

# Guidance on how to respond to the PFAS REACH restriction public consultation

Fluoropolymers Product Group (FPG)  
of Plastics Europe

24 March 2023



## **Notice**

This guidance document dates from 24 March and aims at helping you respond to the PFAS public consultation.

Should the need arise, we will update the guidance and share with you the latest version.

## **Disclaimer**

The information provided herein is for general informational purposes only. We have made every effort to ensure the accuracy and reliability of the information.

Further information on how to respond to the consultation can be found on the ECHA website:

[https://echa.europa.eu/documents/10162/13641/restriction\\_consultation\\_guidance\\_en.pdf/7c4705d5-ad01-43ed-a611-06f1426a595c](https://echa.europa.eu/documents/10162/13641/restriction_consultation_guidance_en.pdf/7c4705d5-ad01-43ed-a611-06f1426a595c)



## The Fluoropolymers Product Group

The **Fluoropolymers Product Group (FPG)** represents Europe's leading fluoropolymer producers and experts.

As the voice of the industry across Europe, the Fluoropolymers Product Group advocates for a balanced regulatory environment based on scientific facts to ensure that European industries remain competitive and sustainable.

Part of PlasticsEurope, the group's members are **3M, AGC, Arkema, Chemours, Daikin Chemicals, DuPont, Gujarat Fluorochemicals, Honeywell, W. L. Gore & Associates, and Solvay.**

# PFAS REACH restriction

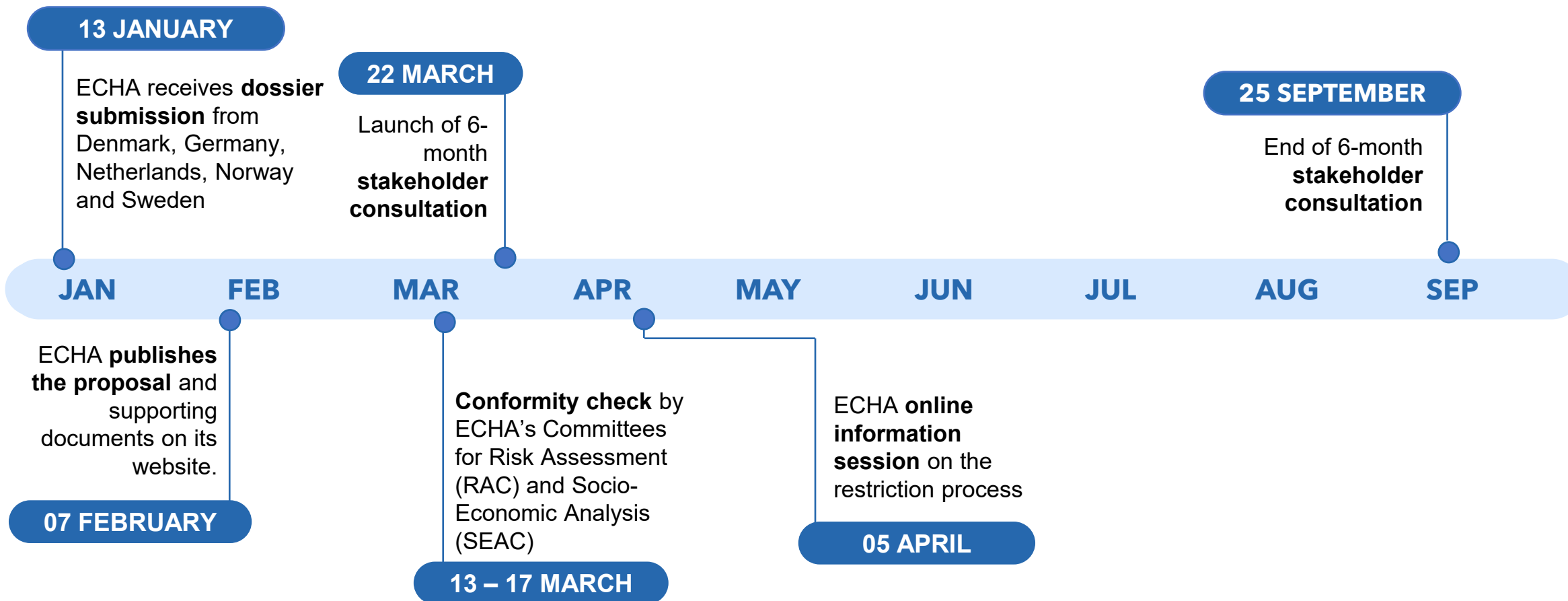
# What is the PFAS REACH restriction?

Since 2020, the competent authorities of the five countries (Denmark, Germany, Netherlands, Norway, Sweden) have been preparing a REACH restriction dossier for all PFAS. For them, REACH restriction “is considered to be the most effective and efficient way to manage such a large and complex group of substances that are used in numerous applications.” The restriction would cover PFAS manufacturing, use, and placement on the EU market.

