

Meeting with ESBAF on PFAS restriction

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ESBAF (European Small Business Alliance for Fluoropolymers): Tanja Gal (CEO of a family-owned SME)

KEMI: Jenny, Mattias

ESBAF formed in May this year as a response to this restriction proposal. 9 members.

Preparing a submission to the PC. Focusing on downstream SME users.

SMEs throughout the supply chain in between chemical producers and the end users.

PC submission will not focus on fluoropolymer hazards etc. Focus instead on impacts for SMEs and the difficulties for SMEs to implement the restriction.

Derogations primarily concern end-uses. Difficult to see how these derogations related to uses of FPs in the supply chain.

Spare parts not always stocked by end-users, instead stocked by suppliers.

Waste management?

- SMEs in these sectors are familiar with proper waste management but dependent on information.

Information in supply chain?

- Generally, a knowledge problem. SMEs often do not know they have FPs.
- No CLP requirements for FPs.
- Information requirements lead to high levels of bureaucracy for SMEs.
- Especially challenging for custom made articles.
- Distributors usually have the relevant information. Distributors can sell to different parts of supply chain. Can be challenging for them to keep track of what the end use is.
- Conflict with NDAs in some cases, yes. Especially in more sensitive sectors, like defense and security.

Time and resource constraints prevents ESBAF from providing full SEA.