

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

The technical functions provided by ETFE are persistence and fusibility. Persistence is required for valves in the following categories.

- Valve linings used to transfer electronic material process liquids in the semiconductor and electronics categories.
- Valve linings used in manufacturing equipment for intermediates and active pharmaceutical ingredients in the pharmaceutical manufacturing category.

- Valve linings used for transfer of various process liquids in multi-plants in the pharmaceutical manufacturing category.
- Valve linings used to transfer fluids for sterilization and drainage processes in the pharmaceutical manufacturing category.
- Valve linings used in lines for various acidic/alkaline process liquids in the chemical industry category.
- Valve linings used for transfer and storage of corrosive fluids in the chemical industry category.
- Valve linings used in chemical lines of electrolysis equipment in the chemical industry category.
- Valve linings used in chemical liquid filling lines in the chemical industry category.
- Valve linings used in chemical dosing equipment for pretreatment processes in the seawater desalination equipment category.
- Valve linings used in chemical lines for pure water equipment and wastewater treatment equipment in the industrial water category.
- Neutralization equipment in the water and sewage treatment category, lining of valves used in chemical lines of filtration equipment.
- Valve linings used in chemical lines for additives, neutralization, and saccharification processes in the food manufacturing category.
- Valve linings used to transfer fluids for sterilization and drainage processes in the food manufacturing category.
- Valve linings used in chemical lines for industrial water and wastewater treatment equipment for iron and steel industry category.
- Valve linings used in plating liquids and pickling lines in the steel industry category.

- Valve linings used in chemical lines for neutralization equipment, wastewater treatment equipment, and electrolytic treatment equipment in the power generation water treatment category.

There are no polymers other than fluoropolymers such as PVDF and PFA that are resistant to decomposition and meltable provided by ETFE. 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 EoF”. It is desirable that the conditions of restriction corresponding to the multiple Uses described in this comment be clarified in the opinion of SEAC.