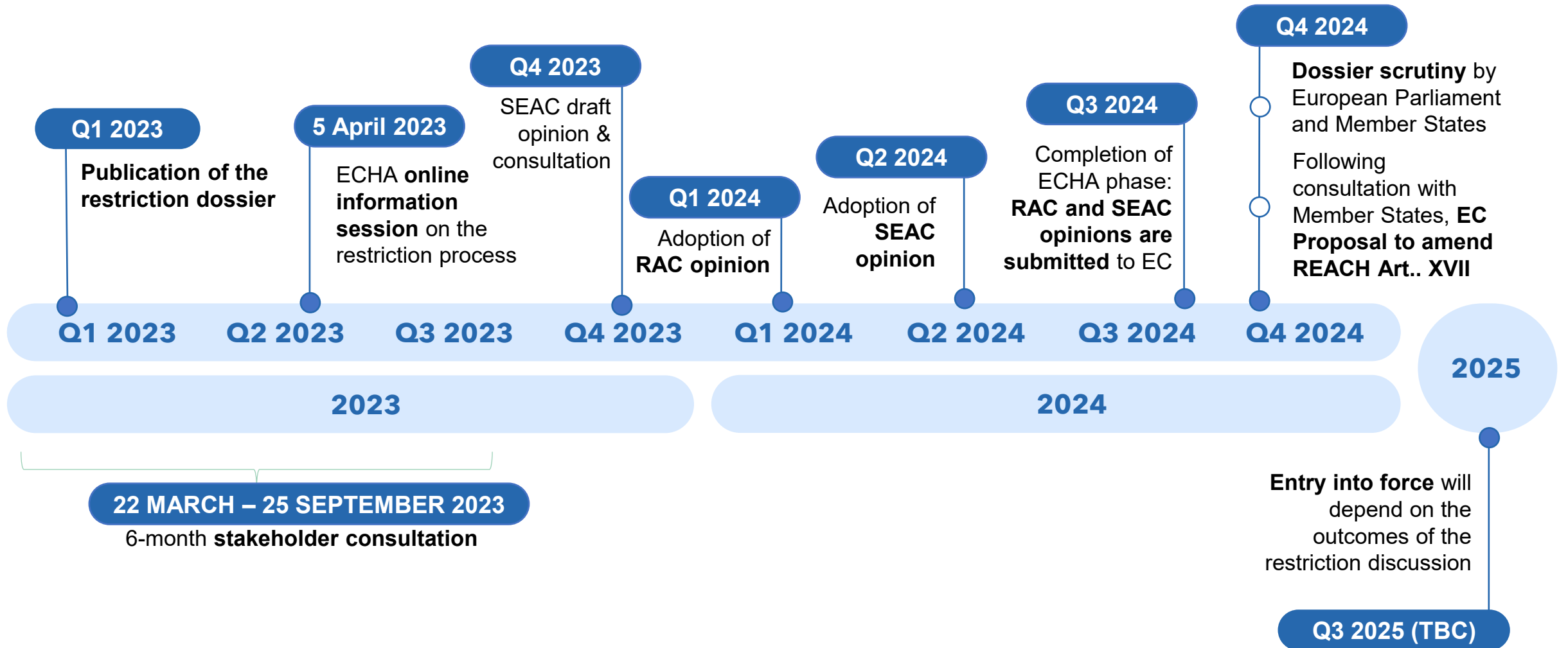
## REACH Restriction

- REACH restrictions limit, ban or set conditions on the manufacture, placing on the market (including imports) or use of a substance or group of substances.
- Restrictions are a measure for protecting human health and/or the environment from risks posed by chemicals on their own, in mixtures or in articles.

# Tentative timeline of EU PFAS REACH Restriction: 2023



# Tentative timeline of EU PFAS REACH Restriction: 2023-2025



# Guidance to the PFAS Public Consultation Response



# Important things to remember when drafting your response



You should present scientific and socio-economic data that can help prevent possible unjustified restriction of fluoropolymers.



In submitting your data, also clearly state why you need a derogation.



Only submit objective data in support of your response, avoid to draft a position paper that only makes statements.

# What to submit to the public consultation

Ensure your submission is visually easy to read and well-laid out on the page.

Introduce your sector and provide detail on the type of fluoropolymer that you use, and for which uses/application.

If your application is restricted as proposed, explain the impact you expect on your business and that of your customers.

If available, submit with your response scientific and/or socio-economic data (this can include studies or testing you may have carried out)

Submit data related to why you use FP, the performance criteria, function, and benefits of the use of fluoropolymers in your applications.

Submit information on alternatives (e.g., their availability and performance trade-offs vis-a-vis fluoropolymers).

Highlight standards & specifications needed to be met by your customer's requirements and the importance of fluoropolymers to reach those standards.

Submit any information related to releases and exposure and worker handling.

Do you use FP during maintenance? E.g. lubricants, greases or other products. Give information on these uses.

In your submission, recognise the importance of the PFAS restriction issue and the concerns of the regulators.

Key information should be clearly labelled, and any statements you make should be supported by factual scientific/socio-economic data that can help prevent possible unjustified restriction of fluoropolymers.

# Overview of areas to provide information on

## Life-cycle analysis

### Manufacturing

#### Manufacturing Equipment

- Does it contain...
- PTFE
  - PVDF
  - Other?

#### What product is being manufactured

- Use of FP\* processing aids?
- What product are you manufacturing containing FP?

#### Maintenance

- In maintaining your equipment & facility, do you use a FP? e.g.
- Lubricants
  - Other? ...

Some things to think about...

- ✓ What emissions are there at the manufacturing stage?
  - Are these well-controlled?
- ✓ What risks or hazards are there from working with FP? E.g. worker safety/health

### Use-phase

#### Function/ Benefits

- What function does the product containing FP have? Why is the function important?
- What is the lifetime of your product?

#### Alternatives

- Why are you using FP & not alternative? E.g. there is no alternative, FP delivers best performance, etc.
- Have you tried work with an alternative substance? What was the result?

Some things to think about...

- ✓ Have you made testing on your product e.g. degradation (losses to environment)? What were the results?
- ✓ Do your products need to meet any EU / international standard? If yes, which standards? Do you have any information on the testing process required to meet the standard?

