



Opinion Paper of Industrial Laundry Technology and Textile Finishing Technology on PFAS restriction dossier for ECHA's consultation 2023

Restriction Dossier of PFAS:

In the proposed restriction dossier, there are proposed two different regulatory options. Either, a complete ban on all PFASs without exemptions, or a ban with application-specific exemptions, which seems to be prioritised. All applications not considered without exemptions would be affected by a direct ban of all PFASs after a transition period of 18 months (approx. 2026 / 2027).

The industry of Industrial Laundry Technology and Textile Finishing Technology would nevertheless be affected by a PFAS ban or regulation either in their products or in the production in a very wide variance.

Both options are decidedly too ambitious and pose a great concern to the future survival of this industry.

VDMA Members' concern in the Industrial Laundry Technology and Textile Finishing Technology sector:

This sector, represented by VDMA Association Textile Care, Fabric and Leather Technology includes machinery and equipment for industrial laundry and textile finishing (ironing, form finishing, fusing and packaging) for textile products such as

- Fashion wear and apparel, workwear, protective clothing, hospitality and medical linen, sheets, towels, leather products (e.g. gloves, car seats, hat shelves), textile and leather parts for interior design

These machines and systems are used in the following areas:

- Textile care companies, textile rental services, laundries, the hospitality sector(e.g. hotels or hospitals), garment and accessoires manufacturers, automotive production and interior manufacturing

This very broad variance not only concerns the products or production, but also the manifold application variants (application of technologies). The manufacturers of these machines and

systems are NOT manufacturers of products with PFAS, but users of components that contain PFAS due to their specific requirements of application and use.

It must be emphasised that for the manufacture of these complex and demanding technology products, each company must sometimes use up to several thousand suppliers. This is made more difficult by the fact that it is hardly possible or impossible to obtain information from many suppliers about PFAS in the components supplied. For some of the components requested with the suppliers, it has already been recognized that there is no PFAS alternative, for others the situation is unclear (no declaration obligation or no response on request) or the alternatives are unusable, due to quality or costs.

However, intensive research by manufacturers with their suppliers has shown that the following components contain PFASs due to their specific use and therefore have been identified as products for

CRITICAL USE CASES, THAT CALL FOR DEROGATION! :

- Lubricants, e.g. bearing greases for high-temperature resistant applications in the washing and drying process
- Machine parts (TEFLON) as mechanical guide, bracket, bearing, roller, screw nut, thermal insulator etc. for low friction and temperature resistance (COPPER PARTS HAVE WORSE COEFFICIENT OF FRICTION AND IS UNDESIRE THERMAL CONDUCTOR)
- Axial sealing to rotating shafts (VITON) for tightness, temperature and chemical resistance in the washing process (NO PFAS ALTERNATIVE AVAILABLE)
- V-rings, static gaskets and hoses (VITON, TEFLON) for temperature and chemical resistance in the washing process (NO PFAS ALTERNATIVE AVAILABLE)
- Coating for sheetmetal parts (TEFLON) (eg. slices or strips) for low friction and and temperature resistance (CERAMIC COVERING VERY EXPENSIVE AND SERIOUS QUALITY LACK DUE TO BRITTLENESS) in the washing and drying process
- Antipplash film (TEFLON) for water repellent protection during washing process (POLYURETHAN MAYBE ALTERNATIVE, BUT HAS TO BE EXAMINED)
- Flame retardant protection for injection process of plastic and elastomeres, plastic and elastomeres themsleves, electric and electronic components
- Seals (PTFE, FKM, FFKM, FPM, VITON and fluorpolymeres as base materials) for protection against higher temperatures, abrasion, friction, elasticity but hightness during the washing and drying process (NO EMMISSON DURING USE IDENTIFIABLE, NO ALTERNATIVES IDENTIFIED)

