



Baden-Württemberg


Minister of the Environment, Climate
Protection and Energy Sector
Baden-Württemberg


Minister of Economic Affairs, Labour and Tourism
Baden-Württemberg


Minister of Social Affairs, Health and
Integration
Baden-Württemberg


State Secretary at the State Ministry and
Representative of the state of Baden-Württemberg
to the European Union

Member of the European Commission
Commissioner
Thierry Breton
European Commission
Rue de la Loi 200
1049 Brussels

15. September 2023

Contribution of the State Government of Baden-Württemberg to the Consultation on
the PFAS restriction proposal under the REACH regulation

Your Excellency,

With the enclosed statement, the State Government of Baden-Württemberg is
contributing to the public consultation on the PFAS restriction proposal under the
REACH regulation.

The State Government is fully aware of the problems associated with perfluorinated
and polyfluorinated alkyl substances, PFAS for short. PFAS are persistent and remain
in the environment for decades. They can have adverse effects on humans and the
environment. Furthermore, PFAS are now considered ubiquitous throughout the world,
i.e. they can be found in all environmental media. For this reason, it is both correct and
vital that the discharge of PFAS into the environment is prevented or minimised.

In this context, potential impacts on society-relevant applications, such as in medical technology and patient care, fuel cell technology, semiconductor technology or in the field of renewable energies, must also be considered and taken into account.

Using medical technology as an example, it is clear that without PFAS, functional properties will be lost unless alternative materials or treatment methods are developed. In addition, the industry fears that urgently needed medical products, such as endoscopes or implants, would probably no longer be manufactured in Europe.

Therefore, the State Government advocates a differentiated regulatory framework. It is clear that the risks to human health and the environment must be adequately regulated, thereby ensuring a high level of protection for humans and the environment. At the same time, however, there must be transitional provisions and adequate exemptions in areas where there are no substitutes. In addition, research into the development of alternative materials and treatment methods must be intensified.

In this ongoing process, the State Government calls for an intensive dialogue with the companies and business associations concerned, as well as with the healthcare sector and environmental associations, in order to be able to comprehensively assess the consequences of the regulation on the economy and society.

A copy of this letter is also being sent to EU Commissioner Virginijus Sinkevičius and EU Commissioner Stella Kyriakides.

Yours sincerely,

[Redacted signature]

[Redacted name]

[Redacted address]

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[Redacted name]

[Redacted address]