



PFAS RESTRICTION PROPOSAL

Ad-hoc BCR on PFAS-restriction proposal
28/03/2023

PFAS and textiles

- Technical textiles, medical and PP applications require fluorinated substances as there are critical uses that need to **fulfill the highest degree of safety and performance standards** imposed by public or private customers
- C6 (PFHxA) is the **only technical feasible and available alternative** to the already restricted C8 that can deliver water, oil, chemical and dirt repellence

PFHxA restriction proposal vs PFAS restriction proposal

- **SEAC acknowledged the need to have derogations for critical uses in textiles**
 - Cfr. Opinion on an Annex XV dossier proposing restrictions on undecafluorohexanoic acid (PFHxA), its salts and related substances
(8 December 2021)
- However, PFAS restriction proposal **disregards some of these derogations**, which are really “essential uses”

Critical uses acknowledged by SEAC (1)

- **Personal protective equipment** intended to protect users against risks as specified in Regulation (EU) 2016/425 of the European Parliament and of the Council, Annex I, Risk Category III (a), (c), (d), (e), (f), (h), (l)
- **PFAS restriction proposal more restrictive:**
 - PPE cat III (a) and (C)
 - Unless for firefighting activities : cat III (a)->(m)
- **BUT also derogation needed for cat (j)**
(cuts by hand-held chainsaws)



Critical uses acknowledged by SEAC (2)

- Personal protective equipment specifically designed for armed forces and in the maintenance of law and order and protective clothing specifically designed for armed forces and in the maintenance of law and order or other emergency response workers;
- PPE designed for armed forces and the maintenance of law and order are not in the scope of PPE regulation
- Separate derogation is needed (cfr PFHxA) which is not foreseen in the PFAS restriction proposal



Critical uses acknowledged by SEAC (3)

- Medical devices as specified in Regulation (EU) 2017/745 of the European Parliament and of the Council; woven, knitted and nonwoven medical textiles as specified in Regulation (EU) 2017/745 of the European Parliament and of the Council with a minimum performance requirement of >20 cm hydrostatic head according to EN 13795; in vitro diagnostic medical devices as specified in Regulation (EU) 2017/746 of the European Parliament and of the Council as well as parts thereof;
- **PFAS restriction proposal more restrictive:**
 - Only wound treatment is proposed
 - **What about surgical fabrics such as surgical drapes and gowns?**



Critical uses acknowledged by SEAC

- **High visibility clothing** fulfilling the requirements of EN ISO 20471 Class 3;
- **Not foreseen in the PFAS restriction proposal**



Conclusion

- How will the PFAS restriction relate with the PFHxA restriction?
- PFHxA (C6) is crucial to meet the standard/requirements
- Derogations acknowledged in PFHxA restriction should also be valid for PFAS restriction!



THANK YOU



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