



EXCHANGE WITH THE BRC

PROPOSED PFAS REACH RESTRICTION

Fluoropolymers Product Group
7 December 2021

The Fluoropolymers Product Group (FPG)

The Fluoropolymers Product Group represents Europe's leading fluoropolymer producers and experts.

As the voice of the industry across Europe, the Fluoropolymers Product Group advocates for a balanced regulatory environment based on scientific facts to ensure that European industries remain competitive and sustainable.

Part of PlasticsEurope, the group's members are 3M, AGC, Arkema, Chemours, Daikin Chemicals, DuPont, Gujarat Fluorochemicals, Honeywell, W. L. Gore & Associates, and Solvay.



Some facts

- Fluoropolymers are irreplaceable in many uses without reliable alternatives.
- Fluoropolymers are different to other PFAS.
- Fluoropolymers are characterized by their high stability. They do not degrade in the environment when used as intended.
- The main fluoropolymers meet the OECD Polymers of Low Concern (PLC) criteria.
- An industry with responsible manufacturing at its core.

WHY FLUOROPOLYMERS ARE CRITICAL TO BELGIAN COMPETITIVENESS AND INNOVATION ?



Irreplaceable fluoropolymers

ONE-OF-A-KIND POLYMERS

Fluoropolymers are **unique chemical substances** used across **numerous technologies, industrial processes and everyday applications** from the aviation industry to transportation, medical devices and energy production and technical apparel.

With a **unique set of properties**, they are durable, chemically inert and mechanically strong. Fluoropolymers help to **keep us safe** and **enable innovation**.

WHY DO WE USE FLUOROPOLYMERS?

- Ensure **safety, reliability and performance** across a variety of sectors
- **Low-risk** polymer for human health & environment
- Help drive **EU industry competitiveness and innovation**
- Critical to numerous technologies **enabling the Green Deal**, reducing waste and emissions
- **Few**, if any, **viable alternatives**



Uses of fluoropolymers

- Promoting **sustainable and smart mobility** through **electric vehicles**.
- Extending the lifespan of medical equipment and devices, **reducing the need for replacements, risk of failure and cross infections**.
- Enabling a **data driven economy** through the manufacturing of microprocessors and **semi-conductors**.
- Facilitating the **Renovation Wave** and the **construction of energy efficient buildings**.
- Driving **innovation** and **helping decarbonise the aviation industry**.
- Assisting the **chemicals industry** in **preventing corrosion in harsh environments**.
- Ensuring **food and pharmaceuticals** remain **fresh and uncontaminated**.
- Protecting **workers** in **professional protective and high-performance clothing**.

