

PFAS PUBLIC CONSULTATION: OVERVIEW BRIEFS SUBMITTED BY EUPC

Brussels, 25 September 2023

EuPC is the leading EU-level Trade Association, based in Brussels, representing European Plastics Converters. EuPC now totals about 51 European Plastics Converting national and European industry associations, it represents close to 50,000 companies, producing over 50 million tonnes of plastic products every year. The European plastics industry makes a significant contribution to the welfare in Europe by enabling innovation, creating quality of life to citizens and facilitating resource efficiency and climate protection. More than 1.6 million people are working in about 50,000 companies (mainly small and medium-sized companies in the converting sector) to create a turnover in excess of 280 billion € per year.

Introduction and general comment

Following our initial submission, EuPC comments on specific applications. Since those are very diverse, each application is covered in a separate submission. This document gives an overview on the submitted briefs.

Fluoropolymers should be excluded from the scope of the restriction

Based on the non-toxic properties described in the briefs, fluoropolymers should in our view be excluded from the scope of this restriction. We however provide additional information showing both its negligible emission and the disproportionate socio-economic impact that would be linked to its substitution.

Derogation for uses solely in industrial settings

Substances used solely in industrial settings should be derogated with appropriate risk management measures at manufacturing plant level if appropriate.

Inclusion of a review clause

In case fluoropolymers would not be derogated, the adequate transition periods should be granted.

In addition to that, the restriction should include a review clause and process whereby it may be evaluated whether or not the alternatives could be successfully placed on the market potentially allowing if needed extension of those transition periods.

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Summary of submitted briefs of all sectors

SECTOR & REFERENCE TO SUBMISSION	APPLICATIONS	PFAS USED	SOCIO-ECONOMIC IMPACT	REQUESTED TRANSITION PERIOD
FOOD CONTACT MATERIALS AND PACKAGING	Additives for thin PP and PE films	PVDF HFP; HFP/VDF/TFE Polymer; PTFE; PE-TFE	Up to 2,75 million T film impacted: 150 bn € Substitution costs: 1 bn €	6.5 years after Entry into Force for virgin material Articles containing recycle: Subsequent gradual reduction of FP content in film for a period of +6 years (therefore 6.5 + 6 years = 12.5 years)
	Waxes, greases and sprays; Printing inks	PTFE; 3,3,4,4,5,5,6,6,7,7,8,8,8-Tridecafluorooctane-1-sulphonic acid; Poly[trifluoropropyl(methyl)siloxane]		6.5 years after Entry into Force
	Grease-proof paper	Perfluoroalkylethyl acrylate(mixture); Diphosphoric acid, polymers with ethoxylated reduced methyl esters of reduced polymerized oxidized tetrafluoroethylene; 2-Propenoic acid, 2-methyl-, polymer with 2-hydroxyethyl 2-methyl-2-propenoate, α -(1-oxo-2-propen-1-yl)- ω -hydroxypoly(oxy-1,2-ethanediyl) and 3,3,4,4,5,5,6,6,7,7,8,8,8-tridecafluorooctyl 2-propenoate, sodium salt Potential presence of short chain and C6 based PFAs		

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FOOD CONTACT MATERIALS AND PACKAGING	Caps and closure for heat and chemical resistant packaging	PFTE; FKM; EFTE; PVDF; PFA		12 years after Entry into Force
AUTOMOTIVE & TRANSPORT	Plastic fuel systems (i.a. seals, joints, gaskets)	FKM; FVMQ; ETFE; PTFE; FEP; THV	1 bn € All gasoline powered fuel systems in EU concerned	13.5 years after Entry into Force
MEDICAL DEVICES, VETERINARY MEDICINE, RESEARCH AND LIFE SCIENCE	Medical devices: Drug Powder Inhalers, Pen Injectors, Process fluid connectors	PTFE; PFPE; FEP		13.5 years after Entry into Force
	PCTA Catheters	PTFE, FEP		20 years
	Research & Life science: Labware (i.a. Spatulas, Fittings, Containers, Parts of HPLC system)	PTFE; PFA		13.5 years after Entry into Force
	PE/EVOH/PE films for pharmaceutical and veterinary applications	HFP; VDF		13.5 years after Entry into Force
MEDICAL PACKAGING	Pharmaceutical blister packaging	PCTFE	Requalification costs: 2 bn €	13.5 years after Entry into Force

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PLASTIC SHAPES FOR MACHINING	Engineering polymer shapes for machining: automotive/chemical industries/food contact/packaging/medical/electronica and semiconductors/parts in machines	PTFE, PVDF, PFA	R&D costs: 15 Mio. € for whole sector	13.5 years after Entry into Force
	Lubricant or coatings of tooling systems	PTFE		13.5 years after Entry into Force
PLASTIC COMPOUNDS AND MASTERBATCHES	High performance thermoplastic compounds for injection moulding articles of small dimensions	PTFE		Minimum 10 years
	Non-dripping agent in combination with flame retardants	PTFE		3 years
	Additive for polyolefin film extrusion	PVDFHFP; HFP/VDF/TFE Polymer	<i>Please refer to submission on FCM & Packaging</i>	
OTHER SECTORS	Plastic pipe systems and fittings	PTFE; FKM; FFKM; PVDF; ECTFE		Time-unlimited derogation

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OTHER SECTORS	Lamination foils for window profiles and façades	PVDF		
	Artificial leather upholstery	PVDF		
	Semiconductors manufacture	PVDF, PTFE		