

FPP4EU and PFAS REACH restriction

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23 February 2023

The European Chemical Industry Council, AISBL – Rue Belliard, 40 - 1040 Brussels – Belgium
Transparency Register n°64879142323-90



PFAS and PFAS applications

Who are we

Universal PFAS restriction

The Collaboration Platform

Call for action



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PFAS definition

Substances that contain at least one fully fluorinated methyl (CF₃-) or methylene (-CF₂-) carbon atom (without any H/Cl/Br/I atom attached to it).

**There are theoretically
hundreds or even millions
of PFAS molecules**



Note: This includes among others short and long chain PFAS, fluoropolymers and F-Gases.



PFAS APPLICATIONS

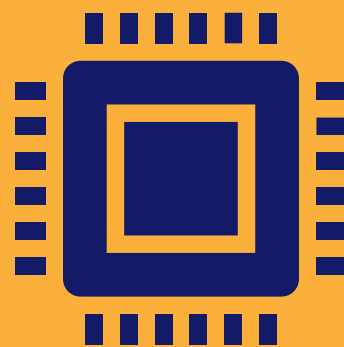




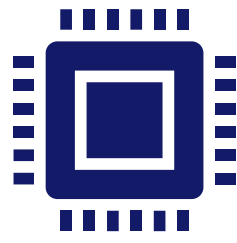
AUTOMOTIVE

AUTOMOTIVE

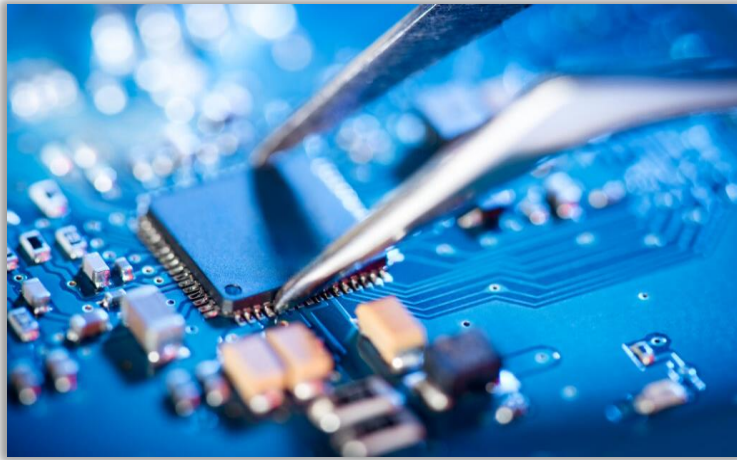




ELECTRONICS



ELECTRONICS





HEALTH



HEALTH





**RENEWABLE
ENERGY**

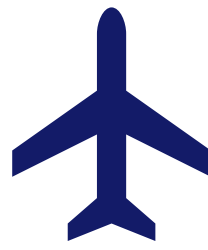


RENEWABLE ENERGY

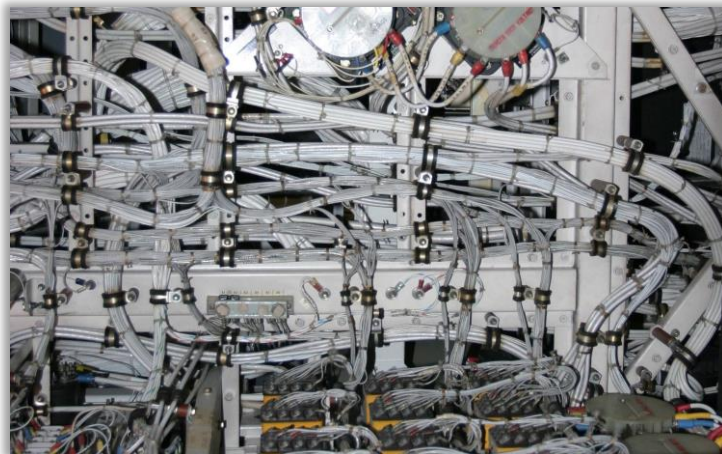




**AEROSPACE &
DEFENCE**



AEROSPACE & DEFENCE





AGRI-FOOD

