

WP4 – Draft format structure report summary for 2nd “CfE”

For all points: if info is mentioned... (not always the case)

Goal: check key numbers which will be used by WP7 for SEA (i.e. tonnages, emissions, costs, availability of alternatives). 10-15 pages is the aim.

Uses / Applications (to be listed also in a table preferably)

Main PFAS substances (CAS nr's in Annex)

Tonnage band (per substance group): see also Quick & dirty Excel

Import & Export:

Manufacturing (i.e. # of manufacturing sites) & Market price + market development

Market price & autonomous market development:

No. of production sites:

Emissions (per substance group if possible) resulting from product manufacturing

Where possible report also on attention for past & future trends in emissions

No. of production sites:

Emissions (per substance group if possible) product manufacturing

Where possible also attention for past & future emissions

- Soil
- Water
- Air
- (Waste if possible)

Commented [A1]: You could consider combining this information with the subsequent section as this seems to be on manufacture/use.

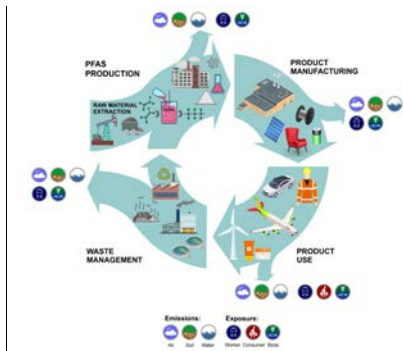
Regarding tonnage band, consider specifying what this tonnage refers to (production, use,...)

Regarding import/export, do you mean import/export tonnages/quantities?

Below you also refer to past and future trends in emissions. Would it make sense to do the same for production/use tonnages, where this info is available?

Commented [A2]: Do you mean the market price of the PFAS substance?

Commented [A3]: Not clear to me what “autonomous” means in this context. Could the word be dropped?



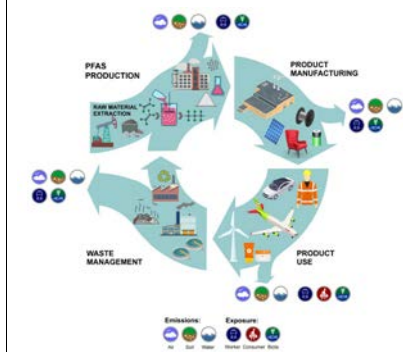
Emissions (per substance group if possible) resulting from product use, including from the waste life-cycle stage

Where possible report also on attention for past & future trends in emissions

Where possible also attention for past & future emissions

Commented [A4]: This is likely to be important

- Soil
- Water
- Air
- (Waste if possible)



Exposure (workers, consumers)

General discussion on emissions and exposure

Summary of existing legal requirements:

Summary of effectiveness of operational conditions and risk management measures:

Commented [A5]: Would it make sense to combine these?

Alternatives

Description of the use of the restricted substances:

Functional properties:

Technical properties:

Risk profile (human health and environment):

Availability:

Cost:

Substitution

Technical

Market price:

Overall conclusion on the suitability of the alternative and expected time for the transition (if the alternative is considered likely suitable)

Commented [A6]: Wouldn't the use of the PFAS substance be already captured in the first section above?

What appears to be missing is the name of the alternative and the PFAS substance(s) the alternative would replace.

Maybe better to talk about "PFAS substances" instead of "restricted substances" as you are currently only working on preparing a restriction proposal.

Commented [A7]: Of the PFAS substance to be replaced, of the alternative, or both?

Commented [A8]: What is meant here?

Commented [A9]: "To achieve a similar functionality as using PFAS" (can be that you need to use larger amounts of the alternatives than the PFAS)

i.e.

Subuse	Non PFAS alternative?	Function	Advantage / disadvantage	Cost

Commented [A10]: It is not clear to me how this table relates to the box on alternatives above.

Commented [A12]: Do you mean the function that the PFAS substance fulfils and that needs to be replaced by an alternative?

Commented [A14]: Do you mean costs of the alternative?

Commented [A11]: Would you expect here "Yes" or "No" as response or the name of the alternative?

Commented [A13]: Do you mean technical advantages/disadvantages? Of the PFAS substance or the alternative?

Economic impacts in case of a full PFAS ban

Economic impacts:

Other impacts in case of a full PFAS ban:

Environmental & social

Commented [A15]: Do you mean to capture here only the costs (i.e. negative impacts) or also the benefits (i.e. positive impacts) of a ban?

Methods used & uncertainties

Impacts of a ban might look very different under different conditions, e.g. different transition periods or limit values above which the ban would apply. If you have any such information, it might also be useful to report on this.

SUMMARISING TABLES in Annexes

GENERAL: See also the Excel sheet "Quick & dirty".

SUBUSE X	tick box	PFAS specification	tonnage (tonnes PFAS)	indicative trend	emission (tonnes PFAS)	non PFAS alternative available
Polymer	yes/no			--/-/0/+ / ++		yes/no
Side-chain polymer	yes/no			--/-/0/+ / ++		yes/no
Ionic PFAS	yes/no			--/-/0/+ / ++		yes/no
TFA	yes/no			--/-/0/+ / ++		yes/no
CF3-R	yes/no			--/-/0/+ / ++		yes/no

CAS nr's PFAS substances:

PFAS	CAS nr

PFAS alternatives

PFAS alternative	Functionality	Readily available?	Transitional period required? (in years)