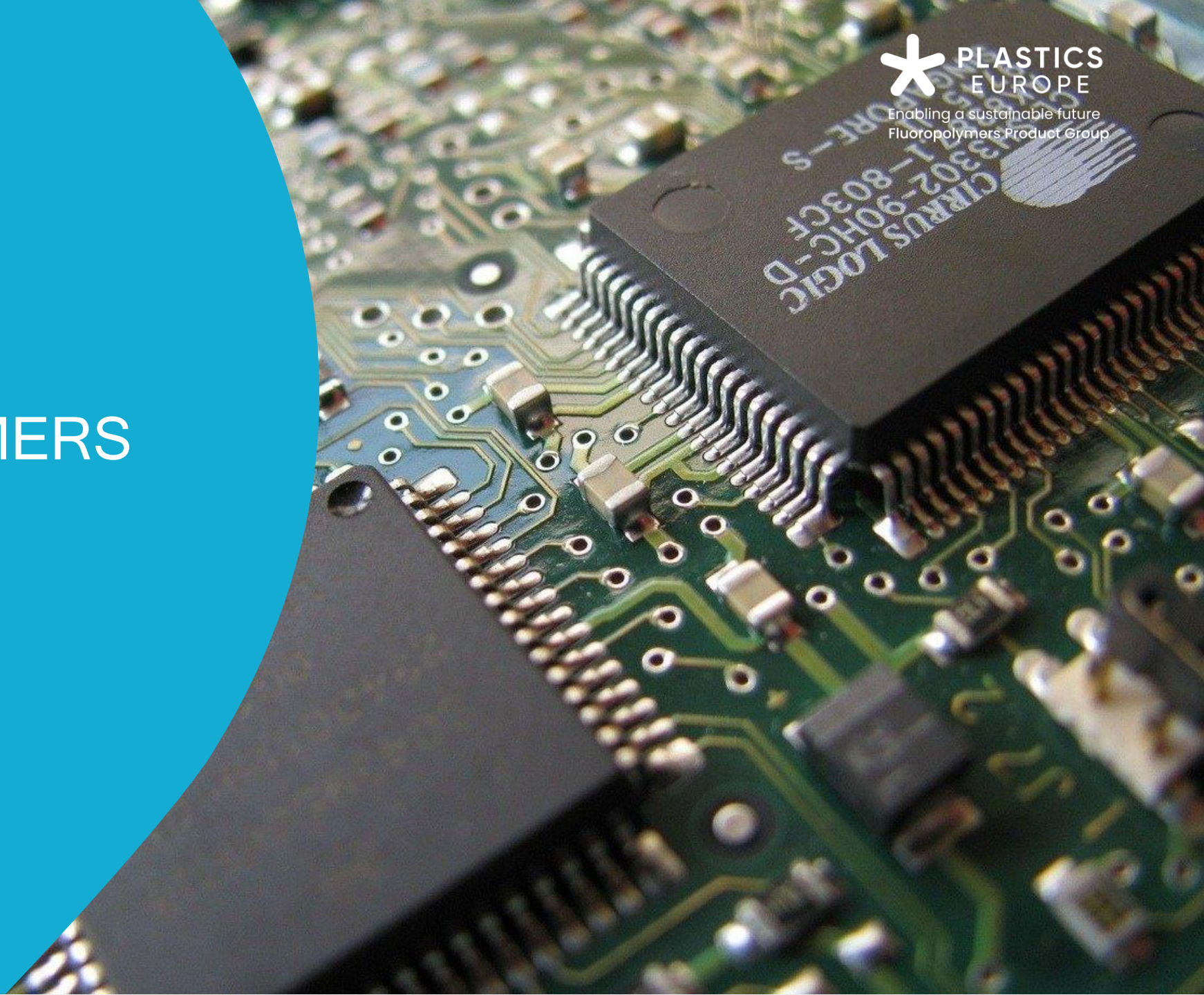
Fluoropolymers in Belgium

Cutting-edge Belgium economic sectors including:

- The chemical industry
- The pharmaceutical industry
- The machinery and equipment
- The manufacture of transport equipment

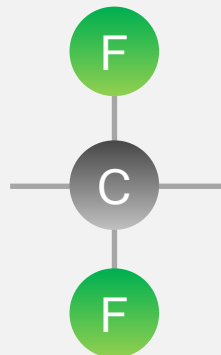
rely on the unique set of properties unobtainable with other polymers and critical for their growth and innovation.

HOW ARE FLUOROPOLYMERS DIFFERENT TO OTHER PFAS?



PFAS have many different properties

SIMILARITIES



1 fully fluorinated carbon
or $\text{CF}_2\text{-CF}_2\text{-CF}_2\text{-}$
or ...