AGRI-FOOD





TEXTILES



TEXTILES



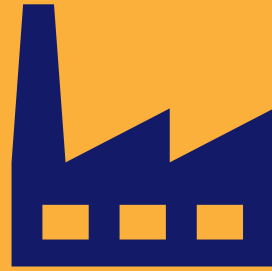


CONSTRUCTION



CONSTRUCTION

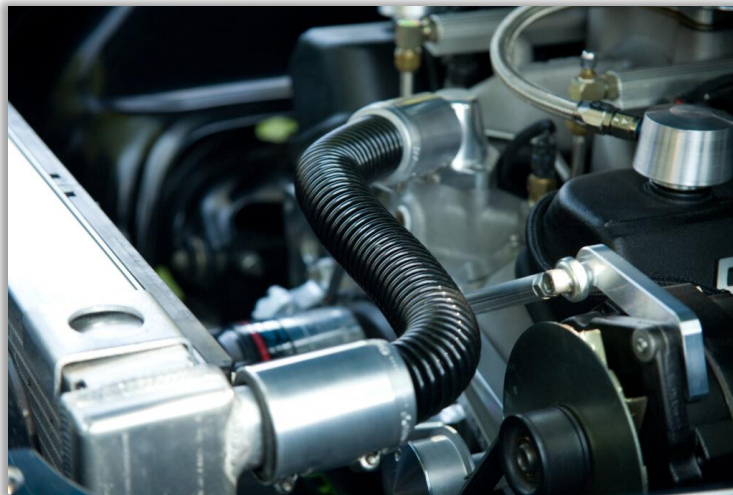




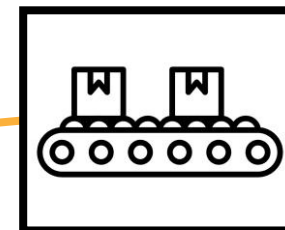
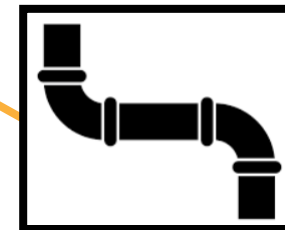
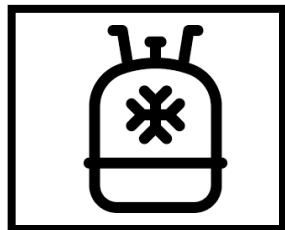
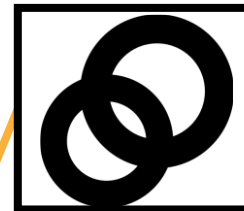
Industrial settings



Industrial settings



PFAS materials used in factories



PFAS and PFAS applications

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FPP4EU Vision – in a nutshell

We understand and support the need for balanced regulatory action on PFAS.

We seek to aid EU policymakers in achieving the ambitions set out in the EU Green Deal.

Aim is to come jointly to a final regulatory measure which:

- *is science-informed, implementable, and enforceable;*
- *enables the EU to meet its Green Deal, economic and other policy objectives.*

Our plans:

- *obtain common understanding of what a PFAS restriction under REACH may look like,*
- *collaborate and engage in constructive dialogues with all EU stakeholders,*
- *support further research and data generation to fill potential data gaps.*



Who are we?

