

# Cross-Sectoral Information Session on the Cascade of REACH Restrictions in Fluorochemistry – Preserving Essential Industrial Value Chains

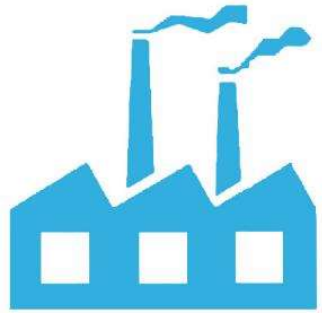
*Practical advice for consultation contributions...*

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Gesamtverband textil+mode

20.07.2020

# The German Textile and Fashion Industry – an overview textil+mode

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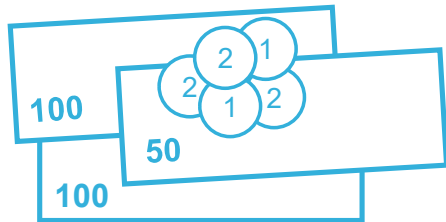
**1,400**

Companies,  
predominantly SME



**135,000**

Employees in Germany



**32 bn €**

Turnover,  
60 % textile, 40 % clothing



**16**

Textile research institutes

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**Fluorochemistry = Innovation - Environment - Health - Safety - Sustainability - Economic viability and competitiveness**

**Without your products this will not work in future?! Take part in the consultation.**

**A few practical tips:**

- **Why** is it important to participate in the consultation?
- **Who** should participate (your position in the supply chain)?
- **What** are the important points (in the context of your position in the supply chain)?
- **Where** can you find assistance?
- **We give you an example (Best Practice)...**

see also:  
<https://echa.europa.eu/de/-/public-consultation-on-the-proposed-restriction-of-pfhxa>

# 1. Check – How are you affected



ANNEX XV RESTRICTION REPORT

PROPOSAL FOR A RESTRICTION

SUBSTANCE NAMES:

Undecafluorohexanoic acid (PFHxA), its salts and related substances

PFHxA dossier (extract – relevance for Textile sector):

Paragraph 9 establishes **derogations for specific textile applications (NOT limited in time)**

They concern:

- **Specific personal protective equipment** to protect users from risks according to Regulation (EU) 2016/425 Annex I, **risk category III (a), (c), (d), (e), (f)**;
  - (a) substances and mixtures hazardous to health
  - (c) harmful biological agents
  - (d) ionising radiation
  - (e) high temperature environments with effects comparable to those of an air temperature of at least 100 °C
  - (f) low temperature environments with effects comparable to those of an air temperature of 50 °C or less
- **Impregnating agent** for reimpregnation **of the above mentioned objects**
- Specific **medical textiles (non-woven)**

Specific reporting obligations are included in **paragraph 10** of the limitation for economic operators making **use of these exemptions**.

# 1. Check – How are you affected

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Starting  
point

- Consultation PFHxA
- PFAS survey COM

## **No exceptions are provided for:**

- all types of outdoor clothing
- Home textiles (tablecloth, stain protection)
- Home textiles (upholstery, stain protection)
- Automotive (seats/coverings, stain protection)
- Technical textiles (gas and oil filtration)
- Automotive (engine hoods, diesel rejection)
- Textiles in architecture
- Personal protective equipment not mentioned above
- Medical textiles (not made of non-woven fabric)

# 1. Check – How are you affected

Starting point

- How are you affected?



Picture source: trafego.aereo blog, Instagram

# What information is needed?

**Action 1**

- What information is requested by ECHA?