GASES



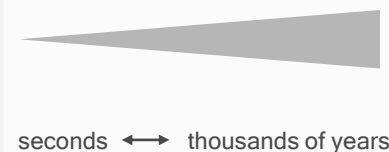
LIQUIDS



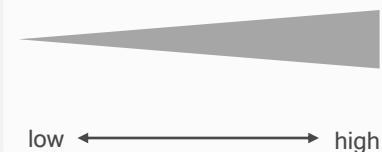
SOLIDS

DIFFERENCES

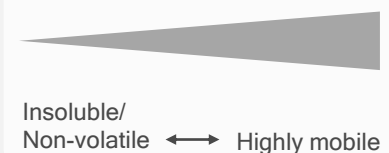
Stability



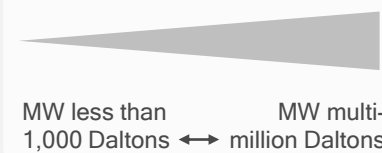
Toxicity



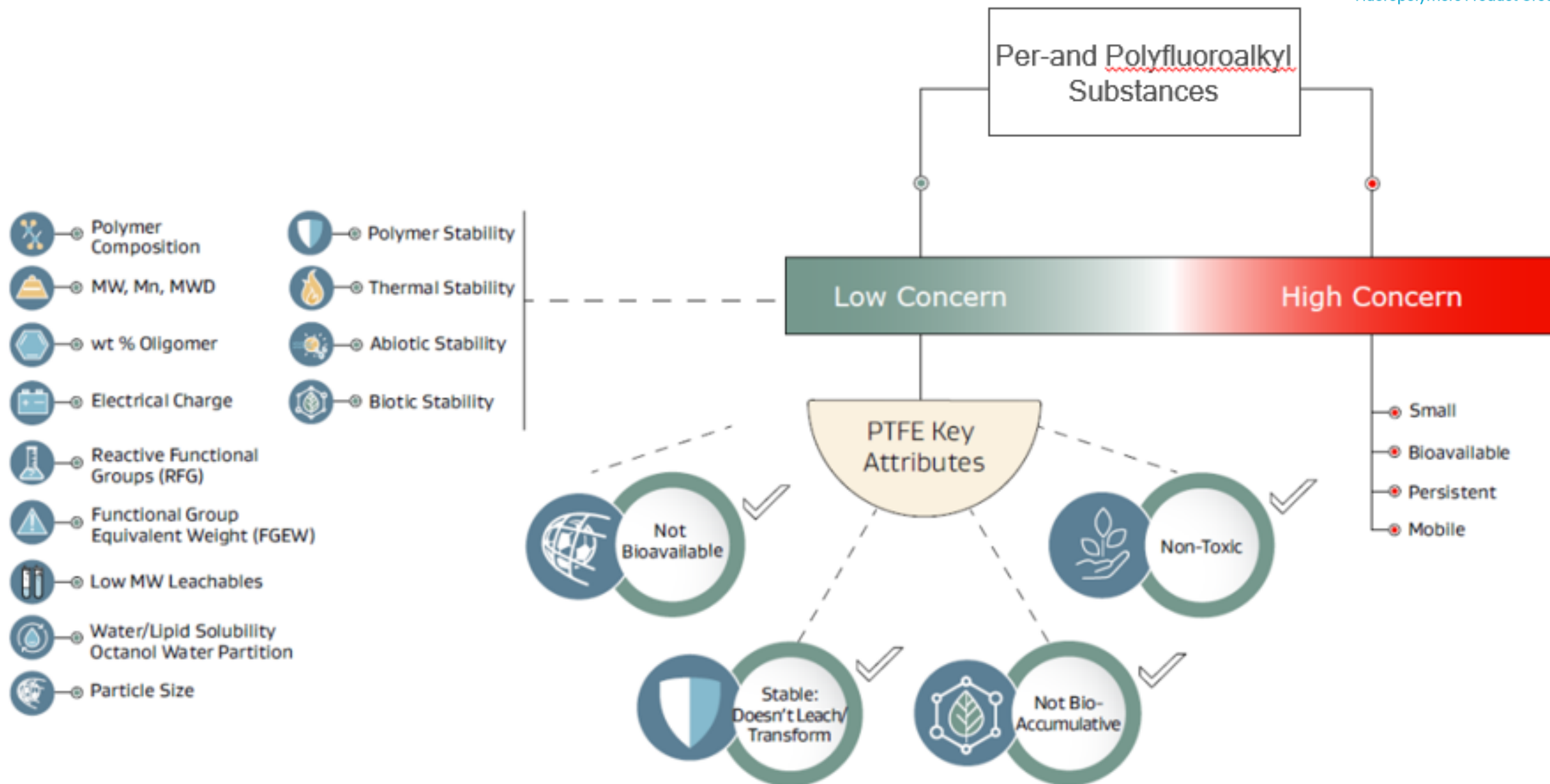
Mobility



Size



Fluoropolymers are different - Example of PTFE





The challenge

Five member states are looking for an universal restriction that would include all PFAS.

Two main issues

GROUPING

“Although fluoropolymers can be categorized as PFAS based on their structure, their properties are distinctly different from other PFAS substances. This broad and diverse family of substances should not be grouped all together”.

ESSENTIAL USES

“Essential use should not be used as a tool for EU chemicals regulation until a concept has been sufficiently debated, challenged, assessed and approved by stakeholders”.

HELPING THE EU
REGULATORS TO
TAKE DECISIONS
BASED ON FACTS
AND EVIDENCE



RMOA key takeaways

1 EU GREEN DEAL

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Association of Plastics Manufacturers
Fluoropolymers Product Group

A full PFAS REACH restriction would put at risk key applications that are necessary to ensure competitiveness of the EU industry, as well as the very ambitious goals set forward by the European Green Deal.



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FPS, along with their relevant monomers, should be derogated from the PFAS REACH restriction. The use of polymerization aids should also be allowed by regulators to enable continued EU manufacture of FPS.



2 PFAS REACH RESTRICTION

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3 INDUSTRY COMMITMENT

The industry should commit to efficiently address the concerns related to the manufacture and purity of FP products and pursue R&D programs for the advancement of technologies allowing for the replacement of PFAS-based polymerization aids and their implementation when proven technically feasible, environmentally sound and viable.

