

Aug 25, 2023

Comment on Proposed Restriction of PFAS

Japan Valve Manufacturers' Association (JVMA)

Japan Valve Manufacturers Association (JVMA) appreciates the opportunity to provide comments to the PFAS restriction proposal.

1. Introduction

JVMA was established in 1954 and has been a representative association of Japanese valve industry for nearly seventy years. As of today, we are comprised of 115 major domestic valve manufacturers including several Japanese subsidiaries of European valve makers and additional 68 associate companies. Since our establishment, we have implemented various effective programs to contribute to society, occasionally cooperating with some of Central Government Ministries and Agencies. Especially we are pouring the biggest effort to resolve environmental problems, so the Environmental Committee and four working groups in our organization are working on the following issues:

- Greenhouse gas reduction.
- Design for the environment of valves.
- Life cycle assessment of valves.
- Gathering information on restricted substances.
- Environmental education.

To response to the PFAS restriction proposal, we have prepared a technical and socioeconomic statement which is attached document.

2. Comment

It is intractable as a technical function provided by PFA. PFA has the same resistance to decomposition as PTFE, and can be injection molded. Persistence is required for valves in the following categories.

- Valve films used as valve seat insert protectors for check valves in the semiconductor manufacturing category.
- Valve seats for valves used for high-purity gas supply, high-purity chemical supply, and waste liquid in the semiconductor manufacturing category.

- Valve boxes for valves used for high-purity gas supply, high-purity chemical supply, and waste liquid in the semiconductor manufacturing category.
- Valve diaphragms used for high-purity gas supply, high-purity chemical supply, and waste liquid in the semiconductor manufacturing category.
- Valve linings and coatings used for manufacturing, transporting, and storing various high-purity chemicals in the semiconductor and electronics categories.
- Valve lining and coating used for supply of various high-purity chemicals in the semiconductor and electronics categories, and for waste liquid equipment.
- Valve linings and coatings used in semiconductor-grade pure water supply equipment in the semiconductor and electronics categories.
- Valve linings and coatings used in chemical supply lines for manufacturing secondary batteries in the semiconductor and electronics categories.
- Valve linings and coatings used in chemical lines for neutralization equipment, wastewater treatment equipment, and electrolytic treatment equipment in the power generation water treatment category.
- Valve linings and coatings used in chemical liquid lines for industrial water and wastewater treatment equipment for iron and steel industry category.
- Valve linings and coatings used in plating liquids and pickling lines in the steel industry category.
- Neutralization equipment in the water and sewage treatment category, linings and coatings for valves used in chemical lines for filtration equipment.
- Valve linings and coatings used in chemical lines for pure water equipment and wastewater treatment equipment in the industrial water treatment category.
- Valve linings and coatings used in chemical lines for pretreatment processes in the seawater

desalination equipment category.

- Valve linings used in pharmaceutical and food circulation lines in the chemical industry category.

- Valve linings and coatings used in lines for various acidic/alkaline process liquids in the chemical industry category.

- Valve linings and coatings used in chemical lines of electrolysis equipment in the chemical industry category.

- Valve linings and coatings used in chemical filling lines for chemicals in the chemical industry category.

- Valve linings and coatings used in manufacturing facilities for intermediates and active pharmaceutical ingredients in the pharmaceutical manufacturing category.

- Valve lining and coating used for transfer of various process liquids in multi-plants in the pharmaceutical manufacturing category.

- Valve linings and coatings used in fluid transfer for sterilization and drainage processes in the pharmaceutical manufacturing category.

- Seat rings and linings of valves used for fluid control of building air-conditioning water supply/hot water supply/petrochemical and chemical air conditioning equipment, water supply/hot water supply control of building facilities, water supply control of buried piping, and fluid control of petrochemical plants and chemical plants.

- Lining of valves used for sealing against corrosive fluids in the food manufacturing category and preventing water leakage.

- Valve linings and coatings used in chemical lines for additives, neutralization, and saccharification processes in the food manufacturing category.

- Valve linings and coatings used to transfer fluids for sterilization and drainage processes in the food manufacturing category.

- Diaphragms of valves used in safety valve parts for liquefied gas storage tanks in the energy industry category

PFA is the only polymer that can be injection molded with high persistence. We may be able to develop alternatives, but we cannot prepare everything in a short period of time. For that reason, we require valves to comply with the conditions of restriction “until 13.5 years after EiF”. It is desirable that the conditions of restriction corresponding to the multiple Uses described in this comment be clarified in the opinion of SEAC.