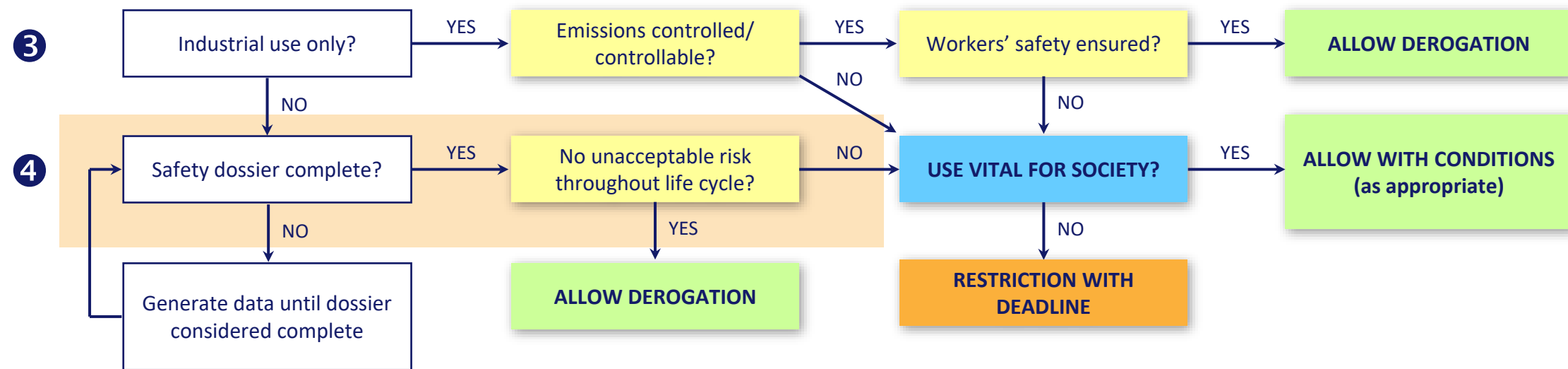
- Industrial uses versus PFAS ending up in consumer products/ articles



Upcoming restriction : can grouping work?

FPP4EU supports the idea of a decision tree

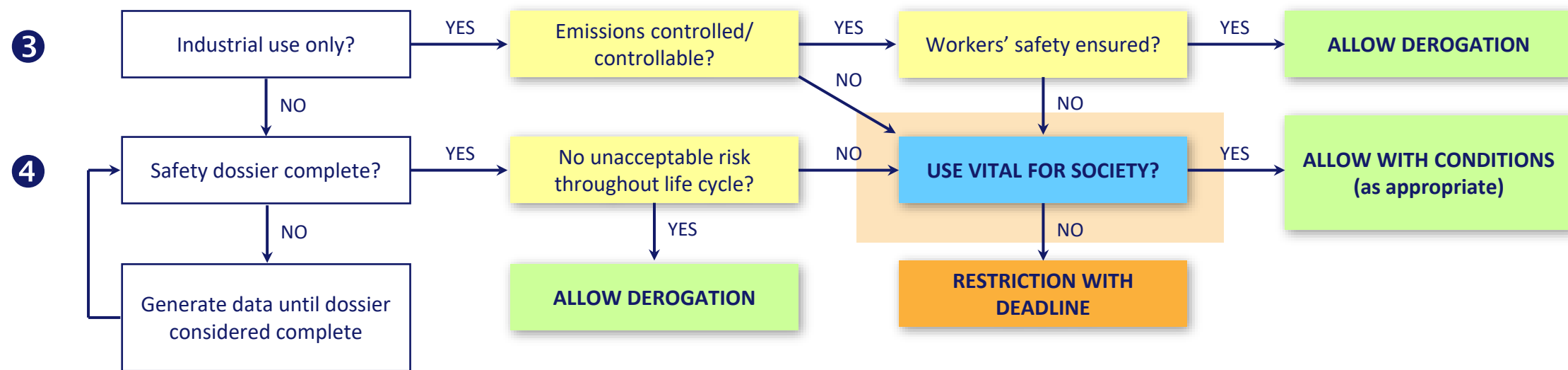
- Risk assessment linked to function/ use/ exposure patterns and based on important properties/ features:
 - Physico-chemical properties, incl. size/molecular weight, physical state, Kow, etc.
 - Presence in the environment (different media)
 - Official status of PBT, CMR , ED, ...
 - Human data, New Approach Methodologies (NAMs) for risk assessment and read-across proposals
 - Potential emissions throughout life cycle (involving DUs)
 - Circularity and end-of-life considerations; appropriate disposal



Upcoming restriction : can grouping work?

FPP4EU supports the idea of a decision tree

- Essential uses idea to be considered
- Companies/ downstream users to include assessments of (absence of) alternatives



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Collaboration is our route to piecing together the puzzle

