

FPP4EU, a Sector Group of Cefic



6 October 2022



[Redacted]
[Redacted]
[Redacted] (Cefic)
[Redacted]
[Redacted] FPP4EU

FPP4EU membership and
organisation

Reflections on the upcoming
wide PFAS restriction

The best way forward is through
constructive collaboration



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FPP4EU membership and organisation

Manufacturers, importers and large users of PFAS in the EU ...

Members:

- 3M
- AGC Chemicals Europe Ltd
- Arkema
- BASF
- Bayer
- Chemours
- Daikin Chemical Europe GmbH
- DuPont de Nemours, Inc.
- ExxonMobil
- Gujarat Fluorochemicals GmbH
- Merck Life Science
- OMNOVA SOLUTIONS/Synthomer
- W.L. Gore



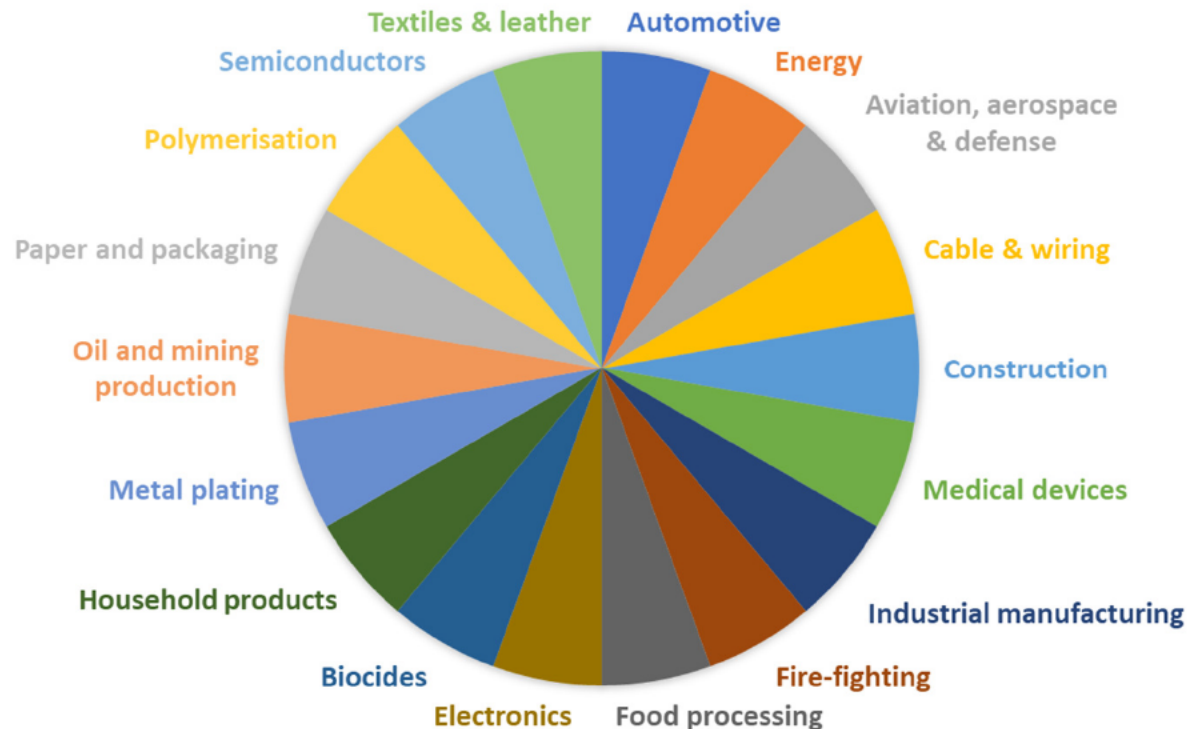
FPP4EU membership and organisation

Manufacturers, importers and large users of PFAS in the EU ...



