

Background:

Currently, the European Commission is working on a restriction dossier for perfluoroalkylated substances (PFAS) under the REACH regulation. On February 7, 2023 the European Chemicals Agency (ECHA) published in advance a restriction proposal. In accordance with the annex XVII of the REACH regulation, the potential future restriction would concern the manufacturing, distribution as well as use of PFAS in the European market.

Current status:

In the present restriction proposal, PFAS are defined as material which contains at least one completely fluorinated methyl or methylene carbon atom (without linked H/Cl/Br/I. This concerns about 10,000 different PFAS.

The restriction proposal includes two different options:

Option 1 (RO1): a complete restriction of all PFAS without exceptions

Option 2 (RO2): a restriction with application-specific largely time-limited exceptions.

The exceptions in RO2 all concern not industrial applications such as plant protection products or biocidal products.

All applications which are not covered by an exception would be affected by a direct restriction of all PFAS after a transition period of 18 months (time range approx. 2026/2027). In conclusion, both options in the long term aim at a complete restriction of the manufacturing, import and use of all PFAS in the European Economic Area (EEA).

Affected Products

Materials containing PFAS are mainly needed in areas of application of coupling technology where extreme conditions prevail. This specifically concerns all applications with high or low temperatures, high frictional resistances, aggressive/corrosive/toxic/chemical bonds or a combination of those. It is above all the sealing material FKM and FFKM which we use in the tempering technology which would be affected.

Alternatives

Looking for possible alternatives is currently difficult. When assessing these alternatives, we thoroughly have to check whether for the application affected by the regulation there actually are suitable, equivalent substitutes. In this case, apart from existing technical regulations (e.g. laws or standards) and the technological degree of maturity it is above all the safety-related issues and the lifetime which need to be considered. For most applications in the industrial area, there are currently no equivalent alternatives to the high-quality PFAS materials available.

Should we receive new information, we will update our statement and keep you posted.

Please do not hesitate to contact us in case of questions.

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