



Portable Electric Tool Manufacturers' Association

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21 September 2023

Proposed restriction of around 12,800 per- and fluoroalkyl substances (PFAS) under Annex XV of REACH

PFAS are widely used by the Portable Power Tool Industry in components such as:-

- Batteries, in separators, binders, gaskets, seals, electrolytes
- Electrical motors and combustion engines
- Lubricants, coatings and greases of surfaces, to e.g., reduce friction
- Plastic parts of EEE as fluoropolymers are the most flame-retardant plastics
- Seals and gaskets
- Cables and their sheathing
- Industrial installations and manufacturing equipment

The above list is not exhaustive. There are so many PFAS that there will be some that we have not identified or do not realize are used in components especially those brought from 3rd party suppliers. Identifying them from the supply chain without specific tests would be difficult and expensive.

Some PFAS are highly dangerous while others are benign. A risk based assessment approach would be preferable in determining any restriction on the use of PFAS. Release of PFAS from equipment could only occur when a component is replaced or when it reaches the end of its life. In such cases, this can be managed to ensure the PFAS is not released into the environment and can be safely disposed of, recovered, recycled or reused.

Our position is that there should be an exemption for essential industry uses. A derogation is needed to identify where PFAS are used and to research alternatives.

Yours faithfully



Mr Crispin Dunn-Meynell
General Secretary