- Coatings (PFA, FEP, PTFE, VITON, TEFLON) for resistance to chemical influences as corrosion protection, high diffusion resistance during, protection against high temperature and chemicals during the washing process (e.g. in the washing drum cage or ram plate of dewatering press) (NO EMISSION IDENTIFIABLE DURING USE, NO ALTERNATIVES IDENTIFIED)
- Coatings (PFA) for non-stick properties and higher chemical resistance during washing, transportation and drying process with high temperature as required for highly contaminated textiles (e.g. medical textiles) (NO EMISSION DURING USE IDENTIFIABLE, NO ALTERNATIVE IDENTIFIED)
- Coating (PTFE) for materials such as slices or strips that are required where a maximum of friction reduction is required during washing and drying process (prevention of wear and tear and long as possible lifetime) (NO EMISSION IDENTIFIABLE DURING USE, NO ALTERNATIVE IDENTIFIED)
- Pneumatic system products (PFBS) for stain resistance to enhance lifetime of product and spare parts of washing and drying process (NO EMISSIONS DURING USE IDENTIFIABLE - NO ALTERNATIVES IDENTIFIED)
- Hydraulic system products (PTFE, FKM, FFKM, FPM) for enhanced resistance during washing and drying process (NO ALTERNATIVES IDENTIFIED)
- Flex-and vacuum hoses (PTFE, TEFLON) of various devices for textile finishing for design related equal temperature resistance for pneumatic compressed air line and vacuum extraction of hot steam
- Conveyor and masking tapes for (PTFE, PFA) temperature resistance for adhesive residue-free bonding textile surfaces or leather
- Temperature protection in fusing and laminating machines, like flags (TEFLON) for sliding and scraper blades (PTFE) for dimensionally stable bonding textile surfaces or leather
- Hem rails (PTFE) for adhesive-free, heat and steam-resistant folding and ironing jacket hems
- Frame soles (PTFE) for material – protective (heat and friction) hand ironing devices

This list is based on the information available and is not exhaustive.

The companies came to the knowledge, that the use of currently available substitutes cannot be clarified in most cases. In very few applications where substitutes allegedly exist, they either

do not meet the required quality standards or are simply too expensive, so that a PFAS ban would have drastic consequences:

- Risk of end of production and use of efficient high technology due to lack of economic efficiency or technological obstruction
- A drastic reduction in the lifespan of products
- Significant higher costs of maintenance due to corrosion, spare parts with lower quality and and higher price etc.
- Significant increase of industrial waste, due to a shortened lifespan of products, components and spare parts
- Shortening the life of the textile goods to be treated less gentle and thus more textile waste
- Risk of loss of international competitiveness of European manufacturers in a global market environment
- Risk of relocation of manufacturing and application due to countries with lower requirements
- Risk of competitive distortion with strong competitive pressure from Asia
- General risk of importing unverified machines from non-EU countries
- Significant weakening of the European technology leadership up to its destruction with corresponding socio-economic effects (loss of tax revenue, unemployment)

Conclusion:

Risk assessment and classification system

The lack of classification of PFAS in the regulation means no information obligation from the suppliers, which makes an analysis time-consuming, very difficult and anti-economic. First, there should be an obligation and a feasible system to obtain such information along the supply chain.

Not all PFAS entail the same risk. Some PFAS groups are mobile and get into the environment, others are stable. Exceptions must apply where there is no entry into the environment. The manufacturers of Industrial Washing Technology and Textile Finishing Technology call for the consideration of different exposure scenarios under scientific conditions.

Technology

PFAS are needed in the field of textile care and finishing in machines and systems, as specific general conditions (high temperatures, high frictional resistance, aggressive chemical conditions or a combination of these) prevail. According to the current state of knowledge, there are no alternatives for most of the applications in this area, that have technological maturity and fulfill safety, energy consumption, longevity, economically or holistic relevant aspects.

Feasible handling of exposition risks

In the future, due to the lack of standardised analytical methods, there is a risk that products or components containing PFASs, which are no longer produced in the EU, may continue to find their way into the EU. There is an urgent need for exemptions for Industrial Laundry Technology and Textile Finishing Technology in the mentioned products, components and spare parts. Apart from a strict ban, alternative solutions should be discussed. For example, closed cycle options should be discussed for possible solution. Industrial actors should also be given the opportunity to check the creation of conditions that PFAS are handled professionally, to avoid entry into the environment. In the past there are many examples that the industry successfully did so (e.g. CFC in closed circuit of textile cleaning).

Longer Transition Period is urgently required

The development of valid and serious alternatives as well as their safe application requires time and resources of many years, maybe even decades. A transition period of 18 months is far too short and unrealistic for the entire industry and its applications. The meaningful market of spare parts for the purpose of sustainability and economy cannot be done with this transitional period. There are generally no short-term substitutes that fulfill the requested quality standards and it can force the machine producers to change their machine construction concept with undesired consequences. There is also the risk to force the replacement of machines that would still be operational for many years. Economic efficiency, resource conservation and sustainability would be impeded here. There should be an unlimited or a much longer transitional period that corresponds to the life cycle of the machines and systems currently used for a sustainable approach.

Socio economic impact and international competitiveness

The manufacturers of Industrial Laundry Machines and Textile Finishing Technology are aware of their responsibility and fundamentally support the goal of no longer allowing dangerous PFAS to get into the environment.

However, in our opinion this goal should also be achieved, taking very much into account the technical, economical and organisational feasibility for small and medium-sized companies, as well as socio-economic impacts and international competitiveness.

Here the companies see themselves as very challenged and very worried about being able to survive with their products on the market in the future.

Date: 14th August 2023

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