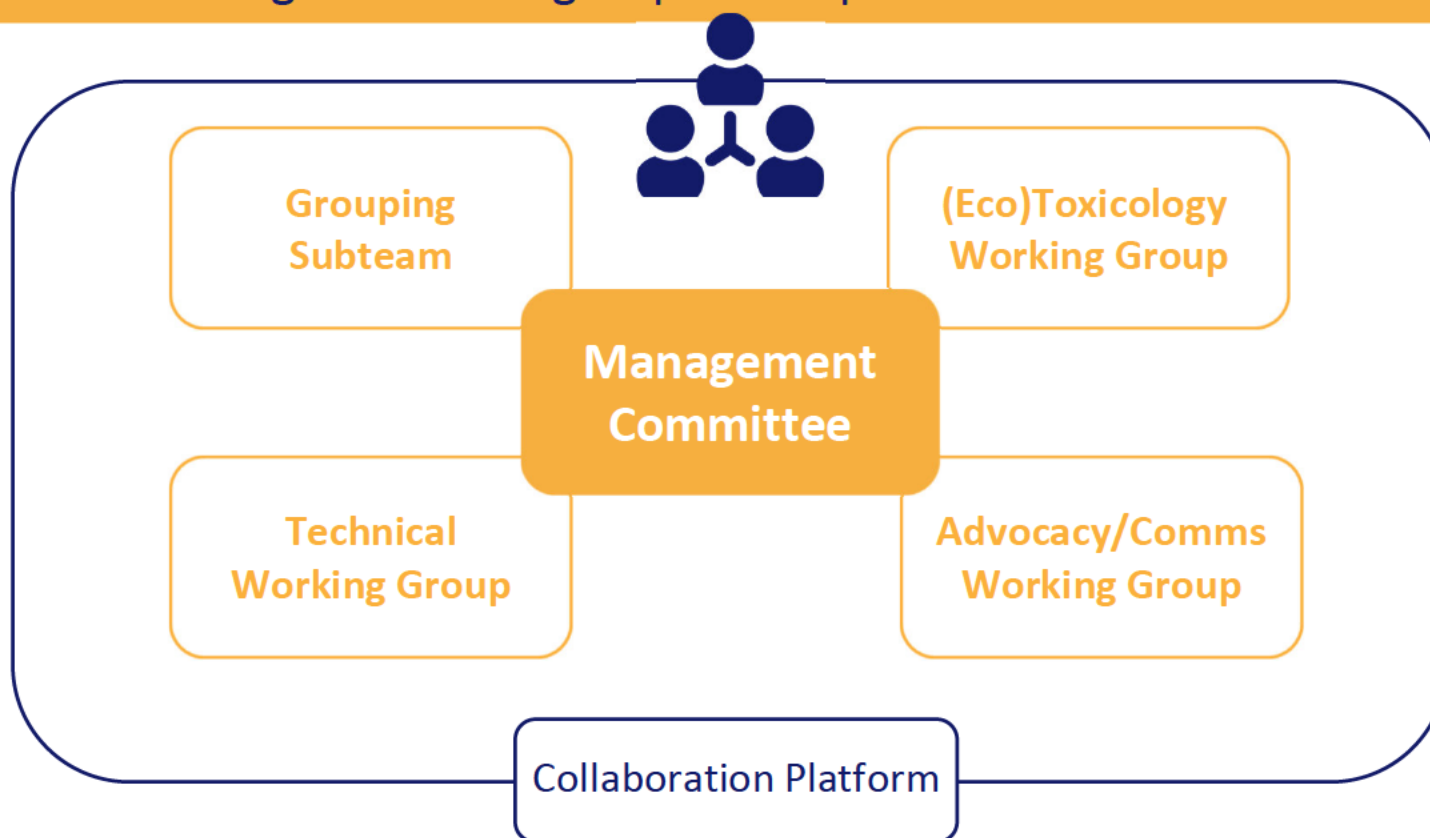
FPP4EU membership and organisation

Manufacturers, importers and large users of PFAS in the EU ...
... liaising with the largest possible part of their value chains

