

The United Electronics Coating Association (UECA) represents the leading companies providing protective coatings for the electronics industry that are used throughout the world economies. One of UECA's key objectives is to support the electronics industry to deliver a sustainable future, enabling electronics re-cycling and reparability, significantly reducing e-waste, eliminating environmentally hazardous materials and facilitating the circular economy.

The UECA supports the planned elimination of the use of PFAS in electronics coating materials, which is consistent with the objectives of the association and industry in delivering a sustainable electronics future.

As part of the UECA membership's drive towards a sustainable future, all member companies have already developed and supply PFAS free electronic coating solutions, with growing market demand for such products.

However, PFAS chemicals are still used in some coating applications where alternative chemistries do not currently exist. It is important to note that as an industry, utilisation of PFAS chemicals is extremely small. It is also important to note that the use of PFAS chemicals in electronic coatings is also very small in comparison to their use in other segments of the electronics industry, such as semi-conductor production and indeed minimal compared to other unrelated industries.

Whilst UECA supports and is working towards the elimination of PFAS chemicals in all electronic coatings, for those applications where PFAS is used, a transition period of 18 months from the new regulations coming into force is too short for all markets around the world. Electronic coatings are used in numerous industries including: defence, aerospace, medical, automotive and consumer electronics, with both product development and test & validation cycles that take many months if not years to complete and ready for market. Consequently, there will need to be sufficient time for both the UECA members and their customers to develop, validate and implement non PFAS coating solutions that provide the same level of protection as currently available for all the industry customers. It is also already evident that for some applications, PFAS free coatings will not reach the same or required level of performance, creating additional challenges across the industry.

Based on these facts the UECA believes that for the majority of applications, no further derogation beyond the 18 months transition period is needed. However, for some specialist and vital industries, it will be a major challenge to comply within these timescales, as highlighted in detail in the ORGALIM response and therefore for these the 5-year derogation will be needed. UECA members will identify which industry customer sectors will need this derogation in order to develop a more sector-based approach via the association.