### End-of-life

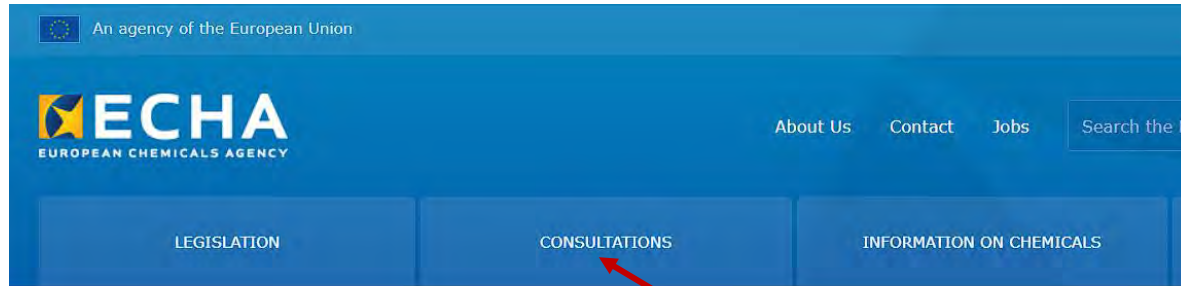
#### Fate

- What are the options for your application at EoL?
- Do you have data on emissions that are generated if e.g. landfilled or incinerated

Some things to think about...

- ✓ Do you know the end of life of the product your manufactured?
- ✓ Do you receive from your supplier, or do you provide guidance to your customers on correct disposal?
- ✓ Do you know if your product can be recycled?

# Where will you submit your data to?



Search our data

I have read and I accept the legal notice

Search for chemicals / regulated substances

e.g. Formaldehyde, or 200-001-8 or 50-00-0, or 605-001-00-5

[ADVANCED SEARCH >](#)

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Search for articles (products) in SCIP database



## ECHA seeks input on proposed PFAS restriction

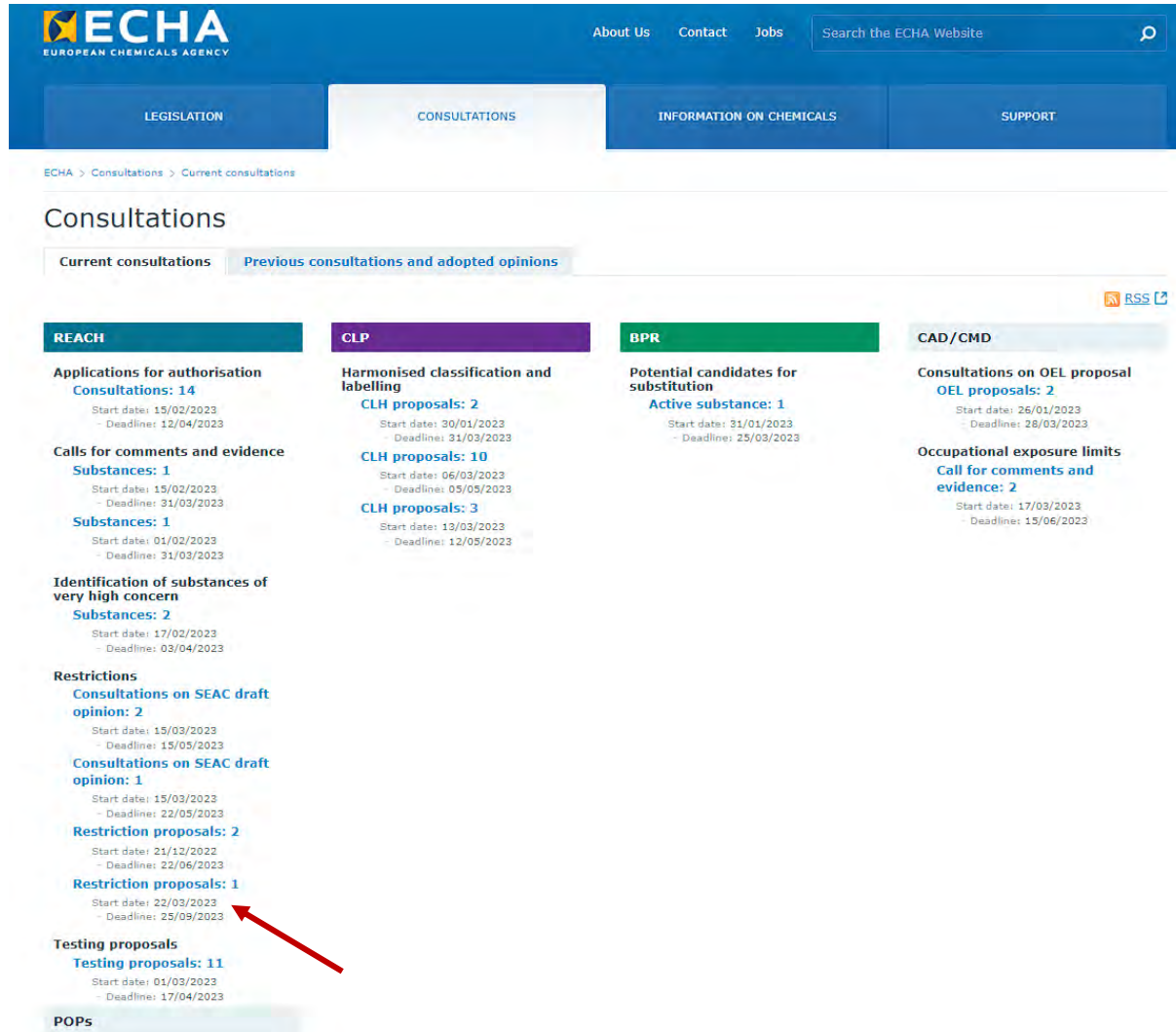
REACH

22/03/2023

The European Chemicals Agency invites interested parties to send in scientific and technical information on the manufacture, placing on the market and use of per- and polyfluoroalkyl substances (PFAS) by 25 September 2023.

- Navigate to ECHA website <https://echa.europa.eu/home>
- Go to the consultation tab of the central webpage of ECHA

# Where will you submit your data to?



The screenshot shows the ECHA website's 'Consultations' page. The navigation bar includes 'LEGISLATION', 'CONSULTATIONS', 'INFORMATION ON CHEMICALS', and 'SUPPORT'. The 'CONSULTATIONS' tab is active. Below the navigation, there are tabs for 'Current consultations' and 'Previous consultations and adopted opinions'. The 'Current consultations' tab is selected, showing a grid of consultation categories: REACH, CLP, BPR, and CAD/CMD. Each category lists various consultation types with their respective counts, start dates, and deadlines. A red arrow points to the 'Restriction proposals: 1' entry under the REACH category.

