

POSITION PAPER on the BROAD PFASs RESTRICTION

Proposal for a Restriction on the Manufacture, Placing on the Market and use of PFASs

The European Organisation for Security (EOS), as the representative of the European Industrial and Research Security Community, welcomes the European Chemical Agency's (ECHA) [proposal for a ban on per- and polyfluorooalkyl substances \(PFASs\)](#) and the opportunity to comment on it through a public consultation.

EOS supports the ECHA's efforts to safeguard the health and environment of millions of Europeans by ensuring that so-called "forever chemicals" are less present in every-day life.

However, EOS is concerned that the security sector is not included in the list of exemptions of the current proposal, which in its current form would have a negative effect on our industry, especially in some highly niche applications, and by extension to European security. Our members play a key role in ensuring the security of public spaces/urban security and securing critical European infrastructures such as ports, airports or land border crossing points. They also help police and customs authorities detect explosives, drugs or other illegal goods, preventing those substances from entering the European Economic Area zone.

Screening equipment such as biometric scanners, x-rays, metal detectors, cabin baggage scanners, etc. and optical chemical detectors are using materials containing PTFE (Teflon) parts, fluoroelastomers (FKM, FFKM or fluoro-rubber) and several other groups. Those chemicals are typically used for their high resistance to heat and chemicals and flexibility/compressibility and degradation. In addition, chemical detection often uses PTFE (or other fluoropolymer) tubes, which are essential materials for chemical processing industries from medical science to the Petrochemicals industry (both of whom are recognised and have several derogations present in the ECHA proposal). Other uses include seals in 1,000 application types.

On top of those general applications, our industry also has some "niche" applications with very specific characteristics such as vapour chemical detection. Vapour detection combines the material 'cleanliness' requirements of the medical industry to be able to detect trace amounts (invisible to the human eye) with likely specific relationships with other chemicals, such as 'permeability' – how easily one substance passes through the other. Because of these highly bespoke requirements, akin to if not exceeding those of much of the medical industry, this "niche" but critical part of our sector would require even more time to transition away from PFAS.

For the time being, there is no suitable alternative to those substances that would meet the same properties while being flexible enough to fit into all our devices. In addition, security screening devices are heavily regulated and must meet very specific requirements to ensure the highest level of detection of threats and illegal goods, which add to the complexity in finding alternatives. As explained above, this would have a great impact on **security equipment used for urban security, ports and borders and aviation security.**

Therefore, banning the use of PFAS for this security equipment within the timeline set out in the proposal would result in our sector being virtually unable to operate, as we would not be allowed to manufacture but also maintain/repair threat detection equipment that are currently securing in European Economic Area's borders and infrastructures. In practise that would mean a return to frisking and detection dogs as the main prevention method, leading to a major reduction in threat detection rates and dramatically increased passengers/goods crossing time. Additionally, without security equipment, the EU would not be able to achieve important security objectives laid out in various strategies, frameworks and communications where security equipment and industry is paramount (European Integrated Border Management Strategy, Schengen Borders Code, Strategic Compass for Security & Defence, etc.).

EOS believes that the security sector, and in particular, manufacturers of equipment used for urban security, ports and borders and aviation security, should be included in the derogations that are currently envisaged by the ECHA, in light of the absence of suitable alternatives to fluoropolymers and the socio-economic impact such ban would have on the EU society. Consequently, we invite the ECHA to consider a 12-year derogation to the use of fluoropolymers in the security sector, which would allow manufacturers enough time to find, test and certify alternatives, thereby avoiding regrettable substitutions. This need is further strengthened by the fact that fluoropolymers are considered to have a much lower risk profile compared to most other PFAS substances, which resulted in the UK government proposing to exempt them, as well as other low hazard groups, from its upcoming PFASs restriction. For now, the security sector is not mentioned in the EU proposal, which brings a lot of uncertainty to industry and the wider transport ecosystem.

Additionally, we would like to highlight the importance for the ECHA to consider the spillover effect a ban on a given sector might have on other ones, even on those that get a derogation. In particular, we are concerned about the absence of derogation for digital and electronics components that are essential to our systems (and will become even more in the future). Difficulties for those suppliers to find alternatives before the ban enters into force could result in major supply-chain disruptions in the security sector and make it potentially impossible for us to manufacture some of our equipment.

Finally, note that EOS members will be submitting further technical and scientific information to the ECHA as a response to the public consultation and encourages other security equipment manufacturers to do so as well.

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