

My company is a specialty wire manufacturer located in China. In order to meet our hard disk drive and medical customers' application requirement, our wire will be added with PFPE (CAS#69991-67-9) or PTFE micro-powder (CAS#9002-84-0) as **lubricants** for our customer processes and is a component on their products.

We know PFPE and PTFE are PFAS and belong to EU proposed restriction. However our PFPE and PTFE material suppliers tell us that their products fluoropolymers and perfluoropolyethers are sub-group of PFAS in low risk category that is meeting the Polymer of Low Concern (PLC criteria) and because of the highly unique of properties and high levels of performance, there are no alternatives for replacement. They said their products should be excluded from the scope of the EU restriction proposal or exempted by way of a time-unlimited derogation for all uses. So they are now working with ECHA's committees to provide necessary information, data or evidence for exemption or derogation.

Then my company has following some questions, pls help answer us

- 1) If our PFPE and PTFE material suppliers have applied successfully the EU PFAS restriction exemption or derogation on their material, does it mean my company not need apply exemption or derogation on our product "wire"?
- 2) If our PFPE and PTFE material suppliers have applied successfully the EU PFAS restriction exemption or derogation on their material, does it mean my company can keep use the materials on our "wire" manufacturing and can supply "wire" to our hard disk drive and medical customers worldwide even the EU PFAS restriction law entry into force?

On the other hand, we find the material PFPE (CAS#69991-67-9) and PTFE (CAS#9002-84-0) belongs to use sector "**Lubricants**" (Annex A Appendix A.3.15). Thus "Lubricants" are proposed to have 13.5 years derogation (ban with a transition period of 18 months and a 12-year derogation), table 9 of Annex XV restriction report.

Therefore

- 3) Does it mean my company not need apply exemption or derogation on our product "wire" and still can keep supply our wire to our hard disk drive and medical customers worldwide even the EU PFAS restriction law entry into force?

If answers of above questions are not require my company apply exemption or derogations by our own, below 2 items can be ignored, vice versa

- a) pls provide guideline how to apply the exemption or derogations
- b) Any consultant service can be offered for exemption or derogations?