Category	Consultation Type	Count	Start Date	Deadline
REACH	Applications for authorisation	14	15/02/2023	12/04/2023
	Calls for comments and evidence	1	15/02/2023	31/03/2023
	Substances: 1	1	01/02/2023	31/03/2023
	Identification of substances of very high concern	2	17/02/2023	03/04/2023
	Restrictions on SEAC draft opinion: 2	2	15/03/2023	15/05/2023
	Consultations on SEAC draft opinion: 1	1	15/03/2023	22/05/2023
	Restriction proposals: 2	2	21/12/2022	22/06/2023
	Restriction proposals: 1	1	22/03/2023	25/09/2023
	Testing proposals	11	01/03/2023	17/04/2023
	POPs			
CLP	Harmonised classification and labelling	2	30/01/2023	31/03/2023
	CLH proposals: 10	10	06/03/2023	05/05/2023
	CLH proposals: 3	3	13/03/2023	12/05/2023
BPR	Potential candidates for substitution	1	31/01/2023	25/03/2023
CAD/CMD	Consultations on OEL proposal	2	26/01/2023	28/03/2023
	Occupational exposure limits	2	17/03/2023	15/06/2023

Under Current Consultations go to REACH Restriction proposals and select 'Restriction proposals: 1'

# Where will you submit your data to?

ECHA > Consultations > Submitted restrictions under consideration

## Submitted restrictions under consideration

This table shows ongoing consultations on conforming restriction proposals and SEAC draft opinions; the links to the web forms for submitting comments to ECHA during the relevant consultations can be found by clicking on details. For consultations on conforming restriction proposals, two deadlines are given; comments submitted by the first deadline are often very influential as they will be considered in the first discussion on the proposed restriction and more substantial comments should be submitted at the latest 1 month before the final deadline.

**Please note:** the ECHA Committees will not take into account the comments received after the final deadline in their opinion making process.

**Consultations close at 23:59 Helsinki time (EET).**

[Restriction](#)

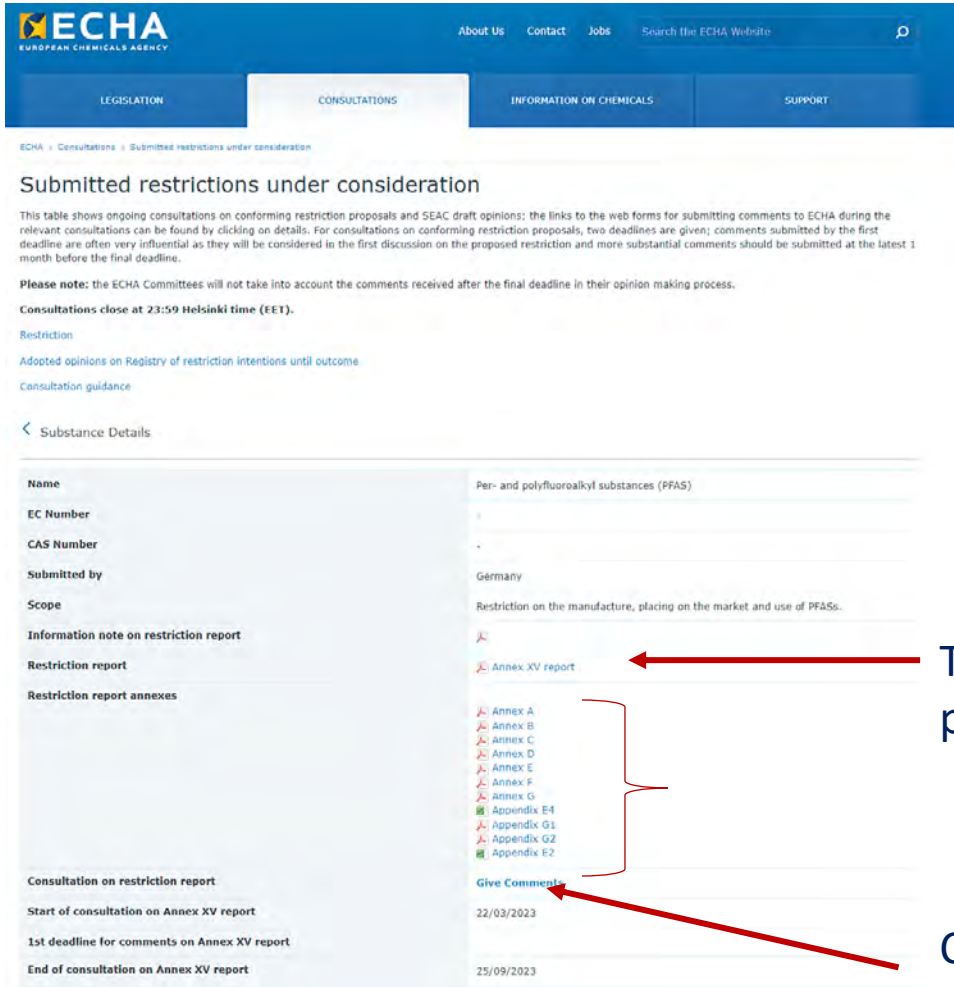
[Adopted opinions on Registry of restriction intentions until outcome](#)

[Consultation guidance](#)