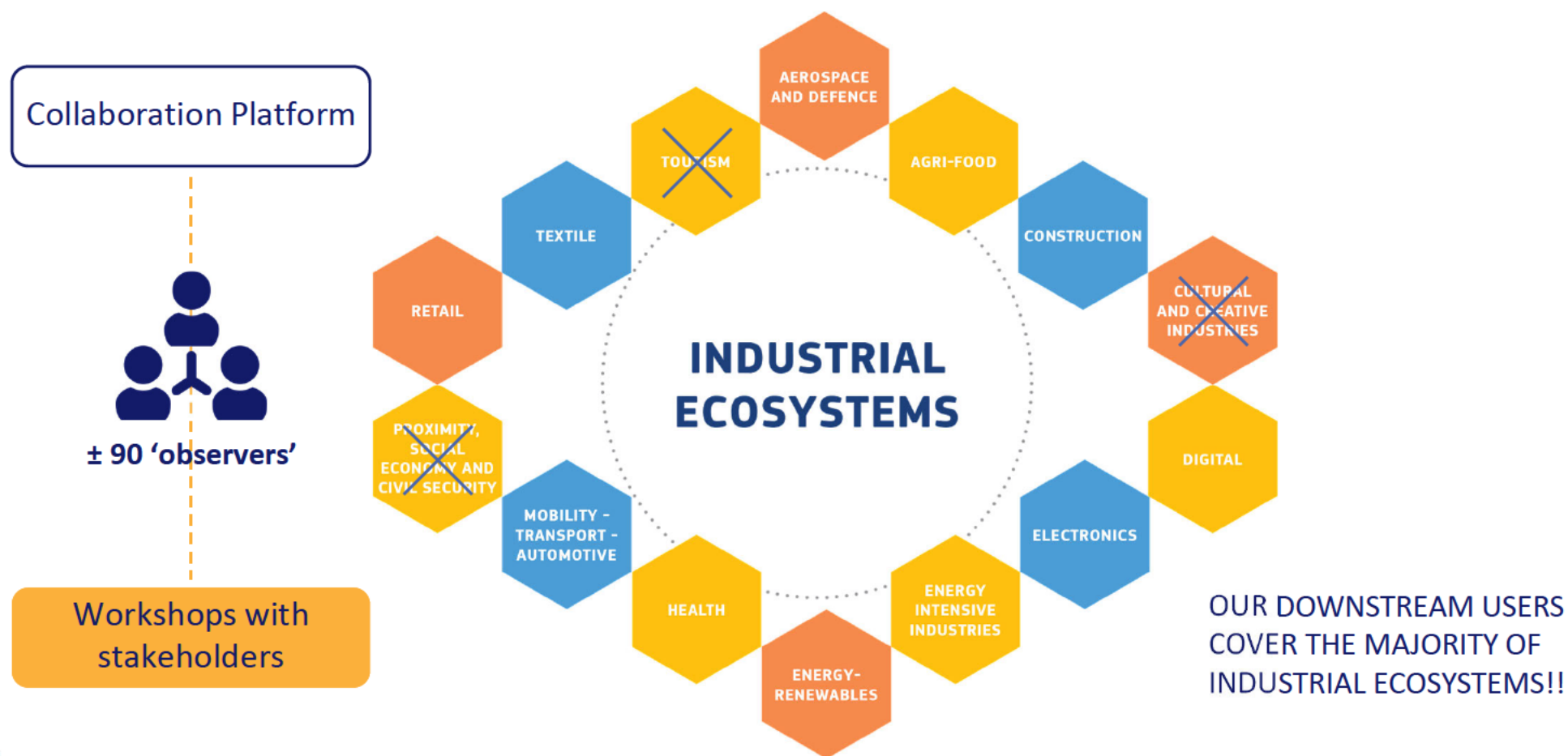


FPP4EU membership and organisation

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... liaising with the largest possible part of their value chains



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FPP4EU looked into grouping in view of the wide restriction

- Discussing the potential end result of the PFAS restriction (**purely hypothetical mock-up!**)

76. Per- and polyfluoroalkyl substances (PFAS) Substances that contain at least one aliphatic $-CF_2-$ or $-CF_3-$ element	1. Shall not be manufactured, or placed on the market as substances on their own from 15 July 2028. 2. Shall not, from 15 July 2028, be used in the production of, or placed on the market in: (a) another substance, as a constituent; (b) a mixture; (c) an article, in a concentration equal to or above 0.1% of a combination of PFAS-related substances. Followed by list of exempted uses and their concentration limits
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Can we make a better proposal for the left-hand column?

