

Aug 1, 2023

Comment on Proposed Restriction of PFAS

Japan Valve Manufacturers' Association (JVMA)

Japan Valve Manufacturers' Association (JVMA) appreciates the opportunity to provide comments to the PFAS restriction proposal.

1. Introduction

JVMA was established in 1954 and has been a representative association of Japanese valve industry for nearly seventy years. As of today, we are comprised of 115 major domestic valve manufacturers including several Japanese subsidiaries of European valve makers and additional 68 associate companies. Since our establishment, we have implemented various effective programs to contribute to society, occasionally cooperating with some of Central Government Ministries and Agencies. Especially we are pouring the biggest effort to resolve environmental problems, so the Environmental Committee and four working groups in our organization are working on the following issues:

- Greenhouse gas reduction.
- Design for the environment of valves.
- Life cycle assessment of valves.
- Gathering information on restricted substances.
- Environmental education.

To response to the PFAS restriction proposal, we have prepared a technical and socioeconomic statement which is attached document.

2. Comment

There is a tapered thread as a connection method for pipe to pipe and pipe to valves. Many products with tapered threads are already on the market. A PTFE sealing tape is used to seal the tapered thread. A viscous liquid, Bond, has been proposed as an alternative. However, the health safety of these alternatives is yet to be determined. PTFE sealing tape has the potential to tear and flow. However, there are no reports that PTFE sealing tape is harmful. PTFE does not decompose and is harmless to the human body. It will take time for the safety of alternatives to be

guaranteed. We require PTFE sealing tape to comply with the conditions of restriction “until 13.5 years after EiF”.