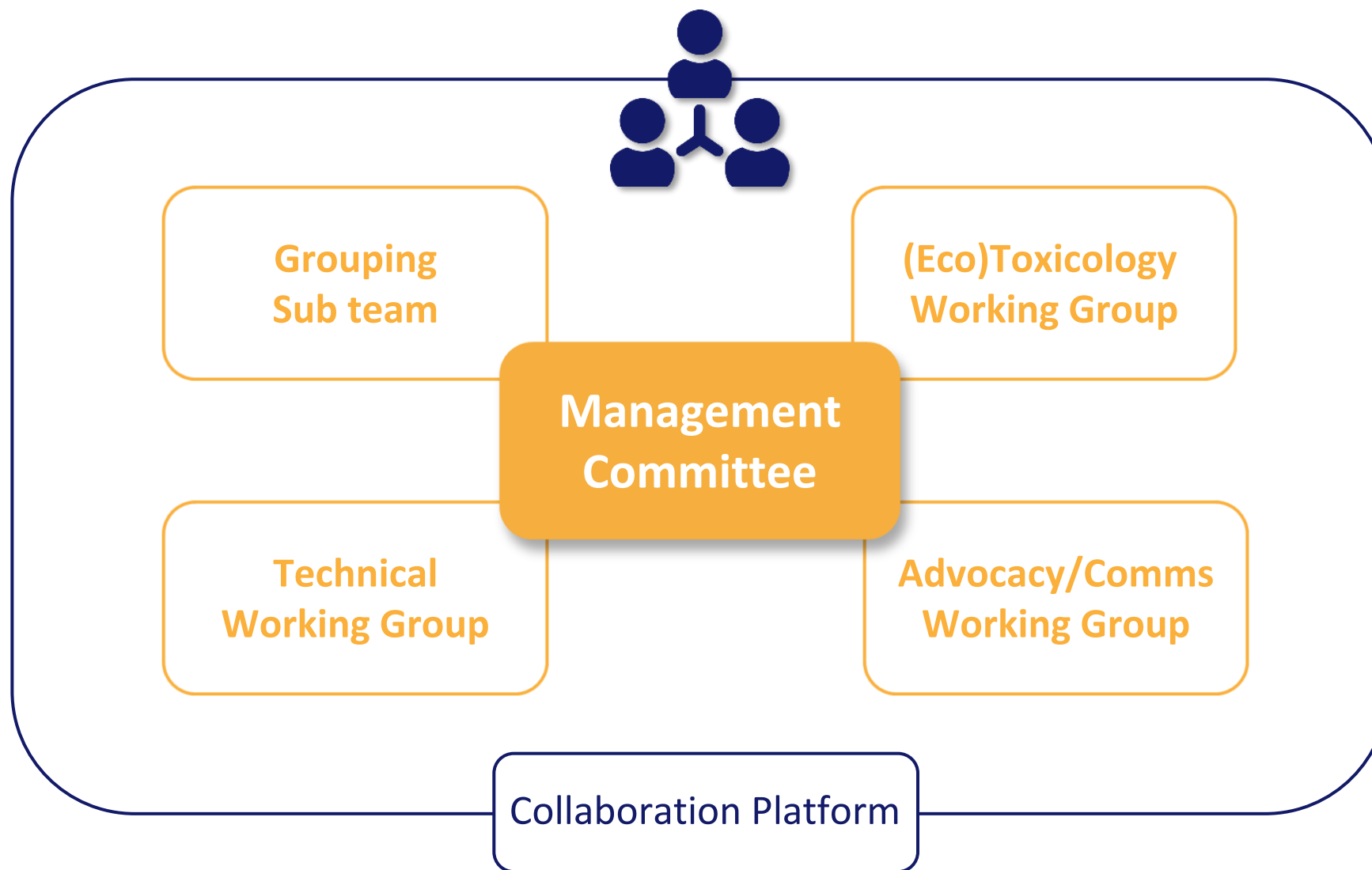
Membership



Represents producers, importers and users
of the many potential substances
that fall within the broad definition of PFAS.



How are we organized?



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The U-PFAS restriction proposal

- **Objective of the Universal PFAS (U-PFAS) restriction**

Starting point is a BAN on PFAS:

Regularity option 1 no derogations and a transition period of 18 months

Regulatory option 2 some use-specific derogations with transition periods

- **Justification by the 5 Competent Authorities:**

Persistence is key for justifying the restriction in terms of risk, all PFAS are persistent by themselves or degrade to other persistent PFAS

There are other concerns (mobility, toxicity,) that vary among PFASs

Emissions need to be addressed: estimated emissions of about 4.4 million tones over 30 years if no action taken

- **Scope**

Very broad, includes fluoropolymers, perfluoropolyethers, F-gases and side-chain fluorinated polymers. Some PFAS deemed non persistent are excluded



The U-PFAS restriction proposal

- An **unprecedented restriction** that imposes a ban on the **manufacturing**, placing on the market and use of PFAS, together with a ban on placing on the market of mixtures or articles containing PFAS above a specific concentration level and includes use specific derogations.
- **PFAS used in industry settings** are included in the scope.