Name	EC Number	CAS Number	Start of consultation on Annex XV report	1st deadline for comments on Annex XV report	End of consultation on Annex XV report	Start of consultation on SEAC draft opinion	End of consultation on SEAC draft opinion	
Bisphenols with endocrine disrupting properties for the environment and their salts	-	-	21/12/2022	25/01/2023	22/06/2023			<a href="#">Details</a>
Creosote and Creosote related substances	-	-	21/12/2022	25/01/2023	22/06/2023			<a href="#">Details</a>
Medium-chain chlorinated paraffins (MCCP) and other substances that contain chloroalkanes with carbon chain lengths within the range from C14 to C17	-	-	21/09/2022	21/10/2022	22/03/2023			<a href="#">Details</a>
N,N-dimethylacetamide (DMAc); 1-ethylpyrrolidin-2-one (NEP)	-	-	20/06/2022	20/07/2022	20/12/2022	15/03/2023	22/05/2023	<a href="#">Details</a>
Per- and polyfluoroalkyl substances (PFAS)	-	-	22/03/2023		25/09/2023			<a href="#">Details</a>
Per- and polyfluoroalkyl substances (PFASs) in firefighting foams	-	-	23/03/2022	24/05/2022	23/09/2022	15/03/2023	15/05/2023	<a href="#">Details</a>
Terphenyl, hydrogenated	262-967-7	61788-32-7	20/06/2022	20/07/2022	20/12/2022	15/03/2023	15/05/2023	<a href="#">Details</a>

- In the Submitted restrictions under consideration you will see **“Per- and polyfluoroalkyl substances (PFAS)”**
- Click on ‘details’.

# Where will you submit your data to?



**ECHA**  
EUROPEAN CHEMICALS AGENCY

About Us Contact Jobs Search the ECHA Website

LEGISLATION CONSULTATIONS INFORMATION ON CHEMICALS SUPPORT

ECHA > Consultations > Submitted restrictions under consideration

### Submitted restrictions under consideration














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Restriction  
Adopted opinions on Registry of restriction intentions until outcome  
Consultation guidance

< Substance Details

Name	Per- and polyfluoroalkyl substances (PFAS)
EC Number	-
CAS Number	-
Submitted by	Germany
Scope	Restriction on the manufacture, placing on the market and use of PFASs.
Information note on restriction report	
Restriction report	 Annex XV report
Restriction report annexes	 Annex A  Annex B  Annex C  Annex D  Annex E  Annex F  Annex G  Appendix E4  Appendix G1  Appendix G2  Appendix E2
Consultation on restriction report	<a href="#">Give Comments</a>
Start of consultation on Annex XV report	22/03/2023
1st deadline for comments on Annex XV report	
End of consultation on Annex XV report	25/09/2023

- On the left you can see the main page on the PFAS restriction. You can directly access this page from here: <https://echa.europa.eu/restrictions-under-consideration/-/substance-rev/72301/term>
- You will submit your response by clicking the 'Give Comments' link

The restriction proposal

Click the link 'Give Comments'

# What data do you need to provide?



**ECHA**  
EUROPEAN CHEMICALS AGENCY

### Comments for Annex XV restriction report

Substance name	EC Number
Per- and polyfluoroalkyl substances (PFAS)	

**CAS Number**  
-

**Scope**  
Restriction on the manufacture, placing on the market and use of PFAS.

Before you fill in the form, read the **Consultation Guidance** and the specific **Information Note** as they explain both the process and the proposal itself.

[Link to the Consultation Guidance](#)  
[Link to the Information Note](#)

Compulsory fields/tick boxes are marked with an asterisk (\*)  
\*  I have read the Consultation Guidance and Information Note

All non-confidential comments will be made publicly available once a month during the duration of the consultation.

The Consultation is intended to provide ECHA's Committees with scientific and technical information to assist them in the development of their opinions. Although other information can be submitted, any abusive comments will not be published monthly and only published at the end of the process without any response from the Dossier Submitter or the Rapporteurs.

Where did you learn about this consultation? (please select all that apply):\*

- By selecting to submit comments you will be forwarded to a new page similar to the one on your left (this is an example from another substance restriction).
- In this page information on the substance and scope of the restriction will be mentioned.
- ECHA also provides you with a guide to walk you through the consultation process. You can find this link here:  
[https://echa.europa.eu/documents/10162/13641/restriction\\_consultation\\_guidance\\_en.pdf/7c4705d5-ad01-43ed-a611-06f1426a595c](https://echa.europa.eu/documents/10162/13641/restriction_consultation_guidance_en.pdf/7c4705d5-ad01-43ed-a611-06f1426a595c)



# What data do you need to provide?

**SECTION I. Personal information**  
We may contact you about your comment and to request additional information.

\* First Name :  \* Family Name :

Email: \*  \* Country :

Phone :

Any personal data submitted is subject to [ECHA's data privacy rules](#)

**SECTION II. Organisation**  
I am submitting information: \*

On behalf of a Member State Competent Authority

As an Individual

On behalf of an organisation or institution

Type of organisation/institution:

Country where the organisation or institution is legally established:

Name of organisation / institution:

Select one of the following options : \*

I agree to the disclosure of the name of my organisation/institution to the public

I want to keep the name of my organisation/institution confidential

Note: the type and country of your organisation/institution will always be disclosed.

- Lower in the same webpage you need to provide information on different section including:
  - Personal information
  - Organisation
  - Non-confidential comments
  - Non-confidential attachment
  - Confidential Attachment
- Some fields (like name and last name) are obligatory to be filled in and you cannot submit your comments unless you have completed them.

# What data do you need to provide?

## SECTION III. Non-confidential comments

It is possible to provide both general comments on the Annex XV restriction report subject to this Consultation and answers to the specific questions posed. In both cases, it is necessary to provide supporting evidence to allow ECHA's Committees to take your comments into account. It is important not to leave the submission of any socio-economic information until the consultation on SEACs opinion but already submit relevant comments at this stage.

