



EUROPEAN COMMISSION

DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP AND SMES

Consumer, Environmental and Health Technologies
REACH

Brussels,

GROW.D.1 [REDACTED]

MEETING WITH THE 3M COMPANY ON PFAS RESTRICTIONS

29 MAY 2019 (17:00-18:30)

Participants:

3M : [REDACTED]

DG GROW : [REDACTED]

3M is interested in developing a standard analytical method for quantifying the C9-C14 PFCAs in articles, fluoropolymers and –elastomers that can measure levels of 25 ppb of the sum of the C9-C14 PFCAs due to a foreseen restriction, currently drafted by the Commission. 3M said there is a need of a (standardised) reference method as part of the proposed Commission restrictions.

Furthermore, an accepted and possibly standardised method for the companies that sell fluoropolymer products to downstream users is important for business to business transaction. 3M explained that downstream users are asking for a valid certification of the compliance of the product with REACH. 3M is working on an analytical method. However, the current method for analysing fluoropolymer matrices for C9-C14 PFCAs results in large variances between laboratories. 3M is therefore interested in developing a validated method preferably through a third party and in establishing it as a standardised method (e.g. through CEN). This would help to increase trust in the method. In addition, since there are various competing producers, a third party could overcome the issues related to confidential information on substance identity or production methods. A third party could accelerate a generally accepted method to be established. 3M has been in touch with the FORUM in ECHA, trying to establish collaborations with Member State laboratories for measuring the levels of 25ppb of C9-C14PFCAs (e.g. State Laboratory in Veneto).

Another main issue for the company is to be assured that the coming restriction will include the derogation, for the production of three specific fluoropolymer products, recommended with the opinion of RAC and SEAC. The main reason is that they have already invest millions to improve the production process in order to achieve the minimization of impurities of C9-C14 PFCAs in addition to the costs burdened with the development of an analytical method.

COM mentioned that it tasked in the past the Dutch Institute for Standardisation (NEN) with the development of an analytical method for PFOA in different articles. The method was published as a Technical Specification, but it is not a standardised method since a validation study was not funded (responsible DG was DG ENV). COM said that it does not see an option to fund the development of a standardised method for C9-C14 PFCAs. However, COM can provide contacts to NEN and CEN.

On the issue of the potential derogation, COM replied that RAC and SEAC recommended it its opinion to include such a derogation in the restriction entry. COM is currently drafting the restriction, which will then be submitted to the REACH Committee. COM pointed out that it is likely that other derogations will re-evaluated due to a decision on PFOA in the COP of the Stockholm Convention.

Commission will in addition provide some names to 3M for contacting CEN and NEN.

[REDACTED]