If a use is not derogated = banned 18m after Entry into Force (EiF)



The U-PFAS restriction proposal

Three main types of derogations:

- **Exclusion** (time-unlimited derogation) for active substances in plant protection, biocidal, human & veterinary medicinal products (with a reporting obligation).
- **Evidence-based time-limited derogations** (6.5 or 13.5 years after EiF):
cover specific uses in food contact materials, medical devices, membranes in fuel cells, refrigerants, insulating materials, textiles, etc.
- **Time-limited derogations** (6.5 or 13.5 years after EiF) **with a weak base evidence**:
cover *inter alia* certain uses of PFAS in textiles (incl. PPE), very specific industrial uses, engineered fluids for medical devices, transport applications, etc.



Conclusions and impact

- Plant production products, biocides and human & veterinary medicines active substances derogated, but no derogation for intermediates, processing aids.
- **46 time-limited derogations on very specific uses.** Most of them covering industrial and professional uses, medical devices, textiles (PPE) and refrigerants.
- **Consumer uses** e.g. cosmetics, home and electronic appliances, textiles etc. are banned with few exceptions.
- The objective of the proposal submitted by the competent authorities is to **ban the manufacture, production, use and import of PFAS in EU.**

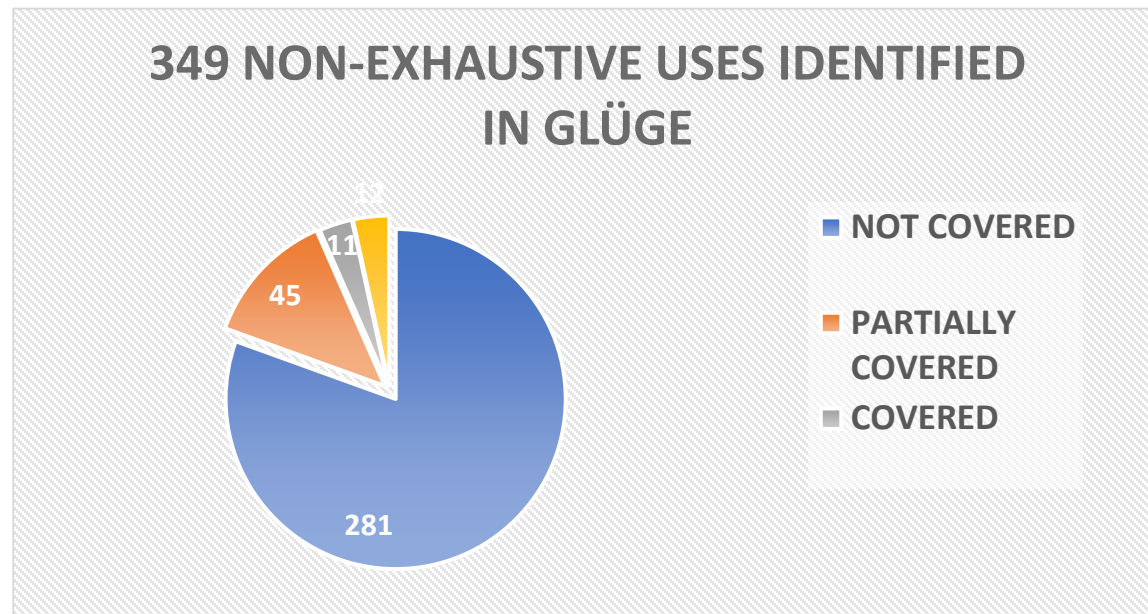


■ The U-PFAS restriction

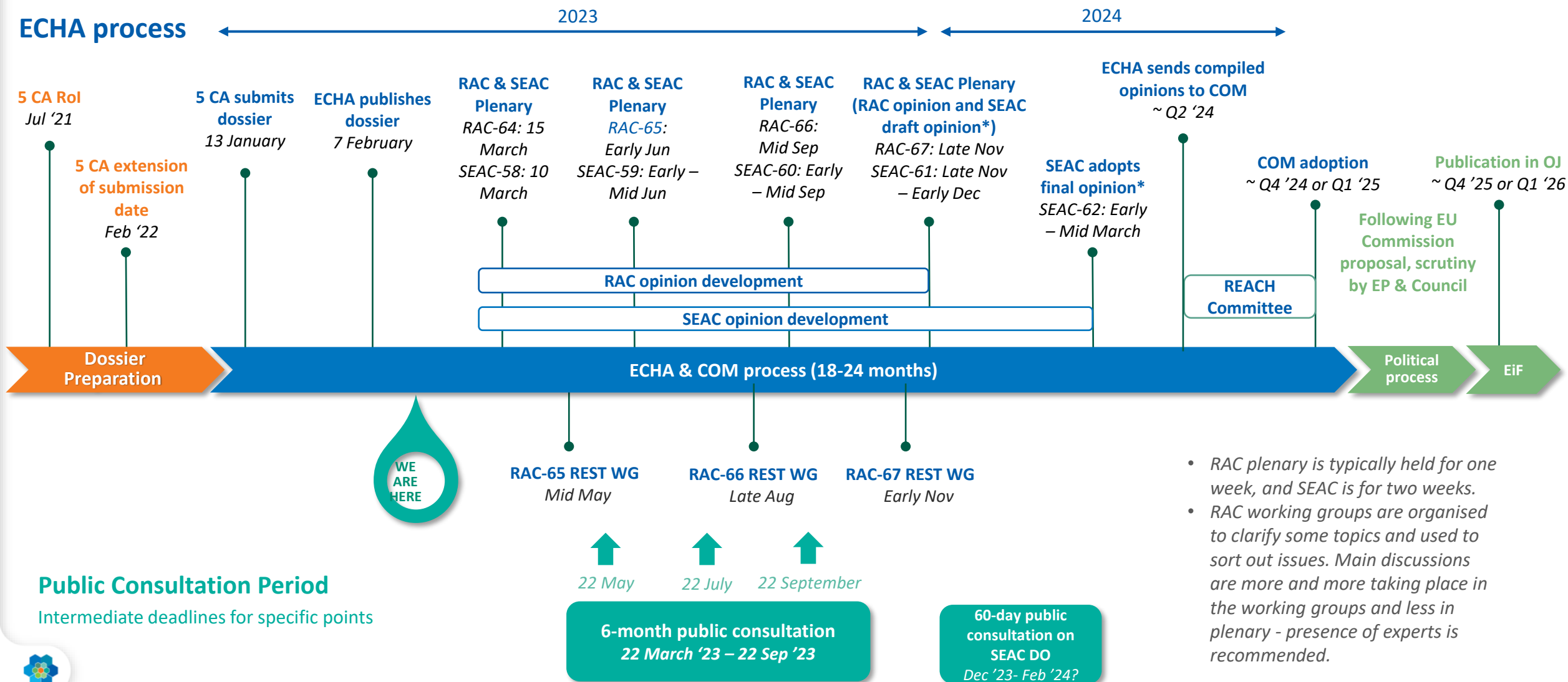
The proposal of the dossier submitters will ban an unprecedented number of PFAS uses

We have compared the proposal with a study done on the uses of PFAS and only 3% of those uses will be covered by the derogations

Impact: Glüge report and the derogations proposed in the U-PFAS Restriction proposal



The restriction proposal – indicative timeline



- RAC plenary is typically held for one week, and SEAC is for two weeks.
- RAC working groups are organised to clarify some topics and used to sort out issues. Main discussions are more and more taking place in the working groups and less in plenary - presence of experts is recommended.

* Assuming the earliest possible timeline.