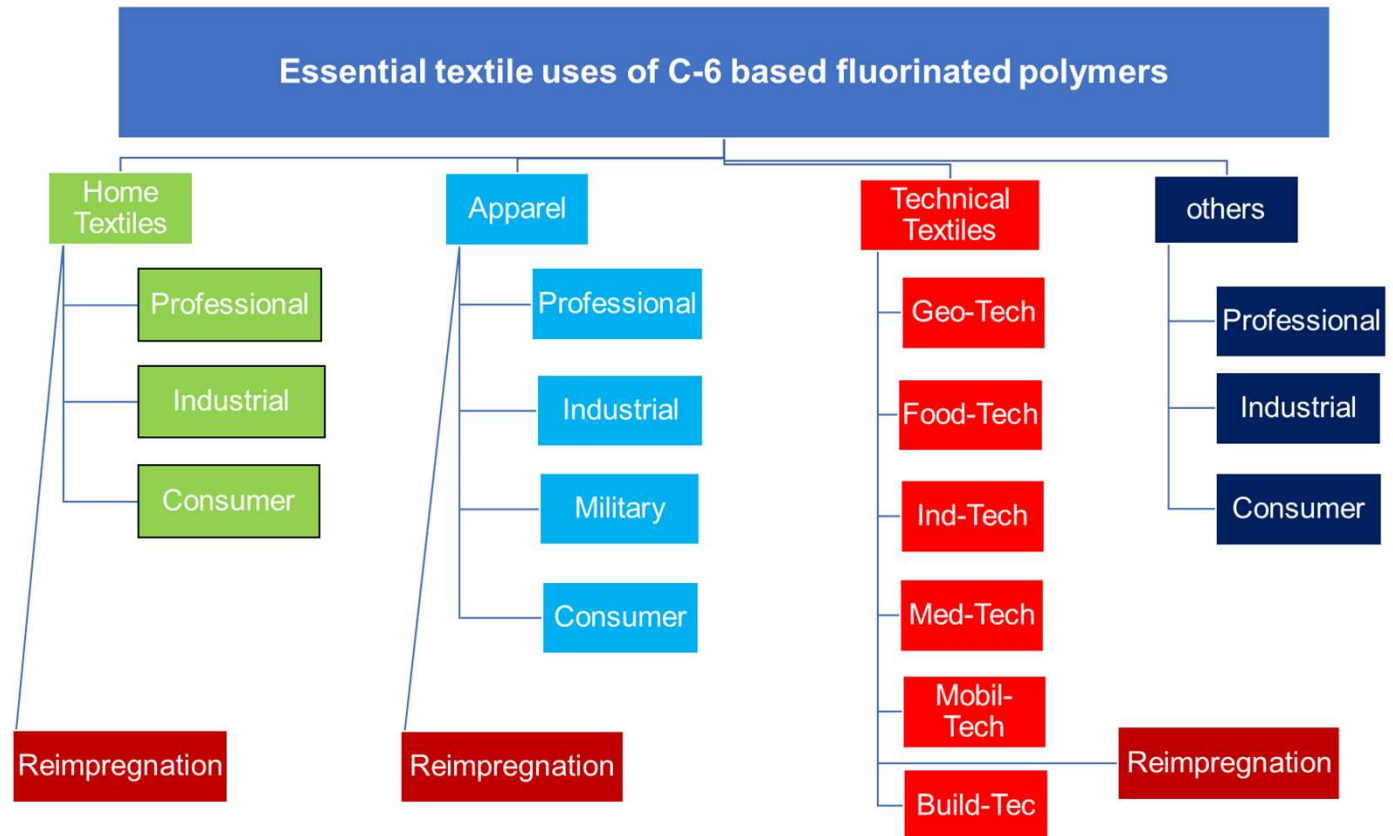
see also:  
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Q	Questions raised by ECHA
<b>1</b>	<b>Additional uses (production and imports/exports) above the proposed concentration limit...</b>
2	Additional data on emissions of PFHxA from polymers...
<b>3</b>	<b>Textile sector: Data on share of imported clothing (outdoor clothing and workwear)...</b>
4	Coatings- Construction materials (data on tonnages)
5	Fire-fighting foams (all relevant sectors, including defense sector)
6	Other uses: e.g. cleaning, waterproofing agents, polishing products, including uses in consumer products
<b>7</b>	<b>Alternative fluorine-free substances or technologies for uses of PFHxA, its salts and related substances...</b>
<b>8</b>	<b>Uses where substitution impossible (use, main obstacles to substitution, consequences and costs)</b>
<b>9</b>	<b>Uses where substitution is or is not possible now - but is expected to become possible short to medium-term...</b>
<b>10</b>	<b>Uses where substitution would be possible but is expected to lead to a lower quality of products or lower performance (use, impacts on quality/performance of products, economic impacts...)</b>
11	PFAS-based alternatives (e.g. 4:2 FTOH, etc.) or other fluorinated substances (e.g. perfluoroalkylether carboxylic acids)..
12	Costs: Correct assumptions and costs used? If not - additional data and evidence + costs for annual reporting (exemptions)..
<b>13</b>	<b>Analytical methods: awareness and devolpments</b>

