

PFAS □□□

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Content:

Request for exemption

Org. name:

Quzhou Dongye Chemical Technology Co., Ltd.

General Comments:

Our company is a trader of fluorinated fine chemicals, and we would like to greet the five countries that have proposed the ECHA and PFAS control draft. Our company has always made unremitting efforts to comply with domestic and international regulations, and continuously conducts strict self review of the compliance of products exported to the European Union. The main agent sales of electronic fluoride solution involve products such as hexafluoropropylene oligomers and hydrofluoroether, targeting domestic and foreign customers. We provide electronic fluoride solution as a composite raw material for enterprises to use in precision instruments, electronic etching, immersion cooling, and other fields. The company strictly follows environmental requirements in its business activities, and the PFAS substances involved will not be discharged into the environment.

The electronic fluoride liquid products sold by our company do not belong to the chemicals listed in the "Hazardous Chemicals Catalogue" (2015 version). The upstream manufacturer has entrusted Zhongke Testing Technology Services (Jiaxing) Co., Ltd. for testing, with an ODP value of 0 (as required by Jingzhipin Technology and as an alternative to ozone depleting substances HJ/T225-2005) and a GWP value of 120 (Climate Change 2013-IPCC (100th year)).

In the data center, air-cooling and cooling powerful servers requires expensive costs, consumes a large amount of electricity, and is detrimental to the environment and economic budget. But immersive liquid cooling using electronic fluoride solution can significantly reduce energy consumption costs, while increasing server density and reducing data center size.

In the field of semiconductor manufacturing, small temperature fluctuations may have a significant impact on yield due to their high precision requirements. Compared with traditional coolants, fluoride solution has a wider operating temperature and requires less maintenance. Even if there is a leak, it will not damage electronic devices or chips.

Starting from the implementation of the ban, an 18 month transition time is not enough. Despite our current efforts to find alternative solutions, the identification of alternative materials for existing products is complex and requires a lot of time, and there is no suitable alternative material that can meet all required performance requirements. Due to the characteristics of electronic fluoride solutions, many downstream applications cannot find products with the same effect to replace them. If forcibly prohibited, it will inevitably bring huge economic losses and a huge impact on high-end industries.