

EURATEX contribution to the ECHA public consultation

May 2020



Initial comments on proposed restriction for PFHxA, its salts and related substances

EURATEX, the European Apparel and Textile Industry Confederation, wishes to convey its first comments on the proposed restriction for PFHxA, its salts and related substances.

- **Importance of fluorinated substances in specialised textile applications**

The European textile and apparel industry represents 171.000 companies with diverse manufacturing - clothing, home textiles and specialised applications that are pivotal for their performance and safety such as technical and medical textiles and personal protective equipment (PPE). Technical, medical and PPE applications require fluorinated substance finishing as these are critical/essential uses that need to fulfil the highest degree of safety and performance standards imposed by public or private customers (e.g. EU legislation, EU/national standards, ISO standards, Technical Performance Profile, EU industrial standards (VDI-, IMO-, BDLI-, ESA-), company standards and other global legislation and standards).

Shorter chain fluorinated chemistry and non-fluorinated alternatives cannot fulfil these requirements, according to research evidence, which will be provided at a later stage.

C6 chemistry is currently the only technically feasible and available alternative to already restricted C8 that can deliver *water, oil, dirt and chemical repellence* even though there are certain limitations compared to C8. Additional property of *resistance to viruses and bacteria* make the chemistry essential for medical textiles.

We also wish to emphasise that these specialised textiles are not mass-produced and that the finishing is performed at highest standards at European facilities.

- **Need to exclude critical uses from the restriction scope**

EURATEX with its Members actively contributed with technical evidence to support the policy making process during the PFOA restriction which resulted in a proposal reflecting several needs expressed by the textile sector. We appreciate the role played by the policy-makers in this complex exercises.

Once these exemptions cease to exist, C6 remains as the only alternative to ensure the required safety and performance of critical textiles as well as the competitiveness and autonomy of the European industry.

As initial input on the proposed restriction, we wish to stress that the following critical uses shall also be granted a derogation:

- **Cat.III; (I) bullet wounds or knife stabs (Regulation 2016/425)**
- **woven reusable medical textiles (exemption for all medical textiles)**
- **outdoor technical textiles (e.g. awnings, outdoor upholstery)**
- **technical textiles (e.g. automotive, construction)**
- **their reimpregnation**

The list is non-exhaustive and detailed technical arguments and standards on the abovementioned and other uses shall be provided at a later stage during the public consultation.

- **Longer transitional period**

The currently proposed transitional period of 18 months for non-exempted articles is not enough for companies to switch from C6 to non-fluorinated alternative. Company evidence suggest that switching from C8 to C6 took 5 years. We propose a minimum transitional period of 36 months for the PFHxA restriction to allow industry to find and apply non-fluorinated alternatives that will provide the same performance as the fluorinated ones.

- **Importance of autonomy and competitiveness of the EU industry**

The aim of the REACH regulation is to ensure “a high level of protection of human health and the environment...while enhancing competitiveness and innovation”. The future EU Chemicals Strategy for Sustainability¹ also echoes these principles adding an additional factor of “strategic autonomy”. The latter has been exposed during the COVID-19 outbreak and EU’s dependency on imported critical medical and protective equipment and chemicals.

Now is the time that the EU recognises the strategic importance of the European textile sector and maintains its manufacture of essential products dependent on C6 chemistry.

¹ European Commission Roadmap Ref. Ares(2020)2460806 - 09/05/2020