### General Comments

Select the relevant boxes that cover the content of your comments and provide your non-confidential comments below. (maximum 9 000 characters)

- Scope or restriction option analysis
- Hazard or exposure
- Environmental emissions
- Baseline
- Description of analytical methods
- Information on alternatives
- Information on benefits
- Other socio economic analysis (SEA) issues
- Transitional period
- Request for exemption

\*  I understand that it is my responsibility not to include confidential information in responses to general comments and in any responses to requests for specific information (e.g. company name, email addresses, phone numbers, signatures etc.). ECHA will not be held liable for any damages caused by making non confidential responses publicly available.

Please provide your general comments in the box below

- ECHA has written a short document specifically related to providing information on the PFAS restriction public consultation: <https://echa.europa.eu/documents/10162/cad38c27-ed8-2268-00c6-939ea066743c>
- If you intend to submit information to the consultation comments which are not confidential can be submitted through the platform as you see on your left.
- There will likely be a maximum number of words you could insert in the box.
- However, you are also able to submit information in an attachment.

# ECHA has specific information requests

**1: Specific Information Requests**

**1:**  
**Sectors and (sub-)uses:** Please specify the sectors and (sub-)uses to which your comment applies according to the sectors and (sub-)uses identified in the Annex XV restriction report (Table 9). If your comment applies to several sectors and (sub-)uses, please make sure to specify all of them.

\* Compulsory Fields:

I have information on this topic  
 I don't have information on this topic

**2:**  
**Emissions in the end-of-life phase:** The environmental impact assessment does not cover emissions resulting from the end-of-life phase. To get a better understanding of the extent of the resulting underestimation, (sub-)use-specific information is requested on emissions across the different stages of the lifecycle of products, i.e. the manufacture phase, the use phase and the end-of-life phase. Please provide justifications for the representativeness of the provided information. In particular:

- Please provide, at the (sub-)use level, an indication of the share of emissions (as percentages) attributable to these three different stages. An indication of annual emission volumes in the end-of-life phase at sector or sub-sector level would also be appreciated.
- If possible, please provide for each (sub-)use what share of the waste (as percentages) is treated through incineration, landfilling and recycling. Please provide information to justify the estimates as well as information on the form of recycling referred to.

\* Compulsory Fields:

I have information on this topic  
 I don't have information on this topic

**3:**  
**Emissions in the end-of-life phase:** With respect to waste management options, additional information is requested on the effectiveness of incineration under normal operational conditions (for different waste types, e.g. hazardous, municipal) with respect to the destruction of PFAS and the prevention of PFAS emissions.

\* Compulsory Fields:

I have information on this topic  
 I don't have information on this topic

**4:**  
**Impacts on the recycling industry:** To get an understanding of the impacts of the proposed restriction on the recycling industry, information is requested on:

- The impacts that the concentration limits proposed in paragraph 2 of the proposed restriction entry text (see table starting on page 4 of the summary of the Annex XV restriction report) have on the technical and economic feasibility of recycling processes (together with a clear indication on the waste streams to which the described impacts relate).
- The measures that recyclers would need to take to achieve the proposed concentration limits.

In addition to information that you would like to submit, you are also asked if you have data in answer to a series of 10 questions - see following slides for more information

# ECHA has specific information requests 1/10

## Specific Information Requests

1:

**Sectors and (sub-)uses:** Please specify the sectors and (sub-)uses to which your comment applies according to the sectors and (sub-)uses identified in the Annex XV restriction report (Table 9). If your comment applies to several sectors and (sub-)uses, please make sure to specify all of them.

\* Compulsory Fields

I have information on this topic

I don't have information on this topic

- Table 9 can be found starting at page 116 of the [Annex XV report](#)
- With this question ECHA is asking for your sector (e.g. aviation, electronics, food contact, etc. ...); and then for the specific application/use. This information can be found mentioned in left-hand column of Table 9

# ECHA has specific information requests 2/10

2:

**Emissions in the end-of-life phase:** The environmental impact assessment does not cover emissions resulting from the end-of-life phase. To get a better understanding of the extent of the resulting underestimation, (sub-)use-specific information is requested on emissions across the different stages of the lifecycle of products, i.e. the manufacture phase, the use phase and the end-of-life phase. Please provide justifications for the representativeness of the provided information. In particular:

- a. Please provide, at the (sub-)use level, an indication of the share of emissions (as percentages) attributable to these three different stages. An indication of annual emission volumes in the end-of-life phase at sector or sub-sector level would also be appreciated.
- b. If possible, please provide for each (sub-)use what share of the waste (as percentages) is treated through incineration, landfilling and recycling. Please provide information to justify the estimates as well as information on the form of recycling referred to.

\* Compulsory Fields

I have information on this topic

I don't have information on this topic

- We encourage you to submit data on manufacturing phase and use phase related to emissions. If you have this data, please submit to ECHA.
- End of Life is an area of concern for the dossier submitters as well, what happens to the fluoropolymer in an application at end of life?
  - ✓ Do you have specific information that can be shared with ECHA?

## ECHA has specific information requests 3/10

3:

**Emissions in the end-of-life phase:** With respect to waste management options, additional information is requested on the effectiveness of incineration under normal operational conditions (for different waste types, e.g. hazardous, municipal) with respect to the destruction of PFAS and the prevention of PFAS emissions.

\* Compulsory Fields

I have information on this topic

I don't have information on this topic

- Do you have information about incineration?
  - ✓ For your information fluoropolymer manufacturers are working on an incineration study and will submit information during the course of the public consultation period.

# ECHA has specific information requests 4/10

4:

**Impacts on the recycling industry:** To get an understanding of the impacts of the proposed restriction on the recycling industry, information is requested on:

- The impacts that the concentration limits proposed in paragraph 2 of the proposed restriction entry text (see table starting on page 4 of the summary of the Annex XV restriction report) have on the technical and economic feasibility of recycling processes (together with a clear indication on the waste streams to which the described impacts relate).
- The measures that recyclers would need to take to achieve the proposed concentration limits.
- The costs associated with these measures.