## 2. Form clusters of applications for essential uses

### Action 2

- Clustering of product types and application

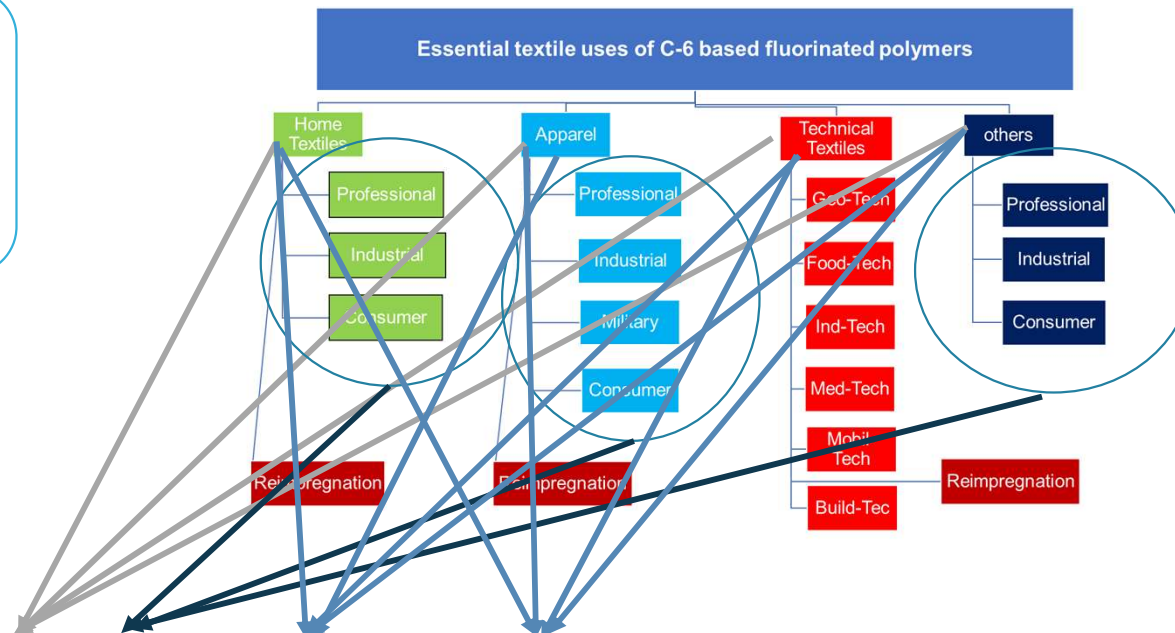




### 3. Structure of incoming information in a „database“

**Action 3**

- Bring it in a unique Database format



**T+M/TEGEWA  
DATABASE -  
STRUCTURE**

Category	Use	Subcategory - uses with examples included	Technical function (e.g. oil- repellence, water-repellence, flame retardancy, stain-resistance, soil protection)	Comment	Standards / Approvals/Test methods
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### 3. Structure of incoming information in a „database“

**Action 3**

- Bring it in a unique Database format

- Total expenditure (monetary, organizational) incurred by the enterprise to convert from C8 to C6 (REACH Annex XVII entry 68)
- Why is C6 currently the only technically feasible alternative to C8
- Why fluoro-free alternatives do not work for high performance critical applications – Documentation of test results and investigations, costs etc.
- Cost-benefit analyses in connection with requirements on durability and serviceability and the fulfilment of legal requirements - especially in compatibility with the goals of the Green Deal - Circular Economy
- Technical processes to avoid emissions during production (water, soil, air), best practice solutions, BAT etc. but also existing legal requirements, investments in environment
- Concepts for the implementation of end-of-life solutions (e.g. take-back concepts, recycling concepts) and associated investment costs
- Importance of autonomy and competitiveness of the German industry

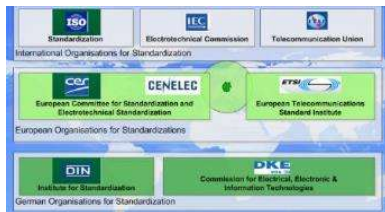
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### 3. Structure of incoming information in a „database“

Action  
3

- Bring it in a unique Database format

- Technical standards play a special role in commercial law because courts can use them to help determine whether a product is defective or not
- Because courts deem standards to be acknowledged rules of technology, they often assume a product has been manufactured with due care if it complies with the relevant standards
- Furthermore, standards also concern individual customer requirements (e.g. factory standards), which become the subject of contractual agreement - if a product does not fulfil the promised properties, a defect exists
- Complex products consist of a large number of components, which in turn have to comply with individual standard requirements - changes to just one component can lead to a complete loss of function of the end product and/or to a necessary re-certification of the complex final product - this is associated with high costs and expenses and takes time



Category	Use	Subcategory - uses with examples included	Technical function (e.g. oil- repellence, water-repellence, flame retardancy, stain-resistance, soil protection)	Comment	Standards / Approvals/Test methods