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EU legislation dealing with industrial emissions and waste should be reviewed and updated to ensure that adequate technical controls are put in place to minimise any risk

4 EU LEGISLATION

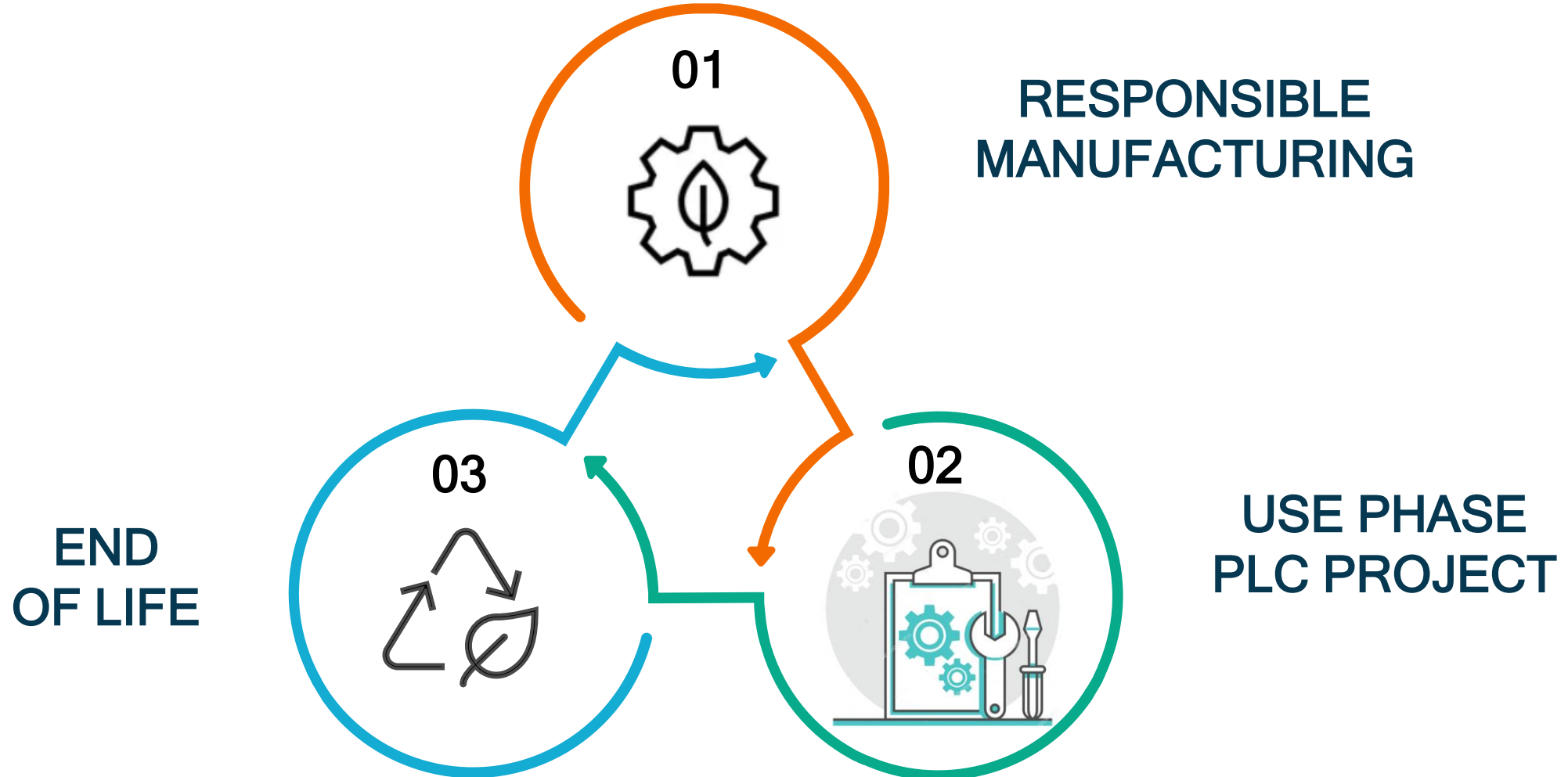
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5 COMPETITIVENESS

It is expected that any regulatory action that may lead to limiting the market access for fluoropolymers could result in the complete relocation of this industry outside the EU.

fluoropolymers.plasticseurope.org/

Development of data and evidence on fluoropolymers



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