→ FPP4EU will not propose specific sub-grouping;
this is left to the concerned stakeholders



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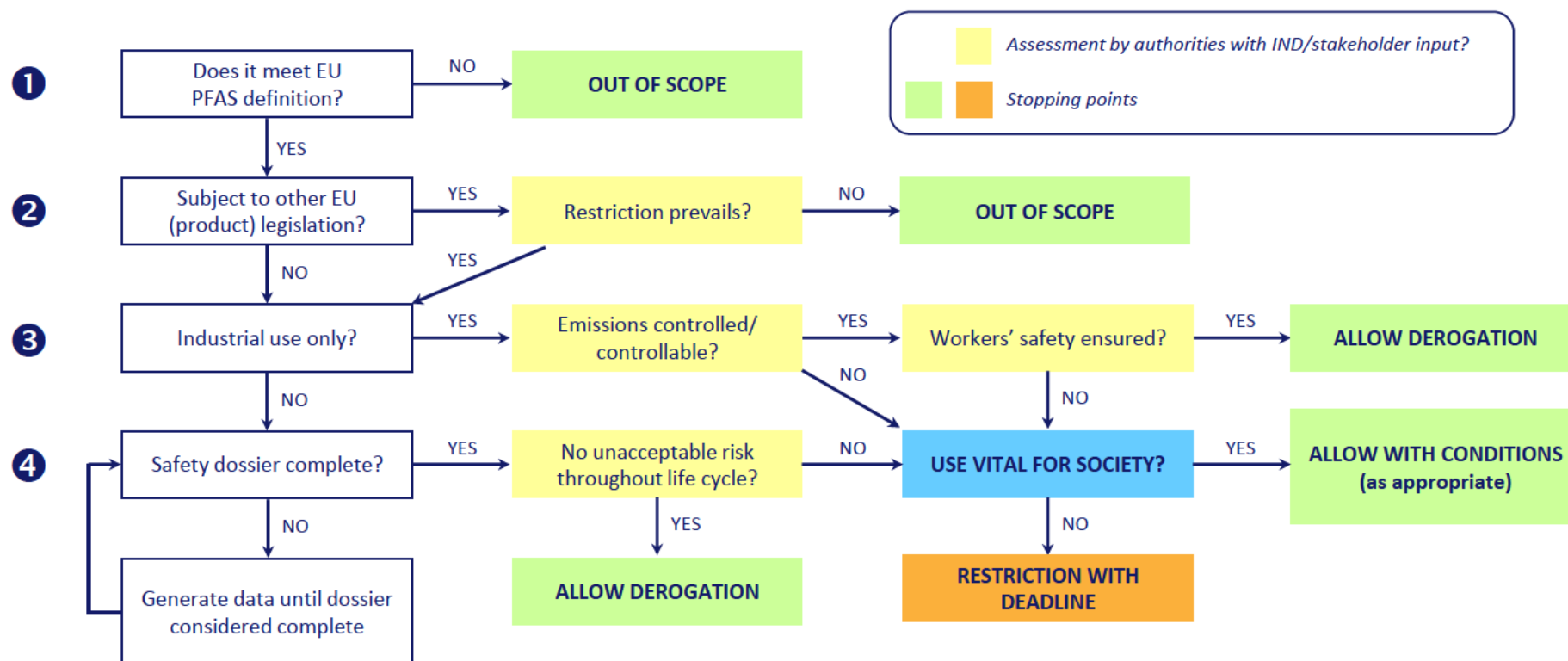


How to define the derogations? Which substances to be derogated in which uses?

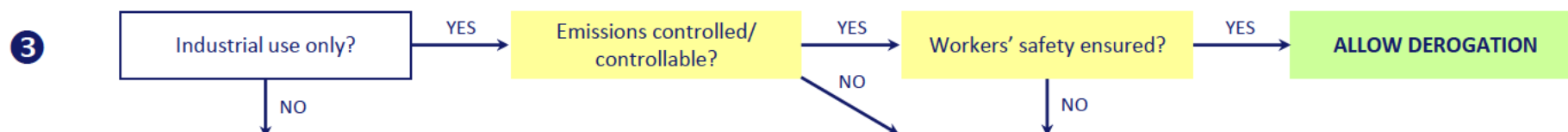
→ **Practical proposal** (making use of a decision tree)



FPP4EU supports the idea of a decision tree



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In the industrial setting, process-related controls exist:

- focus on industrial emissions (current and future IED-BREF),
- focus on workers' safety (current and future OSH/ REACH).