# t+m/TEGEWA „Database“



Result

t+m/TEGEWA  
Database  
ECHA  
(1.consultation,  
May 2020)

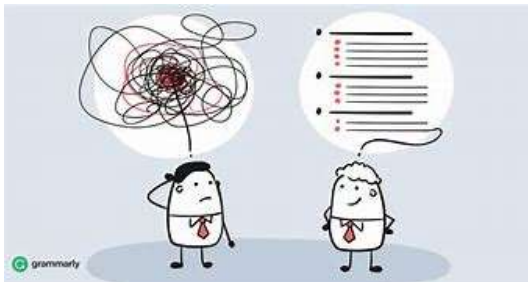
Category	Use	Subcategory-uses with examples included	Technical function (e.g. oil- repellence, water- repellence, flame retardancy, stain- resistance, soil protection)	Comment	Standards / Approvals/Test methods
Home Textiles	Professional	Carpets and rugs for special applications (marine, public buildings, automotive, railway etc.)	Water repellence, Oil repellence, Abrasion protection Durability, resistance to soiling and oil and water repellency, UV resistance.	A distinction may have to be made between applications in the automotive sector, in the equipment of ships, public buildings etc., where high demands must be made on durability, resistance to soiling and oil and water repellency.	AATCC TM 22-water repellency: spray test AATCC TM 35- water resistance: rain test AATCC TM 42-water resistance: impact penetration test AATCC TM 127-water resistance: hydrostatic pressure test ISO 9865-water repellency: Bundesmann rain shower test AATCC TM 118-oil repellency: hydrocarbon resistance test AATCC TM 130-soil release: oily stain release method
Home Textiles	Professional	Curtains for special applications (marine, public buildings, automotive, railways)	Water repellence, Oil repellence, Abrasion protection Durability, resistance to soiling and oil and water repellency, UV resistance.	A distinction have to be made between „normal applications“ and „higher requirements due to legislative/regulative regulations“ (e.g. Building regulations, automotive, Railway, Marine e.g.) demands must be made on durability, resistance to soiling and oil and water repellency, fire resistance and further technical aspects.	AATCC TM 22-water repellency: spray test AATCC TM 35- water resistance: rain test AATCC TM 42-water resistance: impact penetration test AATCC TM 127-water resistance: hydrostatic pressure test ISO 9865-water repellency: Bundesmann rain shower test AATCC TM 118-oil repellency: hydrocarbon resistance test AATCC TM 130-soil release: oily stain release method
Home Textiles	Consumer use with highest Standards to safety, durability and sustainable aspects (long life)	Carpets and rugs for special outdoor applications	Water repellence, Oil repellence, Abrasion protection Durability, resistance to soiling and oil and water repellency, UV resistance.	Outdoor applications have to meet requirements for long-life and high resistance to wear/humidity. Not least from a sustainability perspective, important characteristics such as longevity and the fulfillment of customer requirements cannot be fulfilled in any other way due to operating standards. The alternative would be more short-lived products that run counter to the approach of the circular economy (high volume of waste).	AATCC TM 22-water repellency: spray test AATCC TM 35- water resistance: rain test AATCC TM 42-water resistance: impact penetration test AATCC TM 127-water resistance: hydrostatic pressure test ISO 9865-water repellency: Bundesmann rain shower test AATCC TM 118-oil repellency: hydrocarbon resistance test AATCC TM 130-soil release: oily stain release method
Home Textiles	Professional	Upholstery (e.g. fabrics for soft-furnishings, inc. large furniture items) for outdoor applications, i.e. in hotels, amusement parks	Water repellence, Oil repellence, Abrasion protection Durability Stain resistance Reaction to fire behaviour	Fat and oil repellence needed to comply to current testing standards. Also to reduce the threat of biological contamination due to growing biological mass on non-clean surfaces, which can lead to infections of end users especially person with health issues and small babies	AATCC TM 22-water repellency: spray test AATCC TM 35- water resistance: rain test AATCC TM 42-water resistance: impact penetration test AATCC TM 127-water resistance: hydrostatic pressure test ISO 9865-water repellency: Bundesmann rain shower test AATCC TM 118-oil repellency: hydrocarbon resistance test AATCC TM 130-soil release: oily stain release method
Home Textiles	Consumer use with highest Standards to safety, durability and sustainable aspects (long life)	Upholstery (e.g. fabrics for soft-furnishings, inc. large furniture items) for outdoor applications, i.e. gardening	Water repellence, Oil repellence, Abrasion protection Durability Stain resistance Reaction to fire behaviour	Fat and oil repellence needed to comply to current testing standards. Also to reduce the threat of biological contamination due to growing biological mass on non-clean surfaces, which can lead to infections of end users especially person with health issues and small babies. Outdoor applications have to meet requirements for long-life and high resistance to water/humidity as well for stain resistance. Not least from a sustainability perspective, important characteristics such as longevity and the fulfillment of customer requirements cannot be fulfilled in any other way due to operating standards. The alternative would be more short-lived products that run counter to the approach of the circular economy (high volume of waste).	AATCC TM 22-water repellency: spray test AATCC TM 35- water resistance: rain test AATCC TM 42-water resistance: impact penetration test AATCC TM 127-water resistance: hydrostatic pressure test ISO 9865-water repellency: Bundesmann rain shower test AATCC TM 118-oil repellency: hydrocarbon resistance test AATCC TM 130-soil release: oily stain release method