⌘ Compulsory Fields

I have information on this topic

I don't have information on this topic

- Question is specifically targeted at the recycling community
  - ✓ For your information the fluoropolymer manufacturers are working on an incineration study and will submit information during the course of the public consultation period.

# ECHA has specific information requests 5/10

5:

**Proposed derogations – Tonnage and emissions:** Paragraphs 5 and 6 of the proposed restriction entry text (see table starting on page 4 of the summary of the Annex XV restriction report) include several proposed derogations. For these proposed derogations, information is requested on the tonnage of PFAS used per year and the resulting emissions to the environment for the relevant use. Please provide justifications for the representativeness of the provided information.

\* Compulsory Fields

- I have information on this topic
- I don't have information on this topic

- A further question on amount of PFAS used
  - ✓ Do you have data showing the tonnage (or less) of fluoropolymers that you use?
  - ✓ What information can you share related to the possible emission of fluoropolymers to the environment?



# ECHA has specific information requests 6/10

6:

**Missing uses – Analysis of alternatives and socio-economic analysis:** Several PFAS uses have not been covered in detail in the Annex XV restriction report (see uses highlighted in blue and orange in Table A.1 of Annex A of the Annex XV restriction report). In addition, some relevant uses may not have been identified yet. For such uses, specific information is requested on alternatives and socio-economic impacts, covering the following elements:

- a. The annual tonnage and emissions (at sub-sector level) and type of PFAS associated with the relevant use.
- b. The key functionalities provided by PFAS for the relevant use.
- c. The number of companies in the sector estimated to be affected by the restriction.
- d. The availability, technical and economic feasibility, hazards and risks of alternatives for the relevant use, including information on the extent (in terms of market shares) to which alternative-based products are already offered on the EU market and whether any shortages in the supply of relevant alternatives are expected.
- e. For cases in which **alternatives are not yet available**, information on the status of R&D processes for finding suitable alternatives, including the extent of R&D initiatives in terms of time and/or financial investments, the likelihood of successful completion, the time expected to be required for substitution (including any relevant certification or regulatory approvals) and the major challenges encountered with alternatives which were considered but subsequently disregarded.
- f. For cases in which **substitution is technically and economically feasible** but more time is required to substitute:
  - i. the type and magnitude of costs (at company level and, if available, at sector level) associated with substitution (e.g. costs for new equipment or changes in operating costs);
  - ii. the time required for completing the substitution process (including any relevant certification or regulatory approvals);
  - iii. information on possible differences in functionality and the consequences for downstream users and consumers (e.g. estimations of expected early replacement needs or expected additional energy consumption);
  - iv. information on the benefits for alternative providers.
- g. For cases in which **substitution is not technically or economically feasible**, information on what the socio-economic impacts would be for companies, consumers, and other affected actors. If available, please provide the annual value of EU sales and profits of the relevant sector, and employment numbers for the sector.

\* Compulsory Fields

- I have information on this topic
- I don't have information on this topic

- The dossier submitters accept that there are uses that are missing from their proposal
  - ✓ Is your use of fluoropolymers missing from the Annex XV report? You should submit information on your uses, and take into consideration the supplementary information ECHA seeks in the questions a to g

# ECHA has specific information requests 7/10

7:

**Potential derogations marked for reconsideration – Analysis of alternatives and socio-economic analysis:** Paragraphs 5 and 6 of the proposed restriction entry text (see table starting on page 4 of the summary of the Annex XV restriction report) include several potential derogations for reconsideration after the consultation (in [square brackets]). These are uses of PFAS where the evidence underlying the assessment of the substitution potential was weak. The substitution potential is determined on the basis of i) whether technically and economically feasible alternatives have already been identified or alternative-based products are available on the market at the assumed entry into force of the proposed restriction, ii) whether known alternatives can be implemented before the transition period ends (taking into account time requirements for substitution and certification or regulatory approval), and iii) whether known alternatives are available in sufficient quantities on the market at the assumed entry into force to allow affected companies to substitute.

A summary of the available evidence as well as the key aspects based on which a derogation is potentially warranted are presented in Table 8 in the Annex XV restriction report, with further details being provided in the respective sections in Annex E.

To strengthen the justifications for a derogation for these uses, additional specific information is requested on alternatives and socio-economic impacts covering the elements described in points a) to g) in question 6 above.

\* Compulsory Fields

- I have information on this topic
- I don't have information on this topic

- Please find Annex E [here](#)
- The dossier submitters were unable to provide a clear proposal for derogation of some applications. Stakeholders are encouraged to share detailed information that would help ECHA reach the opinion for derogations in such examples.
- Do you disagree with the evidence presented by the dossier submitters on alternatives? In responding to this question you are encouraged to provide information on your uses and provide evidence about your current use of fluoropolymers against any alternative that is proposed and why it is not a suitable substitute. Provide information when responding, that covers things like function, performance, life-time. Support your position by submitting technical, scientific and socio-economic data.

# ECHA has specific information requests 8/10

8:

**Other identified uses – Analysis of alternatives and socio-economic analysis:** Table 8 in the Annex XV restriction report provides a summary of the identified sectors and (sub-)uses of PFAS, their alternatives and the costs expected from a ban of PFAS. More details on the available evidence are provided in the respective sections in Annex E.

For many of the (sub-)uses, the information on alternatives and socio-economic impacts was generic and mainly qualitative. In particular, evidence on alternatives was inconclusive for some applications falling under the following (sub-)uses: technical textiles, electronics, the energy sector, PTFE thread sealing tape, non-polymeric PFAS processing aids for production of acrylic foam tape, window film manufacturing, and lubricants not used under harsh conditions.

More information is needed on alternatives and socio-economic impacts to conclude on substitution potential, proportionality, and the need for specific time-limited derogations. Therefore, specific information (if not already included in the Annex XV restriction report or covered in the questions above) is requested on alternatives and socio-economic impacts covering the elements listed in points a) to g) in question 6 above.