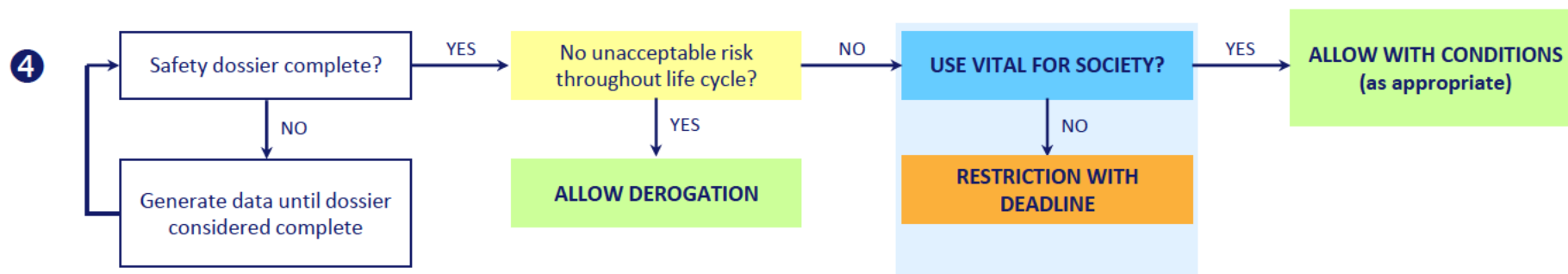
Examples of industrial use (non-exhaustive list) may include:

- intermediates only,
- processing aids,
- PFAS used in equipment (pipes/gaskets/membranes etc.),
- etc.

Such industrial use PFAS are not intended to end up in consumers products/articles.



FPP4EU supports the idea of a decision tree

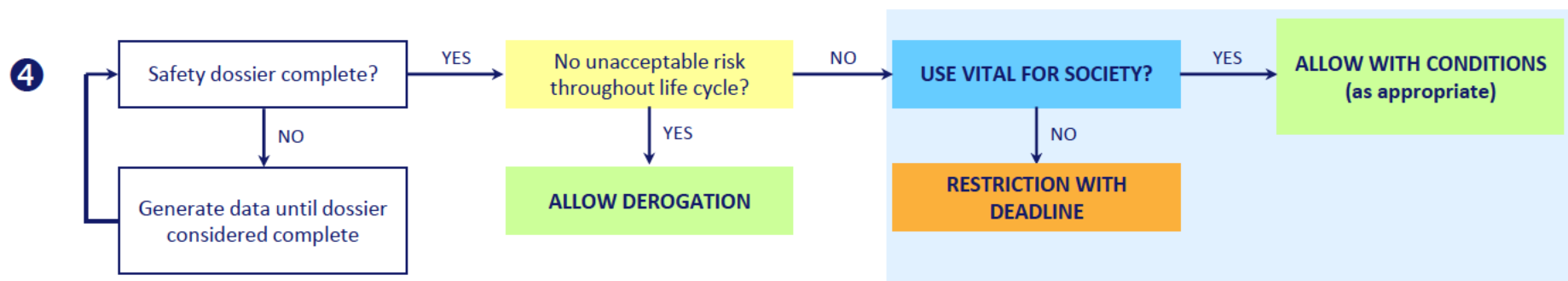


Use 'vital' for society

- Socio-economic value of the substance in its use and the costs of substitution, evaluated ECHA's Committee for Socio-Economic Assessment, well-informed by the downstream user community → no assessment of 'essentiality for society'.
- Over time, the word 'vital' may need to be replaced by the word 'essential' or 'critical'.



FPP4EU supports the idea of a decision tree



Conditions for derogations

- Companies/ downstream users can include assessments of (absence of) alternatives. Potential practical implementation timelines will also need to be considered.
- Societal debates will guide on how to deal, case by case, with (groups of) substances that may pose a health/ environmental risk but remain vital/ essential/ critical for society.

Downstream users play an important role in the process !