# From „national“ to European level

## Action 4

t+m/TEGEWA  
Database  
becomes  
EURATEX  
Database  
Ongoing

## Are all aspects included?



Database – Development of a uniform query template for companies

Further development of the “database”  
EURATEX

a) Database on PFHxA or PFAS (sampling of all information)

b) Product information only - essential use –

[standards/approvals/certification/technical delivery conditions](#)

c) Using of sources and involving experts from standardisation:

- regarding product related standards - e.g. PPE Standardization CEN TC 248 / Standards for medical devices/Technical standards / “Werkstandards“
- regarding testing standards
- regarding experts from companies („supply chain standards“)

c) Life cycle information / technical aspects:

- Do take-back models already exist?
- Technical solutions to reduce emissions during production?
- What contribution can manufacturers make to traceability within the framework of producer responsibility?

# Further development – Database – Additional aspects textil+mode

## Action 4

EURATEX/t+m  
questionnaire  
(ongoing)

Category	Use	Subcategory-uses with examples included	Technical function (e.g. oil- repellence, water- repellence, flame retardancy, stain- resistance, soil protection)	Comment	Standards / Approvals/Test methods	What PFAS - substances or PFAS-goup is used?	What is the minimum concentration of PFAS that is necessary to maintain function (to be in accordance with standards or customer need)?	Did you try to substitute PFAS? If yes - can you explain shortly your experience?	Do you have data or other experiences for reduced service life (alternatives)?	Please explain shortly the technicque for the waste water management (only regarding to PFAS) regarding surveillance, national regulations etc.	Please explain shortly the technicque for the waste water management (only regarding to PFAS) regarding surveillance, national regulations etc.
..see Masterlist	..see Masterlist	..see Masterlist	..see Masterlist	..see Masterlist	..see Masterlist						

# Summary and Conclusions

Examine the impact of a possible ban of PFHxA/PFAS for essential uses in your position as: Manufacturer, User, Supplier, Importer – get in contact with your supply chain	✓
Take part in the consultation PFHxA (deadline: 25.09.2020) <a href="https://echa.europa.eu/de/restrictions-under-consideration/-/substance-rev/25419/term">https://echa.europa.eu/de/restrictions-under-consideration/-/substance-rev/25419/term</a>	✓
Take part in the consultation for PFAS (deadline 31.07.2020): <a href="https://www.reach-clp-biozid-helpdesk.de/SharedDocs/Meldungen/DE/REACH/2020-05-08-RMOA-PFAS.html">https://www.reach-clp-biozid-helpdesk.de/SharedDocs/Meldungen/DE/REACH/2020-05-08-RMOA-PFAS.html</a>	
Explain the need for derogation e.g.: <ul style="list-style-type: none"><li>▪ Product type and relevance – also related to the importance of autonomy and competitiveness of the German and EU-industry</li><li>▪ Why is C6 currently the only technically feasible alternative to C8</li><li>▪ Why fluoro-free alternatives do not work for high performance critical applications</li><li>▪ Cost-benefit analyses in connection with requirements on durability and serviceability and the fulfilment of legal requirements - especially in compatibility with the goals of the Green Deal - Circular Economy</li><li>▪ Concepts for the implementation of end-of-life solutions (e.g. take-back concepts, recycling concepts) and associated investment costs; importance of autonomy and competitiveness of the German industry</li><li>▪ Technical processes to avoid emissions during production (water, soil, air), best practice solutions, BAT e but also existing legal requirements, investments in environmental techniques</li></ul>	✓



# Thank you for your attention

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