

**From:** [REDACTED]  
**To:** [REDACTED]@ec.europa;  
**Subject:** EU PFAS Action Plan  
**Date:** 27 March 2020 09:36:46  
**Attachments:** [image003.jpg](#)

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Dear [REDACTED]

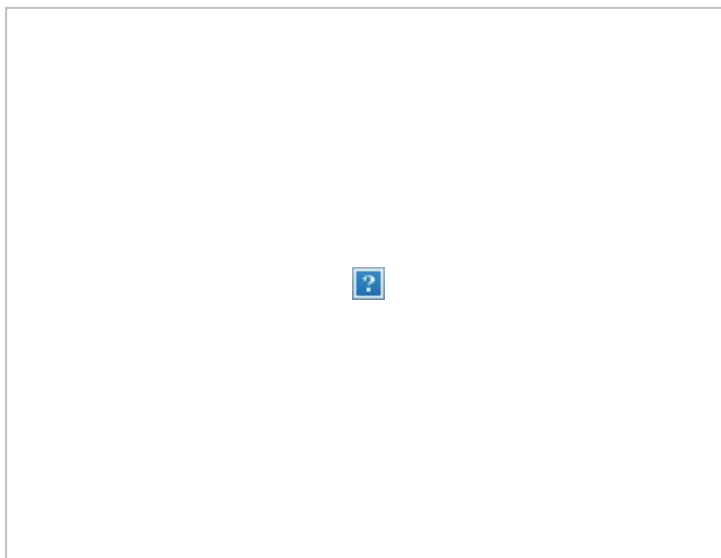
Dear [REDACTED]

I hope this finds you all well and in good health.

I am part of the SEMI PFAS Working Group where we discuss relevant regulatory issues with member companies across the semiconductor manufacturing supply chain. We understand that the Commission is considering a PFAS action plan targeting non-essential uses of PFAS (either a stand-alone action plan or part of the Chemical Strategy for Sustainability) to be released in Summer 2020.

We have discussed this topic with our PFAS WG member companies, and we are willing to draft a position paper. Before doing so, we have couple of questions which might help each other to understand the background:

- Does the Commission consider fluoropolymers also within the scope of PFAS action plan? Fluoropolymer PFASs are essential for facilities and equipment used for semiconductor manufacturing. Non-polymer fluoromaterials might not be so essential for the functionality of finished semiconductor articles (devices), but they remain essential for their manufacture in high quality and yield.
- We would like to know if the Commission would consider the distinction between Non-polymer and Polymer PFASs made in the following OECD PFAS 'definition' graphic: (from OECD "Synthesis Paper on Per and Polyfluorinated Chemicals (PFCs)", Figure 1; ref <https://www.oecd.org/chemicalsafety/risk-management/synthesis-paper-on-per-and-polyfluorinated-chemicals.htm>). We believe that the distinction the OECD is drawing between polymer and non-polymer PFASs is a critical one that we recommend to the Commission to consider.



- It would be also useful to know if there is any clarity on the meaning of 'use'. For example, generally speaking we do not think any non-polymer PFAS is 'used' per say in articles, it is just a residue left from fluoropolymer manufacturing. In contrast, some non-polymer PFASs are indeed 'used' in the manufacture of some process chemicals.

Hoping to get your feedback on our questions. We would be also delighted to have a call with you and your team to exchange ideas. I will be glad to bring in a few members of SEMI PFAS WG

in the call.

Please feel free to forward my email to your colleagues who are involved in this matter.

Wishing you safe and healthy days ahead.

Best Regards,



 Advocacy and Public Policy

SEMI Europe Brussels Office

Rue de la Science 14, 1040

EU Transparency Register: 402302029423-14

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