

Opinion on the Restriction and Lack of Alternatives for Per-and Polyfluoroalkyl Substances

We are a specialized manufacturer and processor of various products made from Polytetrafluoroethylene (PTFE). In light of the proposed restrictions on products containing per- and polyfluoroalkyl substances (PFAS) by the European Chemicals Agency (ECHA), we would like to express our opposing viewpoint.

PTFE material boasts properties such as high-temperature resistance, low-temperature resistance, corrosion resistance, aging resistance, self-lubrication, and excellent insulation. These characteristics have led to its application in various major fields including aerospace, high-speed rail, new energy vehicles, electronic copper-clad laminates, semiconductor container liners, chemicals, machinery, medicine, healthcare, and construction.

In the products manufactured by our company Jiashan East Fluoroplastic Co.,Ltd.,fluorinated materials are integral. Notably, our aircraft engine wear-resistant self-lubricating seals, which have been approved, exhibit high-temperature resistance up to 250 degrees Celsius and low-temperature resistance down to -160 degrees Celsius. They maintain their self-lubricating properties without lubricating oil under harsh conditions and retain their sealing integrity in various high and

low-pressure scenarios. To date, there is no substitute available.

Our company produces various aircraft seals with the following performance requirements: resistance to high and low temperatures, UV resistance, weather resistance, lubricating oil resistance, radiation resistance, and deformation resistance. There is currently no alternative worldwide. Similarly, the semiconductor container liners and fittings we manufacture require properties such as strong corrosion resistance, non-aging, high insulation, and non-deformation. No replacement material has been identified. Our production of copper-clad laminate electronic membranes demands corrosion resistance, high-temperature resistance, and high insulation. Again, there is currently no alternative material. Likewise, our medical stent membranes require properties such as biocompatibility, chemical stability, non-aging, and self-lubrication. These also lack substitutes. Furthermore, our chemical pipe sealing products necessitate properties such as corrosion resistance, high and low-temperature resistance, and elasticity without deformation. There are currently no superior alternatives available.

If the use of fluorinated material products were restricted in the aforementioned industries and there were no alternatives available, the impact would extend beyond the economy of a single nation. It would severely affect economic development across various sectors worldwide and potentially result in widespread unemployment. With the inability to

ensure livelihoods, global security would be compromised, leading to instability and potential conflict.

In view of these potential consequences, Jiashan East Fluoroplastic Co., Ltd. urges ECHA to implement long-term exemptions for sectors where viable alternatives are currently lacking.

Jiashan East Fluoroplastic Co., Ltd.

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