

PFAS Opinion Letter

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Content:

Apply for exemption

Org. name:

Quzhou Dongye Chemical Technology Co., Ltd

General Comments:

Our company is a trader of fluorine containing fine chemicals, and we would like to express our greeting to the five countries who have proposed the ECHA and PFAS management and control draft. Our company has always made unremitting efforts to comply with domestic and international regulations, and continuously conducts strict self review on the compliance of products exported to EU. We as an agent mainly sell electronic fluoride solution, involving the products such as hydrofluoroether to the customers at home and abroad, providing electronic fluoride solution as a composite raw material for the enterprises to use in precision instruments, electronic etching, immersion cooling, etc. Our company strictly abides by the environmental requirements in its business activities, and PFAS substances involved will not be discharged into the environment.

From the perspective of chemical safety, hydrofluoroether has no flash point, which is non flammable. However, after defluorination, C-F bond is changed into C-H bond with a flash point. The rapid rise of immersion liquid cooling technology in Data Center worldwide has promoted the research and application of cooling liquids. Data Center are strategic resources and new infrastructure that support modern economic and social development. Liquid cooling improves cooling efficiency through liquid circulation heat exchange, which can significantly reduce the total energy consumption and carbon dioxide emissions of the Data Center, meeting the low-carbon development requirements of the Data Center in our country.

Fluorocarbon is a type of organic compounds obtained by exchanging some or all of the hydrogen contained in hydrocarbon into fluorine. They generally have good comprehensive heat transfer performance, which can be non flash and non

combustible. They are widely used as heat dissipation media in Data Center, 5G base stations, etc. However, its GWP value can reach thousands, while HFE has a lower GWP value, which is a good candidate to replace perfluorocarbon heat transfer fluids. From implementation of the ban, an 18-month's transition time is not enough. Despite our current efforts to find alternative solutions, identification of alternative materials for existing products is complex, which needs a lot of time, and there is no suitable alternative material that can meet all the required performance requirements. Due to the characteristics of electronic fluoride solutions, many downstream applications cannot find the products with the same effect to replace them. If it is forcibly prohibited, it will inevitably bring great economic losses and tremendous influence on high-end industries.