



WELCOME! The webinar will begin shortly.

A recording of the webinar and the slides will be available afterwards.



**ALL YOU NEED TO KNOW ABOUT THE
PFAS RESTRICTION CONSULTATION**



ALL YOU NEED TO KNOW ABOUT THE PFAS RESTRICTION CONSULTATION



TODAY

- **Introduction**
 - **The restriction proposal**
 - **How to respond to the public consultation**
 - **Questions** - use the Q&A function!
 - **ChemSec resources related to PFAS**
-
- ❑ Slides and recording will be available afterwards
 - ❑ A written guide on how to respond to the consultation will be sent out afterwards



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Broad PFAS Restriction Proposal

Jenny Ivarsson
Swedish Chemicals Agency

ChemSec webinar 31 May 2023



Preparation

May – July 2020
Call for evidence

July 2021 – Oct 2021
2nd stakeholder consultation

Oct 2021 – Jan 2023
Drafting of proposal

Stakeholder interviews, literature search, meetings



Jan 2020
First meeting

13 January 2023
Submission
of proposal

7 February 2023
Publication of
proposal

The proposal - chemical definition

Column 1

Per- and polyfluoroalkyl substances (PFASs) defined as:

Any substance that contains at least one fully fluorinated methyl (CF_3 -) or methylene ($-\text{CF}_2-$) carbon atom (without any H/Cl/Br/I attached to it).

A substance that only contains the following structural elements is excluded from the scope of the restriction:

$\text{CF}_3\text{-X}$ or $\text{X-CF}_2\text{-X}'$,

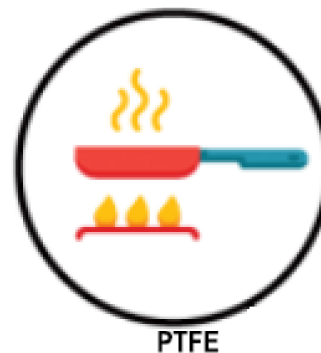
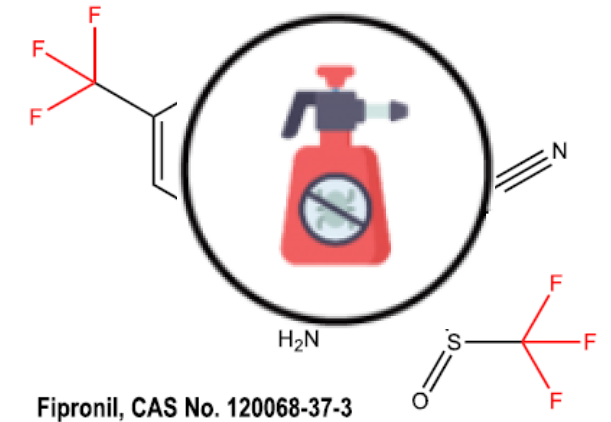
where $\text{X} = -\text{OR}$ or $-\text{NRR}'$ and

$\text{X}' =$ methyl ($-\text{CH}_3$), methylene ($-\text{CH}_2-$), an aromatic group, a carbonyl group ($-\text{C}(\text{O})-$), $-\text{OR}''$, $-\text{SR}''$ or $-\text{NR}''\text{R}'''$;

and where $\text{R/R}'/\text{R}''/\text{R}'''$ is a hydrogen ($-\text{H}$), methyl ($-\text{CH}_3$), methylene ($-\text{CH}_2-$), an aromatic group or a carbonyl group ($-\text{C}(\text{O})-$).

= OECD PFAS definition 2021

Over 10 000 substances covered. Some examples:



The proposal - chemical definition

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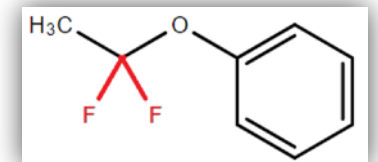
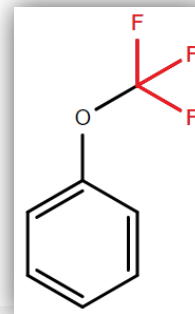
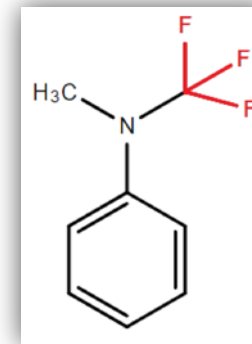
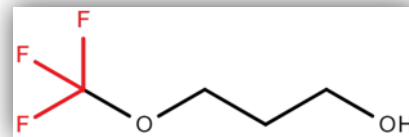
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A few specific types of PFASs can be completely degraded in the environment. These are therefore excluded from the scope:

$\text{CF}_3\text{-O-}$ / $\text{CF}_3\text{-N}<$

$-\text{CF}_2\text{-O-}$ / $-\text{CF}_2\text{-N}<$

Examples:



Proposed restriction

Ban on manufacture, use and placing on the market



- As substances on their own
 - As a constituent in
 - another substance
 - a mixture
 - an article
- } ≥ 25 ppb for any PFASs
} ≥ 250 ppb for sum of PFASs
} ≥ 50 ppm* for PFASs

* If total fluorine exceeds 50 mg F/kg the manufacturer, importer or downstream user shall upon request provide to the enforcement authorities a proof for the fluorine measured as content of either PFASs or non-PFASs.

Restriction Options assessed (RO)

RO1

Full ban of all uses

- Transition period: 18 months

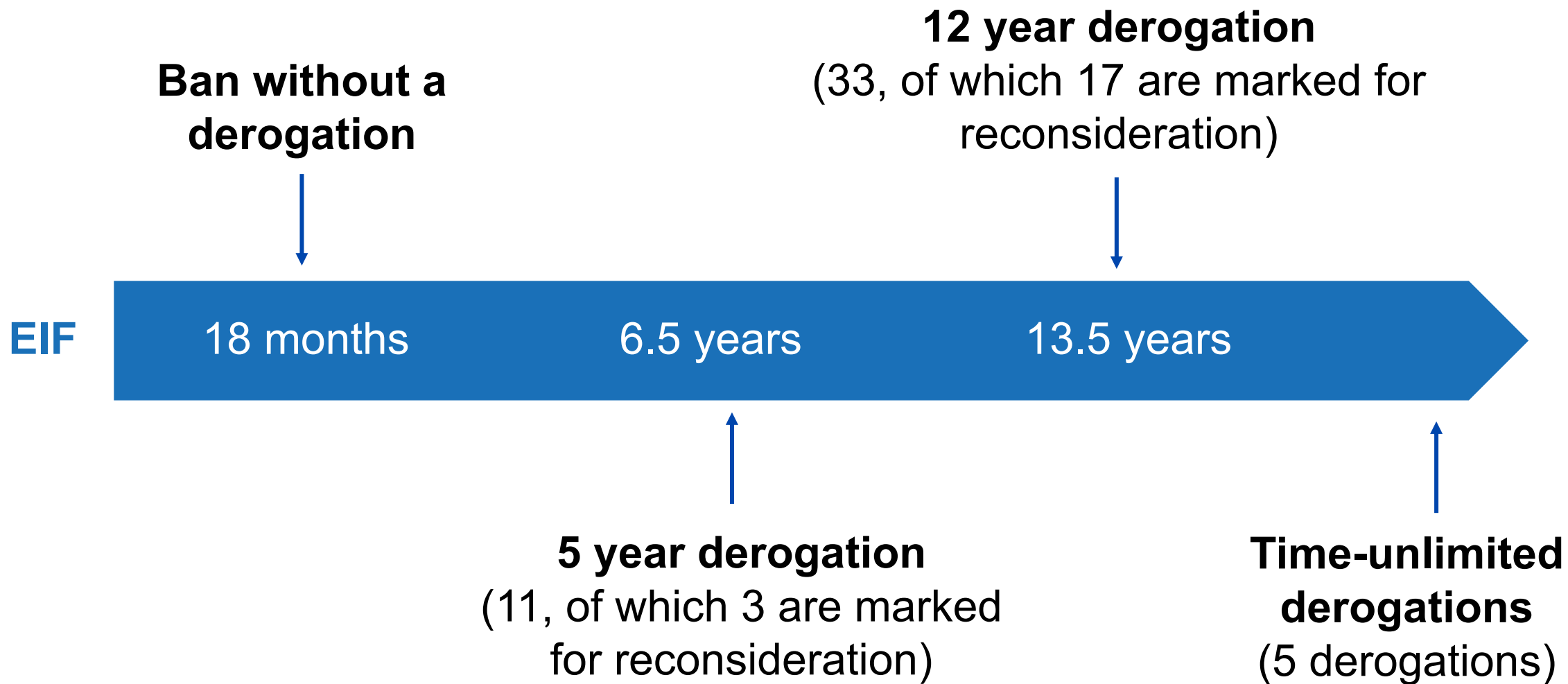
Restriction Options assessed (RO)