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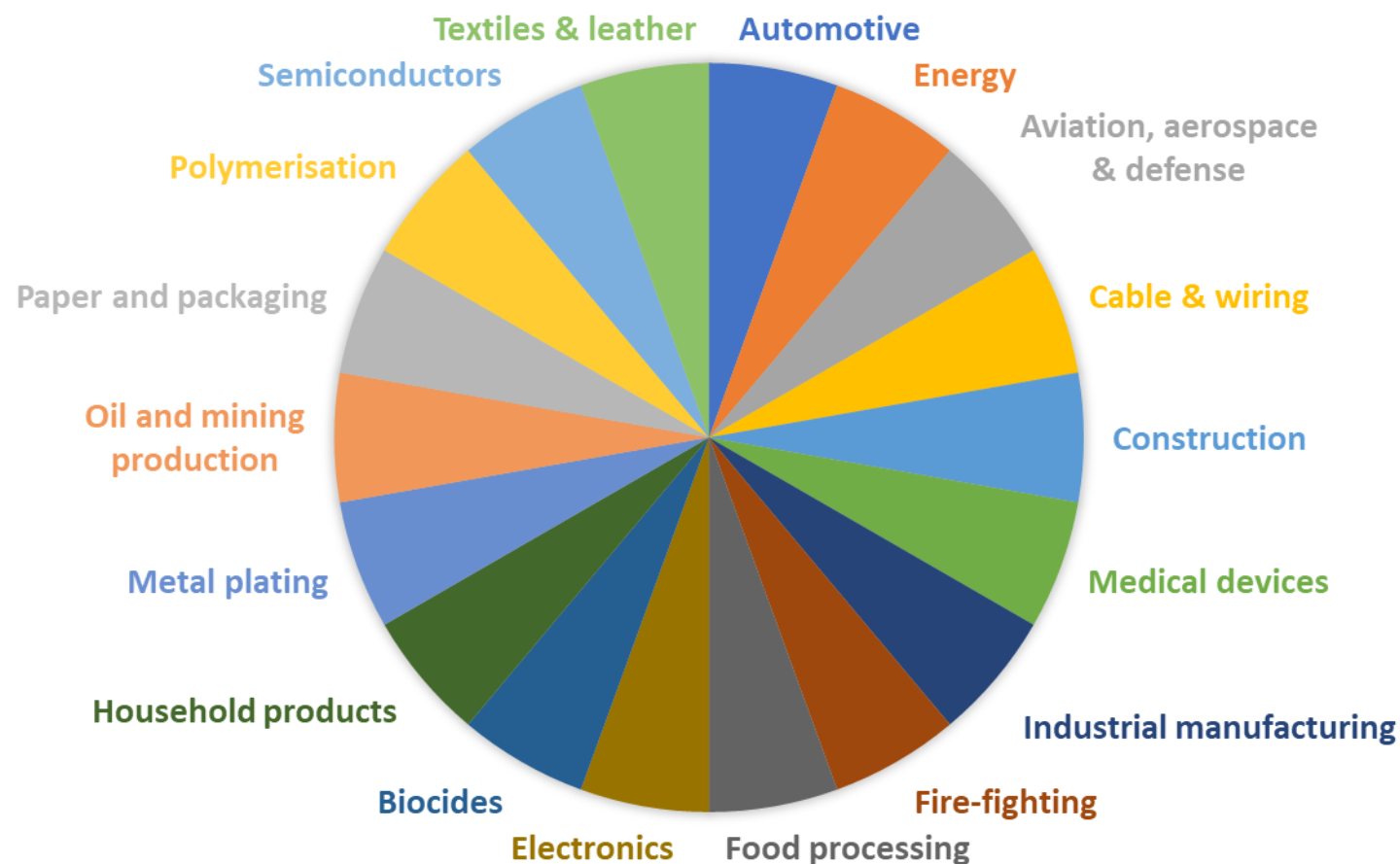
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FPP4EU covers a complex sector

We are dealing with hundreds of substances with diverging properties, used in many applications across an extended value chain.