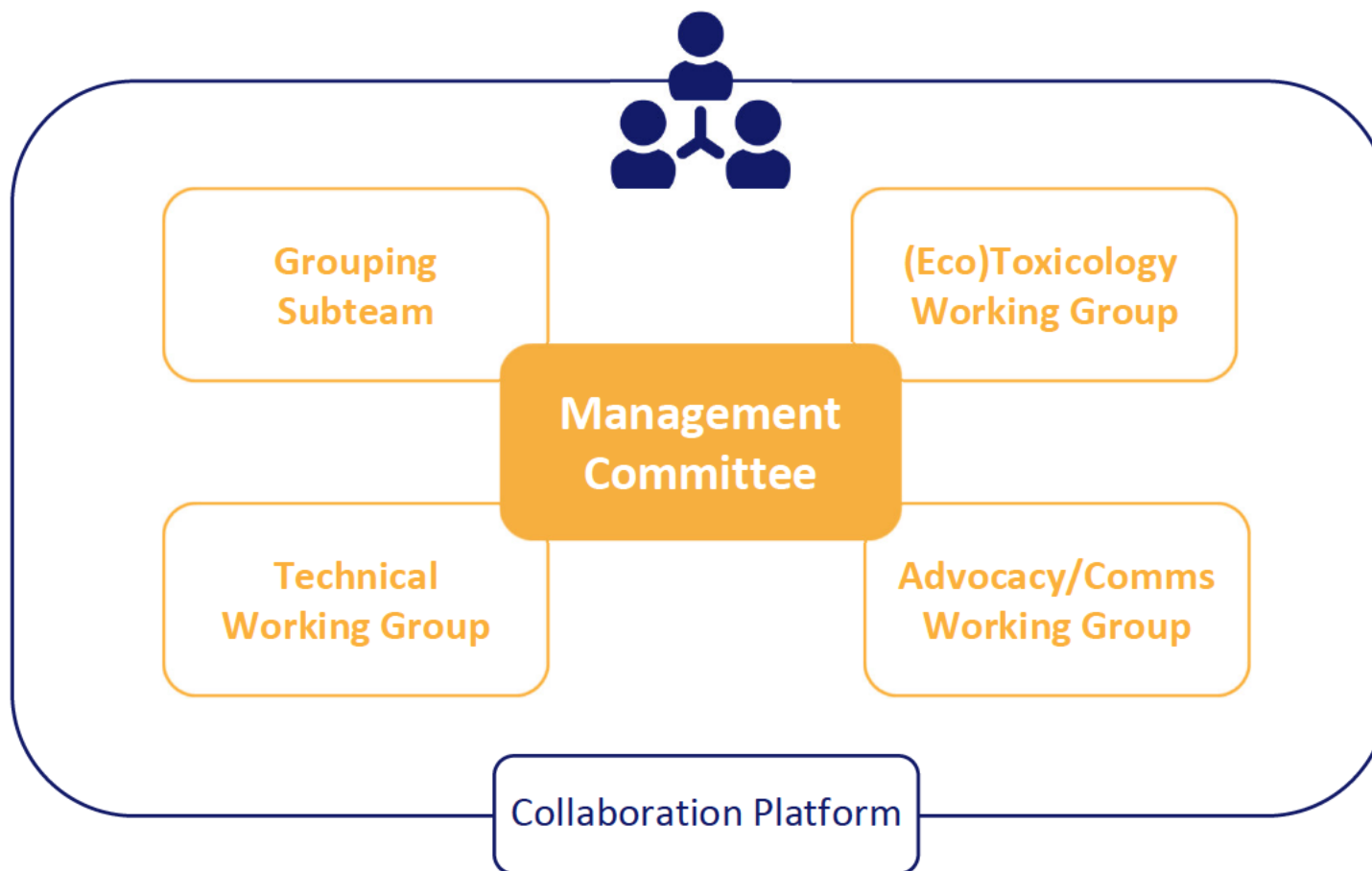
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Coming back to the FPP4EU organisation



Coming back to the FPP4EU organisation



**Large and diverse downstream users' community
(multiple sectors, with diverging experience with
restrictions and speeds)**

Collaboration Platform



That is why FPP4EU looks for intense collaboration



We would like to connect you with our Collaboration Platform



Our Collaboration Platform meeting in December; opportunity to

- Have ± 90 industry stakeholders in one room, in a constructive environment
- Broaden knowledge on value chain
- Answer the same set of questions once (not over and over again)
- Significantly reduce the number of future meetings
- Give downstream users clear advice
- Further increase mutual trust; foster future investment in Europe

Collaboration Platform



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