

## Questionnaire on PFAS restriction for BCR secretariat

### Do you have remarks on the scope (definition of the PFAS?)

Yes: Fluoropolymers should be excluded from the scope of the restriction.

### Please indicate your sector and describe briefly the Restriction impact/influence on your sector.

ECCA represent the COIL COATING industry (prepainted metal) in Europe. Our major member in Belgium is ArcelorMittal with 4 coil coating lines (500-600 ktons per year, roughly 10% of the European production).

- PVDF/FEVE-coated prepainted metal is used in construction for metal roofing and cladding in particularly harsh environments. Their superior aesthetic and durability guarantee life service > 50 years (not to be confused with commercial warranties that can be lower). The proposed restriction would condemn this niche market imposing much less durable alternatives in severe environments (the alternatives quoted in the restriction proposal are quite fancy and bring no evidence that they meet equivalent stringent requirements as PVDF/FEVE defined in European Standards e.g. EN10169 in terms of outdoor exposure)
- PTFE waxes are used in almost all coatings used by our sector: their substitution would not only represent a quality risk, a loss of functionality in some cases, but above all a gigantic effort of requalification (> 4 years customer homologations studies and further market qualifications), on a case by case basis, involving the 3 levels of our supply chain (paint manufacturers + coil coaters + customers).

### Do you have specific remarks on the restriction text and its exemptions.

We are very concerned about the restriction which does not foresee any exemption whatsoever for coil coating.

The restriction text is biased and reflects little understanding of our manufacturing processes (*e.g. it is very unlikely that PVDF or FEVE coatings or PTFE waxes are released to the environment during the coil coating process. The applied paint is fully cured in the oven to generate the solid coating*), uses and end-of-life of our products.

The timing foreseen is absolutely not reasonable for your sector in view of the huge requalification of our products that would have to take place. Also, the availability of alternatives with sufficient supply capacity on the market remains to be evaluated.