\* Compulsory Fields

- I have information on this topic
- I don't have information on this topic

- The dossier submitters were unable to provide a clear case for derogation of some applications due to a lack of data/evidence received during their calls for evidence.
- Stakeholders are encouraged to share detailed information that would help ECHA reach the opinion for derogations in such examples.
- You should share information on your uses, availability of alternatives and their feasibility vs fluoropolymers. Clearly state why you are not able to substitute a fluoropolymer for an alternative substance, and provide evidence to support this point. E.g. evidence from testing of alternatives in your application.

# ECHA has specific information requests 9/10

9:

**Degradation potential of specific PFAS sub-groups:** A few specific PFAS sub-groups are excluded from the scope of the restriction proposal because of a combination of key structural elements for which it can be expected that they will ultimately mineralize in the environment. RAC would appreciate to receive any further information that may be available regarding the potential degradation pathways, kinetics or produced metabolites in relevant environmental conditions and compartments for trifluoromethoxy, trifluoromethylamino- and difluoromethanedioxy-derivatives.

\* Compulsory Fields

- I have information on this topic
- I don't have information on this topic

- ECHA would welcome further information related to trifluoromethoxy, trifluoromethylamino- and difluoromethanedioxy-derivatives.
- If you are a user of these, and have any of the information ECHA is seeking, please consider sharing it.

# ECHA has specific information requests 10/10

## 10:

**Analytical methods:** Annex E of the Annex XV restriction report contains an assessment of the availability of analytical methods for PFAS. Analytical methods are rapidly evolving. Please provide any new or additional information on new developments in analytics not yet considered in the Annex XV restriction report.

\* Compulsory Fields

- I have information on this topic
- I don't have information on this topic

- ECHA would welcome feedback from stakeholders on the analytical methods for PFAS presented in Annex E.

# Submitting attachments

## SECTION IV. Non-confidential attachment

If needed, attach additional non-confidential information (data available in excel format, reports, etc.) below. Do not attach the same information already provided in section III here. If part of the information is confidential, please use section V to share it

Add attachment

If you would like to submit more than one document, please create a compressed archive where you include all files and upload the compressed file as attachment. Maximum file size is 20 MB.

I have removed/blanked the information I wish to keep/I have claimed confidential from all the attachments in section IV (e.g.: company name, company logo, personal names, email, signatures, other confidential business data). I understand that ECHA will not be held liable for any damages caused by making the attachments publicly available.

## SECTION V. Confidential Attachment

If needed, attach confidential information below (for example: studies, laboratory tests, additional contact details, business data, etc.). Do not add the same information already provided in the previous sections here. Confidential information will only be used by ECHA, including its Committees, by the Member State competent authorities and by the European Commission.

If you upload a confidential attachment, please justify the reasons for confidentiality of the information in the field below. This will facilitate ECHA's work if it receives requests for access to documents.

Upload Confidential Attachment:

Add attachment

If you would like to submit more than one document, please create a compressed archive where you include all files and upload the compressed file as attachment. Maximum file size is 20 MB.

I have the following reasons enumerated in Article 4(1) or 4(2) of [Regulation \(EC\) No 1049/2001](#) regarding public access to documents why the information submitted as confidential cannot be disclosed to persons requesting access to documents (please explain below in the commenting field those reasons; a reason could be that the protection of your commercial interests, including intellectual property, would be undermined).

No confidential information of any kind should be included:

- You have the option to attach confidential and/or non-confidential information.
- It is your decision which information you will select to be submitted.

# ECHA Webinar 5 April

## Restriction of per- and polyfluoroalkyl substances (PFAS) under REACH

### Webinar date

5 April 2023 11:00 - 13:00 GMT +2

### Summary

Germany, the Netherlands, Denmark, Norway and Sweden have proposed a REACH restriction to address the risks to the environment and human health from the manufacture, placing on the market and use of per- and polyfluoroalkyl substances (PFAS).

A six-month consultation on the proposal starts on 22 March 2023. Join the event to learn about the restriction proposal, how the REACH restriction process works and how to participate in the consultation.

Follow from our home page on 5 April at 11:00 EEST GMT +2. No registration is required. The event will be streamed from our YouTube channel [EUchemicals](#). If you wish to receive a notification before the start of the streaming you can [subscribe to the channel](#).

The recording of the event will be published on this page shortly after the broadcast.

The QnA session will be organised with Sli.Do platform. We encourage you to **send your questions well ahead of the event**. Having the questions in advance helps the five national authorities and ECHA to prepare and respond to as many questions as possible during the live QnA session until 13:00.

You can submit your questions the window below or [using this link](#).



☰ Restriction of per... Q&A Polls 👤



👤 Type your question

- ECHA will host a webinar on 5 April from 11am (Helsinki time)/10am (Brussels-time) for 2 hours.
- More information can be found here: <https://echa.europa.eu/en/-/restriction-of-per-and-polyfluoroalkyl-substances-pfass-under-reach>
- A live Q&A session along with a pre-recorded presentation introducing the restriction proposal will be held.
- If you have any questions you wish to submit to ECHA to be answered during the webinar, please submit them here: <https://app.sli.do/event/rpXRNehHxcfsKJcLWVghzG/live/questions>

## Finally, talk and share with us

- Visit our **website** <https://fluoropolymers.plasticseurope.org/> to know all the fact and figures
- Join us on **LinkedIn** <https://www.linkedin.com/company/fluoropolymers-product-group> and follow us on **Twitter** [https://twitter.com/FPG\\_EU](https://twitter.com/FPG_EU)
- Read **our regular newsletter** to keep abreast of the latest developments at EU level. To subscribe visit our website or send an email to [brusselsbcwfluoropolymers@bcw-global.com](mailto:brusselsbcwfluoropolymers@bcw-global.com)
- Provide us with case studies of vital uses of fluoropolymers in your sector – for publication on the FPG website/LinkedIn

