

Background

The competent authorities for REACH of 5 countries, namely the Netherlands, Germany, Denmark, Sweden and Norway are currently preparing an analysis of EU REACH restriction options for PFAS substances (per- and polyfluoroalkyl substances) as a group.

As part of this work, they have published a call for evidence questionnaire (open until 31 July) to generate data and knowledge on PFAS and their uses in order to decide on which substances and uses should be covered as part of a restriction proposal. The call for evidence further aims at gathering information about whether chemical alternatives or technical replacements exist for PFAS, as well as any voluntary measures or substitution processes that may be ongoing. Following this exercise, it is expected that a REACH Annex XV Restriction dossier will be submitted in 2021.

The country authorities who will be reviewing submissions will be doing so through the lens of the EU Green Deal – reducing waste, reducing carbon emissions, etc.

Where can you find the call for evidence?

The call for evidence is web-based and can be accessed [here](#). A pdf version for information purposes can be found [here](#). An information document accompanying the questionnaire can be found [here](#).

Deadline for Submission

31 July 2020

The call for evidence

The call for evidence contains questions you are obliged to answer related to your name, organisation, confidentiality, and your role as regards PFAS. After this you have the possibility to fast-forward through blocks of questions depending on the type of information or data you wish to submit.

In answering to the call for evidence you may wish to use facts and figures from the Factsheet document we sent to you, and you may also find useful a [socio-economic](#) report compiled for the Fluoropolymers Product Group.

V. Questions – Section A – PFAS and PFAS-containing mixtures and articles – **What are you**

Here you can define your role as regards PFAS and/or PFAS containing mixtures e.g. importer, distributor, downstream user etc.

V. Questions – Section A – PFAS and PFAS-containing mixtures and articles – **Substance identity and quantities**

This section invites you to submit information on substance identity and quantities of a substance and any information on non-intentionally added substances. If you have any information on workers involved in handling substances, and number of manufacturing sites/use sites, this can also be submitted.

V. Questions – Section A – PFAS and PFAS-containing mixtures and articles – **Information on hazards**

This section asks if you have information on hazards, in particular whether or not you consider your PFAS/and or PFAS present in your mixture or article to be persistent. Please consult Safety Data Sheets (for example, Sections 2, 8, 11 and 12) for hazard information of the PFAS you are using.

V. Questions – Section A – PFAS and PFAS-containing mixtures and articles – Information on uses

Here you can tick boxes indicating your area of specific end use of PFAS e.g. textiles, cosmetics, food contact, construction products, medical devices, etc. Information on estimated annual quantities is also requested. This section addresses questions such as specific function, use, and particular type of substance which is used.

V. Questions – Section A – PFAS and PFAS-containing mixtures and articles – Specific uses

This section focuses on questions related to the specific uses of PFAS. Answer to the section relevant to your use. This is one of the most critical areas of the questionnaire as the information provided in this section will help reviewers to understand the true breadth and depth of critical uses throughout society.

V. Questions – Section A – PFAS and PFAS-containing mixtures and articles – Functionality and final mixtures/article

Provide information on the technical function of the PFAS you use. This is an opportunity to show what specifications are required for performing the tasks for which they are used, why the specific fluoropolymers you use are critical for your articles/mixtures and the function they fulfil. For example, what are their unique properties that make their use indispensable and are there industry codes / standards or performance specifications that need to be met.

V. Questions – Section A – PFAS and PFAS-containing mixtures and articles – Information on releases and exposure

This section requests information on any releases to the environment during the manufacturing process, the application of the substance and exposure to workers. What measures are you taking to reduce any emissions and exposure?

V. Questions – Section A – PFAS and PFAS-containing mixtures and articles information on alternatives & V. Questions – Section B – Alternatives to PFAS

Information on alternatives (by PFAS sector). Are you aware of, or are you using, an alternative to a fluoropolymer substance that has no environmental emissions? Do you have any other information about alternatives such as the technical and/or economic implications, health and environment hazards and the challenges of moving to an alternative.

In this section, we recommend highlighting how crucial fluoropolymers are to your sector and why it would be difficult to achieve the same benefits through alternatives. In many cases, no alternatives meet the technical specifications required for your or your members' uses.

VI. Additional Information

To accompany your submission to the questionnaire you have the possibility to provide supplementary information, via attachment. We recommend that if you have evidence showing the importance of fluoropolymers to your industry, you attach it to your submission. That can include socio-economic evidence, evidence of why fluoropolymers are used in your sector e.g. their technical profile.

Further questions?

Please contact Laurence.Vermeersch@plasticseurope.org and Nicolas.Robin@plasticseurope.org at the FPG secretariat with a copy to our colleagues at BCW Brussels fluoropolymers@bcw-global.com who are supporting us in our work.