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Brussels, 6 May 2020



BY EMAIL ONLY

Subject: EU POP amendment on PFOA, its salts and related compounds

Dear [REDACTED],

I wish to address you with regards of an urgent matter on textile products and the relevance of C8 chemistry for the current and projected health protection needs.

Last year, during the PFOA restriction in REACH/Stockholm Convention/EU POP amendment, EURATEX with its Members actively contributed with technical evidence to support the policy making process which resulted in a restriction proposal reflecting several needs expressed by the textile sector. We do appreciate the role played by the Commission in this complex exercise.

Today, the unprecedented crisis caused by the COVID-19 outbreak has exposed the importance and a new global demand for textile products used for safety of healthcare, workers and the wider population. The normal equilibrium between demand and offer no longer applies.

Recently, several Member States have introduced new categories of protective masks and made their use mandatory for citizens or workers. Procurement organisations warn on shortage of gowns both single use and reusable, other medical textiles products are urgently sought.

This unprecedented demand is being addressed by over a thousand of European textile and apparel companies which have reconverted their production to supply protective mask of different types, gowns and other textile products. Such demand is also stressing the supply chain, reducing the availability of non-woven materials, which are widely used for medical textile products, and requiring the industry to utilise alternative materials and also finishing.

EURATEX, in particular has learned that finishing textiles with fluorochemistry still plays a key role in offering high protection from droplets. Companies currently rely on C8 chemistry because of the highest effectiveness, low application and low emissions (in comparison to C6 chemistry); furthermore, applying finishing with C8 chemistry in reusable medical textiles does not require reimpregnation after washes to the extent needed by its closest alternative C6.

EURATEX understands that the process to update the EU Regulation on POP has already largely explored the needs of stakeholders both at UN and EU level. However, the global situation and the demand for textile products to protect workers and the wider population have completely changed in just about two months.

At this stage, the demand for protective textiles is projected to remain high well beyond the current year.

We must therefore reflect on the current draft of EU POP amendment on PFOA which will create new obstacles to the European production of protective textiles, particularly masks of all types, gowns and other medical textiles.

The derogation under 5(e) for membranes for medical textiles does not cover masks and gowns which fall under the scope of Regulation (EU) 2017/745 and face a significantly shorter transition period in new derogation 9(a): from initial 2032 to December 2020.

To face an unprecedented public health crisis and to facilitate, instead of jeopardise, the European production of protective masks, gowns and other medical textiles (both woven and non-woven) with the highest level of performance, EURATEX urges the European Commission to grant a derogation under EU POP amendment on PFOA for:

- **protective masks, gowns and other medical textiles until 4 July 2023**

Trusting on your full appraisal of the needs expressed above, we remain at your disposal for further discussion and any clarification you may need.

Sincerely

