

EDRA Comments for Annex XV restriction report

Our sector views the possible wide impact of the restriction as leading to a situation where there are no alternatives available in many product areas, with consequent difficulties to purchase and sell some of the product groups. The retail trade would be affected by a PFAS ban in the areas of heating, air conditioning and refrigeration technology.

Our sector would appreciate a more specific approach with longer transition periods for defined product groups or even special consideration to be made for product groups without alternatives set against a different timeline.

PFAS are used as seals, hoses, lines, valves or even in coatings and a substitution in these special areas is often not possible. Either there are no alternatives or the special performance of PFAS cannot be achieved to the extent required to guarantee the functionality of these components. Due to the complete ban, neither the production of these components within the economic area nor their import from outside would be possible.

Due to a lack of alternatives, a general ban on PFAS would prevent a switch to more climate-friendly alternatives.

Due to the system-relevant importance of refrigeration technology - among other things for supplying the population - exceptions should apply to the entire area of refrigeration and air conditioning technology.

In order to avoid standstill, the exception regulation should be coupled with regular evaluations. The goal of the evaluation should be to determine the existence of practical – and competitive – alternatives to PFAS for the areas described here. As soon as these alternatives are widely and sufficiently available, the exceptions to the ban can be lifted.