

European Chemicals Agency

Date: 2023-09-25

Telakkakatu 6
00150 Helsinki
Finland

PFAS Restriction proposal ECHA/NR/23/04

Assessment of EWA TC Health and safety equipment for welders

Dear all,

The European Welding Association (EWA) is an industrial association which comprises national associations and manufacturers of arc welding and cutting equipment, welding consumables, flame welding and cutting equipment and allied processes and health and safety equipment for welders from across Europe.

EWA is registered to the the EU Transparency Register (id number 711840531940-21)

EWA has 4 technical committees composed by the best European experts of each member on the different aspect of the technology:

- o Welding/brazing consumable materials (short TC-C)
- o Arc welding/cutting equipment (short TC-E for MMA, MIG-MAG, TIG, Plasma welding and cutting, submerged arc)
- o Flame equipment (short TC Flame for cutting, welding and brazing)
- o Health and safety equipment for welders (short TC-HSE)

The focus of our work in the TC HSE is on the topic of the protection of welders and very particularly welding fumes. With the respective experts from the member companies, we develop information on protection against welding fumes and its possible health-endangering consequences for welders. In addition to capturing the welding fumes as close as possible to the point of origin, a high degree of separation of smoke particles from the extracted air is crucial to protecting workers. Some commonly used welding processes, and cutting processes, especially plasma cutting, produce large amounts of smoke that must be extracted and filtered out. In addition, the welding fume particles are very small, typically less than 1 µm, and often only in the range of a few nanometre.

Therefore, the filters used must not only achieve a high degree of separation efficiency, but also be cleanable. This in turn requires the particles to be separated as directly as possible on the filter surface. Filters with a PTFE membrane on the surface of the filter media are particularly suitable for this. That's why many manufacturers use these filters to separate large quantities of the finest dust. These filter media are certainly not among the cheapest on the market and that is why everyone is looking for alternatives. But so far there are no equivalent filter media on the market for this application.



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We are talking here about an application of PTFE in the form of a filter membrane, which is only used in the commercial sector. At the end of their useful life, which can be several years, the filter elements are currently disposed of as hazardous waste or commercial waste, depending on the application. Of course, this could also be specifically regulated. This material does not end up in the environment in an uncontrolled manner or in private household waste.

Since many of the member companies represented in the TC HSE would be affected by a ban, we have asked our members to take part in the ECHA survey as affected companies themselves. Only the companies themselves can provide information about the quantities used and the specific significance for their products. Nevertheless, we would also like to request from the EWA TC Health and safety equipment to provide an exception to the ban on use for PTFE in the form of filter media. We include an information brochure for information about the European Welding Association. Thank you for your thoughtful review of our application.

Best regards,

A handwritten signature in black ink, appearing to read 'Manfred Könnig', with a long horizontal stroke extending to the right.

Manfred Könnig
(Chair of EWA TC HSE)