

Regulation (EC) No. 1907/2006 (REACH)
Proposal for a restriction of Per- and polyfluoroalkyl substances (PFASs)
submitted by

BAuA - Federal Institute for Occupational Safety and Health
Bureau REACH, National Institute for Public Health and the Environment (RIVM)
Swedish Chemicals Agency (KEMI)
Norwegian Environment Agency
The Danish Environmental Protection Agency
Date: 07.02.2023

22.03.2023

Dear Sir or Madam,

Schreiner Group GmbH & Co. KG, Bruckmannring 22, 85764 Oberschleißheim appreciates the opportunity to participate in the public consultation on the proposal for a restriction of the substance Per- and polyfluoroalkyl substances (PFASs).

We understand that an online information session will be organised on 5 April 2023 to explain the restriction process and to help those interested in participating in the consultation. Against this background, we will submit a more detailed statement in the follow-up to this event and in consideration of the further indications in order to address specific details of the proposal and to underline the special interest of our company. This notwithstanding, we submit the following observations in advance as a first indication and without limiting or determining our further submissions.

Schreiner Group is an internationally active German family-owned company and regarded as a preferred partner in the Healthcare and Mobility markets. Its core business is focused on top-quality functional labels enhanced by complementary system solutions and services. Schreiner Group's innovative high-tech labels and functional parts create new dimensions for smart solutions and help make life healthier and safer, and enhance human mobility.

A. Observations and comments

- (1) First, we would like to express our appreciation for the derogation regarding textiles for the use in filtration and separation media used in high performance air and liquid applications in industrial or professional settings that require a combination of water- and oil repellence granted in section 5e of the proposal.
- (2) However, we consider that a temporary derogation, as provided for in the proposal, is inappropriate in view of the specific circumstances and that there should be a

Seite - 1 -

general derogation, or at least a temporary derogation of a longer duration. In short, this necessity arises for the following reasons.

- (3) The Proposal justifies the derogation of only 6.5 years with the fact that stakeholder information and the Annex XV dossier for PFHxA point to a high substitution potential for high performance membranes (see proposal p. 116). However, the justification for the substitution potential (Annex E, pages 18 - 43) is not convincing.
- (4) In particular, only one example is given for alternative products already on the market, namely polyurethane membranes. No alternatives are stated for oleophobic coatings, especially for C6-containing coatings. Such alternatives do not exist either.
- (5) The justification for the substitution potential, however, fails to take into account that for high performance membranes, especially for automotive applications, an oil repellency of at least grade 6 is required in order to make membranes repellent to liquids such as brake fluid or super gasoline. It is a chemical and physical fact that an oil repellency of at least grade 6 (according to AATCC 118) can only be achieved by a C6- or C8-containing coating of the membrane, for which currently no fluorine-free alternatives are available. This is also not to be expected in the future.
- (6) This essentially follows from the consideration that a solid surface must have at least CF3 groups in order to repel liquids with very low surface tension, such as brake fluid or super gasoline. Fluorine-free materials have considerably higher surface energies and are therefore not suitable for a high level of oil repellency for physical/chemical reasons. We will substantiate this with concrete scientific evidence in the further course of the consultation.

B. Relief sought

- (7) Although we acknowledge that the current proposal already contains a temporary derogation regarding textiles for the use in filtration and separation media used in high performance air and liquid applications in industrial or professional settings that require a combination of water-and oil repellence, we submit that there should be general derogation for such textiles and in particular high performance membranes. If considered necessary, a general derogation could also be supplemented to enable the Commission to review the exemption in the light of new scientific information, including information on alternative substances and materials, and, if appropriate, modify this paragraph accordingly by a specific date, for example 5 years after entry into force.
- (8) Alternatively, we submit that the derogation period should be expanded to up to 13,5 years, due to the fact that in particular with regard to high performance membranes

as produced by Schreiner Group and as used for multiple applications in various sectors there are no alternatives available on the market.

C. Further submissions

- (9) The above statements and observations will be further substantiated in the course of the consultation process having regard to the instructions to be provided in the online information session on 5 April 2023. In particular, we will provide further comments on the lack of fluorine-free alternatives and the specific consequences for our company. For the time being, we kindly request ECHA, including RAC and SEAC, as well Member States to consider this initial submission as a preliminary statement.

We would be happy to assist in case there are any further questions. Please do not hesitate to contact us, in case specific contributions might be considered helpful.

Yours sincerely,



Thomas Köberlein, Oberschleißheim, 22.03.2023
President Schreiner ProTech
Schreiner Group GmbH & Co. KG, Business Unit Protech