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Product description：
PTFE,CAS NO.: 9002-84-0

Requests for exemption：
We request that the above products be exempted from the draft PFAS

Grounds for immunity：
PTFE,CAS NO.: 9002-84-0

Polymers can be determined to be of low concern and require a full exemption from the PFAS ban.

Expand on：

PTFE and non-polymer PFAS are significantly different, classified as PFAS only in terms of molecular structure, their molecular weight is much more than 10,00da, and they cannot cross cell membranes. Their environmental and toxicological data are significantly different from those of most other low molecular PFAS, and they can be classified as low concern polymers according to the OECD standard for polymers of low concern. It should be treated separately from PFAS for hazard assessment or regulatory purposes. We believe that it is unscientific to unify the management of all PFAS as there is no scientific data to prove that PTFE and PTFE raw tape are toxic and pollute the environment, and all PFAS substances should be classified and classified through analysis and research.

Since the 1940s, PTFE raw tape has been widely used in oil, natural gas, high-temperature gas, mechanical pipe seals. For more than 70 years, PTFE raw material belt is easy to use, good sealing performance, not aging, not easy to damage and excellent corrosion resistance is widely used by users, more recent research shows that PTFE has stable chemical properties, non-toxic, biological inefficiency, insoluble in water, recognized as having no obvious impact on the environment and human health. The use of PTFE raw tape has produced significant benefits throughout the industry chain and is an excellent product that cannot be replaced by other materials.

Why can't hemp and other fiber products on the market replace PTFE raw tape?
① The sealing of fiber seals such as hemp silk is not as good as the raw material belt, and the sealing of fiber products such as hemp silk usually needs to be wrapped on the thread or joint,

which may cause small gaps or gaps. These gaps can cause leakage of gas or liquid, resulting in an incomplete seal.
(2) Fiber seals such as hemp silk are easy to be corroded, and some chemicals may erode fiber products, leading to leakage or failure, and reduce the sealing effect.
③ Hemp and other fiber seals can not be used alone, in the thread sealing need to be used with other chemicals, these chemicals used in the water pipe will have a direct impact on the human body.
Fibrous products such as hemp are usually not suitable for sealing under high pressure or high temperature environments. Under these conditions, the hemp may not be able to withstand deformation or rupture caused by high pressure or temperature.
⑤ In history, fiber sealing such as hemp silk is a backward sealing means, and the use of backward technology to replace advanced technology is not in line with scientific laws.

Why can't the sealant on the market replace the PTFE raw tape?
The sealant itself is also a sealing product using chemical raw materials, and its sealing performance is also with a big gap with raw materials.
The construction of sealant is complex, and the application of sealant requires more skilled construction techniques and tools. The coating process may require a specific glue gun or scraper to ensure uniform and continuous coating, and attention needs to be paid to the thickness and uniformity of the adhesive layer during construction.
③ Curing time: Many sealants need a certain curing time to achieve the best sealing effect. This can lead to construction delays and waiting times that are not suitable for those situations that require quick sealing.
Not reusable: Once the sealant cures, it usually cannot be reused or adjusted. If the seals need to be reremoved and reinstalled, a new sealant may need to be reapplied, increasing the workload and cost.
Durability and stability: some types of sealant may lose their original elasticity and sealing performance in long-term use or under the influence of temperature, chemicals and other factors. The sealant may have problems such as aging, falling off, deformation or hardening, resulting in reduced sealing effect and great safety risks.
Chemical compatibility: Different types of sealant may have different chemical compatibility for different chemicals. Some sealants can be eroded by specific chemicals, causing leaks or failure.
⑦ Cost factor: The price of some sealants is higher, especially high-performance engineering grade sealants. In addition, more labor and tools may be required during construction, increasing the overall cost.

In addition, restrictions on PTFE and PTFE raw strips may result in the following risks:
Environmental, health and safety impacts, such as increased safety risks to employees, medical staff and consumers, as well as increased emissions from modes of transport due to technological retrogression, resulting in greater carbon emissions and ecological damage;
The use of alternative materials with lower durability and reliability leads to high maintenance costs and increased replacement frequency, resulting in more waste;

(3) A large number of PTFE-related industries disappeared, a large number of employees in related industries were laid off and unemployed, and many key industries (including automobiles, semiconductors, etc.) were in crisis upstream and downstream.

Based on the above points, it can be seen that PTFE and PTFE raw tape have an important role in social life, and there is no scientific data to prove that PTFE will cause harm to the environment and the human body, and there is no economically viable relevant alternatives, we ask that PTFE and PTFE raw tape be exempted before there is no better alternative, allowing production and use.

Evidentiary material：A critical review of the application of polymer of low concern and regulatory criteria to fluoropolymers

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