

REVISION V2 - 16 JULY 2020

The current revision includes additional information in Q4 and Q5 – see Annex I

To whom it might concern

Dear Sir/Madame,

SUBJECT: REACH initiative - Five European states call for evidence on broad PFAS restriction

The European Fluorocarbons Technical Committee (EFCTC)¹ would like to call your attention that the national authorities of Germany, the Netherlands, Norway, Sweden and Denmark have invited interested parties to send in evidence and information on the use of per- and polyfluoroalkyl substances (PFAS) by 31 July 2020. For further information see the [ECHA website, PFAs section](#).

The call for evidence request includes producers, suppliers and distributors **and downstream users**.

Why is this relevant to HFCs, HFOs and HCFOs? The definition for PFAS used by the survey includes any substance that has a CF₂ group or a CF₃ group. We take the view that this definition far exceeds the traditional definition of PFAS, but is still important to submit evidence in this respect.

The survey is a very broad, covering a wide range of substances and polymers, and seeks to establish as one of its objectives how these substances are used and if workers come into contact with them. We all know that through the F-Gas Regulation², there is already considerable information available to the authorities, **but it is essential to communicate the important role of HFCs, HFOs and HCFOs due to their safety and technical properties.**

As the European trade association for the producers of HFCs, HFOs and HCFOs, EFCTC is preparing and will be submitting a detailed reply to the call for evidence which details the environmental properties of HFCs, HFOs and HCFOs, and providing high level information on quantities and uses. We have recently published a position paper “Per- and Polyfluoroalkyl Substances: HFCs and HFOs a distinct subset” which is available here in the [EFCTC website, position paper section](#).

EFCTC would ask you to reply to this call for evidence and would ask you to complete the relevant questions for your activities in the online survey. As an aid to this we have drafted general answers to the most relevant questions (attached). We have also attached a spreadsheet that lists the relevant individual substances and CAS/EINECs numbers.

The survey can only be completed [online here](#). It is listed as PFAS under current consultations.

In conclusion, this is the first stage in a process and this is our first opportunity to comment. We believe that it is essential that the authorities should be made aware of the important role of HFCs, HFOs and HCFOs, and the care taken by industry using them responsibly to take advantage of their safety and technical properties.

¹ <https://www.fluorocarbons.org/>

² https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2014.150.01.0195.01.ENG

We therefore call on you to participate in the survey and thank you in advance for your cooperation.

Kind Regards,
Angelica Candido
EFCTC Sector Group Manager

Annexes

Annex I: EFCTC recommendation to the questionnaire

Annex II: EFCTC substances CAS and EINECs numbers

Annex III: PFAS Survey Questionnaire – (blank)

Useful links

German RMOA-List and Public Consultation website:

<https://www.reach-clp-biozid-helpdesk.de/DE/REACH/Verfahren/SVHC-Verfahren/Stoffliste-EN/Stoffliste-EN.html>

ECHA website - call for evidence on broad PFAS restriction:

<https://echa.europa.eu/sv/-/five-european-states-call-for-evidence-on-broad-pfas-restriction>

EFCTC website:

<https://www.fluorocarbons.org/>

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