



Les industriels au service
de la performance des matériaux

Courbevoie, 8th September 2023

Dear Sir or Madam,

UITS (Union of Surface Treatment Industries) is the trade organization representing manufacturers working in the field of materials treatment. UITS is a member of the French Federation of mechanical engineering industries, and we fully support the position expressed by the Federation to which we belong. In addition, we would like to make a few clarifications relating specifically to our activity.

PFAS are used in the materials treatment sector for their properties such as lubricating, anti-adhesion and anti-friction, ... It is estimated that 8% of surface treatments are used for their sliding properties. In France, surface treatment represents over 3 billion euros of invoicing. Extrapolating, invoicing volume linked to this activity represents nearly 240 million euros (2 billion at European level).

These coatings are designed according to customer-defined standards and qualifications. Applications are found in a wide range of fields, some of them strategic, such as military and aerospace, automotive, energy, and in sectors such as printing, food industry, ... PFAS-based coatings are often required for safety-critical parts.

Some fluoropolymers are used as fillers in coatings (PTFE, FEP, PFA), and other PFASs can be used in some formulations as surfactants and/or stabilizers. PFASs are also used to protect the health of people working in contact with surface treatment baths containing CMR substances (anti-vapor for hard chrome or plastics etching processes). PFAS in formulations are often present in very small quantities, in concentrations of less than 1%, making them difficult to track. A great deal of R&D work has been carried out on these substances for many years. Our current state of knowledge:

- PFASs used as surfactants and/or stabilizers seem to us to be substitutable today. Nevertheless, it is important to note that there are no effective PFAS-free solutions to protect workers' health (wetting agents in plastic stripping).
- The 3 fluoropolymers (PTFE, FEP and PFA) used for solid/dry film applications are not, for the moment, substitutable.
- Alternatives for lubricants (whether dry or wet) are still at the research stage. None has demonstrated its equivalence in terms of required properties: durability, excessively high coefficients of friction, atmospheric and/or galvanic anticorrosion, electrical insulation, ...

The key issue with PFASs is their accumulation in the environment and the impact on health during both manufacture and use.

Regarding materials treatment, a distinction must be made between the substance production step (which concerns manufacturers) and the coating application step (which concerns surface treatment suppliers). In the case of coatings, good risk management helps to control aqueous and gaseous emissions during the implementation of surface treatment processes.

In view of the crucial stakes for the industry, we therefore ask you to integrate the following points into the restriction drafting phase:

- differentiation of the different types of PFAS and consideration of existing studies on their hazardousness
- consideration of their use (strategic purpose of the field) and the product's life cycle (criticality, release, treatment of end-of-life parts, etc.).
- definition of a substitute and validation throughout the supply chain (equipment manufacturers, contractors, etc.) to ensure that alternatives are no more harmful than the targeted products (presence of CMR substances, waste treatment, or degradation products, etc.).
- the necessity for a sufficiently long transition period (up to 2030, for example) would also be appreciated, in order to gain the necessary hindsight on the alternative solutions currently being developed.

We thank you for your attention to our request. Should you require any further information, please do not hesitate to contact us. Yours sincerely,



Anne-Sophie MAZE
General manager UITS