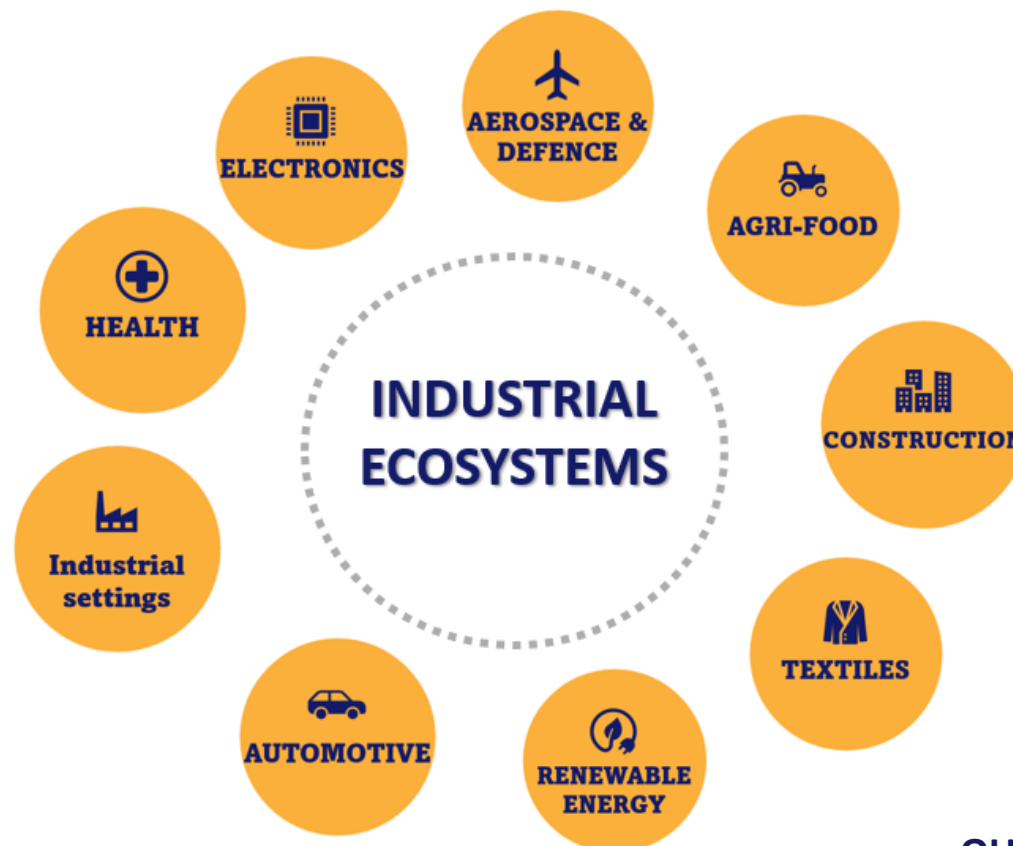


Collaboration Platform: membership (members and observers)

Collaboration Platform



101 Members including AFEMs
10 countries
Biggest representation in BE, DE, FR



**OUR DOWNSTREAM USERS
COVER THE MAJORITY OF
INDUSTRIAL ECOSYSTEMS**



- ✓ We organise meetings to discuss the potential impact of the restriction on different sectors, in compliance with competition law;
- ✓ We organise workshops where regulators are invited to explain the proposal and its potential consequences for the industry;
- ✓ We exchange relevant information focused on the U-PFAS restriction including the understanding the restriction process and the parties' proposals;



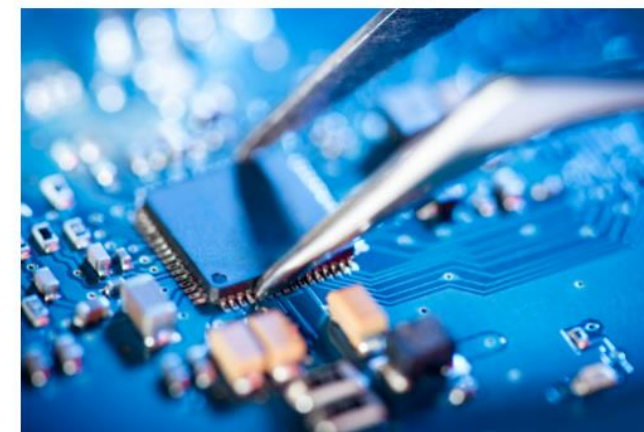
- ✓ We collect examples of PFAS used throughout different value chains in the EU – Case studies;
- ✓ We only work in non-exhaustive specific example lists' form; never claiming that no alternative exists and never favouring one substance over another!
- ✓ We aim to open the doors for individual sectors to defend their own cases;



Application

Electronics

During the last three decades, electronic devices have emerged as one of the most important parts of everyday life. They have become essential for communication, work, transportation and also in the medical sector. Already existing digitalisation trends have now been accelerated worldwide by the COVID-19 pandemic and new technologies such as AI and 5G promise to push this transformation even further. From enabling smartphones to be smaller to increasing transmission speeds and the lifespan of the components used, PFAS are essential in many current and future applications in the electronics industry.



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Call for action: we invite you to...

Join our Collaboration Platform!



Participation is free of charge!



Call for action: we invite you to...

Analyse

- where the restriction may have an impact (incl. equipment used onsite)
- current emission control measures

Collect data on

- (non-)availability of alternatives to PFAS
- realistic emission control measures

Feed data into public consultations on

- (non-)availability of alternatives
- cost impact*
- initiatives to reduce emissions

Contact us

- on the lengthy and complex process
- on the complex PFAS file

*** Cost impact typically includes**

- producer surplus losses
- employment losses
- consumer surplus losses
- welfare losses



THANK YOU !

For any questions please contact:

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