



About BASA

BASA are a Trade Association set up to act as the voice for the adhesives & sealants sector in the United Kingdom and Ireland. BASA supports its members by representing and promoting the industry, offering guidance on technical and compliance issues, providing networking opportunities for members and providing members with support services. Formed in 1983 from the marriage of two long established associations, the British Adhesives Manufacturers Association and the Sealant Manufacturers Conference, the British Adhesives & Sealants Association is the adhesives and sealants industry's sole voice and primary information source for manufacturers and suppliers. BASA is now Europe's only independent National trade body dedicated solely to the interests of the adhesives and sealants industry and we liaise with Government regarding legislation and keep Members abreast of UK, EU and International proposals and initiatives.

BASA PFAS REACH Restriction Consultation Response – September 2023

Thank you for the opportunity to give feedback on the Restriction on the manufacture, placing on the market and use of PFAS. BASA, The British Adhesive and Sealants Association are concerned about some of the elements of the restriction proposal.

Firstly, we welcome the work of the European Chemicals Agency, and all their hard work in ensuring the safe use of chemicals and agree with the principal of removing PFAS that are hazardous to the environment.

After consulting our members, we are concerned that some products may contain low levels of PFAS or PFAS related substances that are below the threshold where they would be declared on the Safety Data Sheet (SDS). We are not actively adding PFAS when formulating, but we now believe that some of the raw materials used *may* contain some PFAS. This makes it challenging for our members to identify products that contain PFAS, or PFAS related substances. We would therefore like to request a longer transition period for downstream users in the supply chain, particularly where very low levels of PFAS are present in the products placed on the market, as they will need to work with the complex supply chain to identify them and phase them out.

Due to the application of the products in our industry, we believe that PFAS are unlikely to be released into the environment or the levels of release are likely to be in very low level, and we feel that initial priority should be focussed on the larger volume applications, with larger impacts.

As we understand it, the restriction proposal is suggesting that the restriction shall apply 18 months from entry into force, but we feel that this time is unrealistic for our members to identify and formulate PFAS out of our products. We would welcome consideration of a longer time frame or a derogation for products containing very low amounts of PFAS where their use is smaller volumes, to aid this process.

Thank you for taking our comments into consideration.

Submitted on behalf of the Association.

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