RO2

Ban with use-specific derogations

- Transition period: 18 months
- Duration of derogation:
 - 5-years
 - 12-years
- Time-unlimited derogations (specifically justified)
 - Active substances in biocidal products, plant protection products and pharmaceuticals
 - Refrigerants in HVACR-equipment in buildings where national safety standards and building codes prohibit the use of alternatives
 - Calibration of measurement instruments and as analytical reference materials
- Mandatory reporting in relation to majority of derogations
- Requirement for a site-specific management plan

Phase-out timelines



Proposed restriction conditions - derogations

Two standard derogation timeframes chosen

Examples:

**Food contact materials
for industrial food and feed
production**

**Implantable medical
devices**

Alternatives under development
but not available at entry into
force

Identification, development
and certification of
alternatives needed

5 years

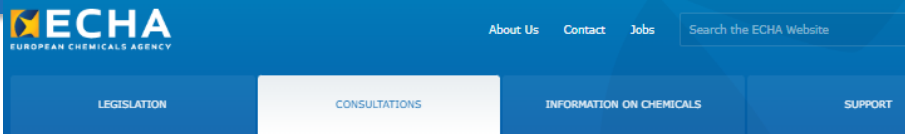
12 years

Restriction process – next steps

Now you can contribute with information to the proposal for a broad PFAS ban in EU.

- Public Consultation, 22 March – 25 September 2023
- ECHA opinion making
 - Committee for Risk Assessment (RAC) Committee for Socio-Economic Analysis (SEAC)
- Decision by the Commission and the Member States, ca 2025/26

How to reply to the public consultation



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 do relevant consultations can be found by clicking on details. For consultations on conforming restriction proposals, two deadlines are given; comments submitted by the 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 a 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](#)

< [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	Give Comments
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

Submitted restrictions under consideration - ECHA (europa.eu)

How to reply to the public consultation

Annex XV report – Summary, proposed restriction pp. 4-8 (scope, derogations)

Annex A - Uses

Annex B - Hazard and risk

Annex C - Justification for action on a Union-wide basis

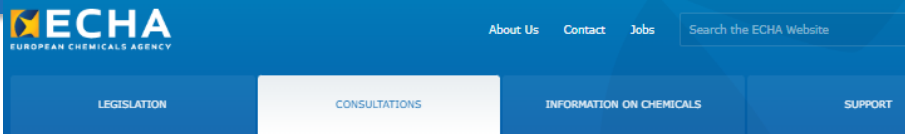
Annex D - Baseline

Annex E - Impact Assessment

Annex F - Assumptions, uncertainties and sensitivities

Annex G - Stakeholder information

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How to reply to the public consultation

- Changes are made based on information submitted to the Public Consultation
- Substantiated scientific evidence is key:
 - Alternatives, impacts (costs and benefits), missed uses, tonnages and emissions, R&D efforts, etc.
 - If available, quantitative information is preferred
 - Joint submissions are strongly encouraged over individual submissions
- **Position papers and unsubstantiated claims are not useful**

How to reply to the public consultation

- Possible to provide both general comments answers to the specific questions
- Specific Information Requests
 - Sectors and (sub-)uses
 - Emissions in the end-of-life phase
 - Impacts on the recycling industry
 - Proposed derogations
 - Missing uses
 - Potential derogations marked for reconsideration
 - Degradation potential of specific PFAS sub-groups
 - Analytical methods
- Comments submitted as attachments
- The consultation webform allows you to submit confidential information

LET'S DIVE INTO THE QUESTIONS!

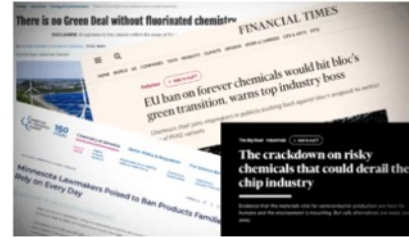
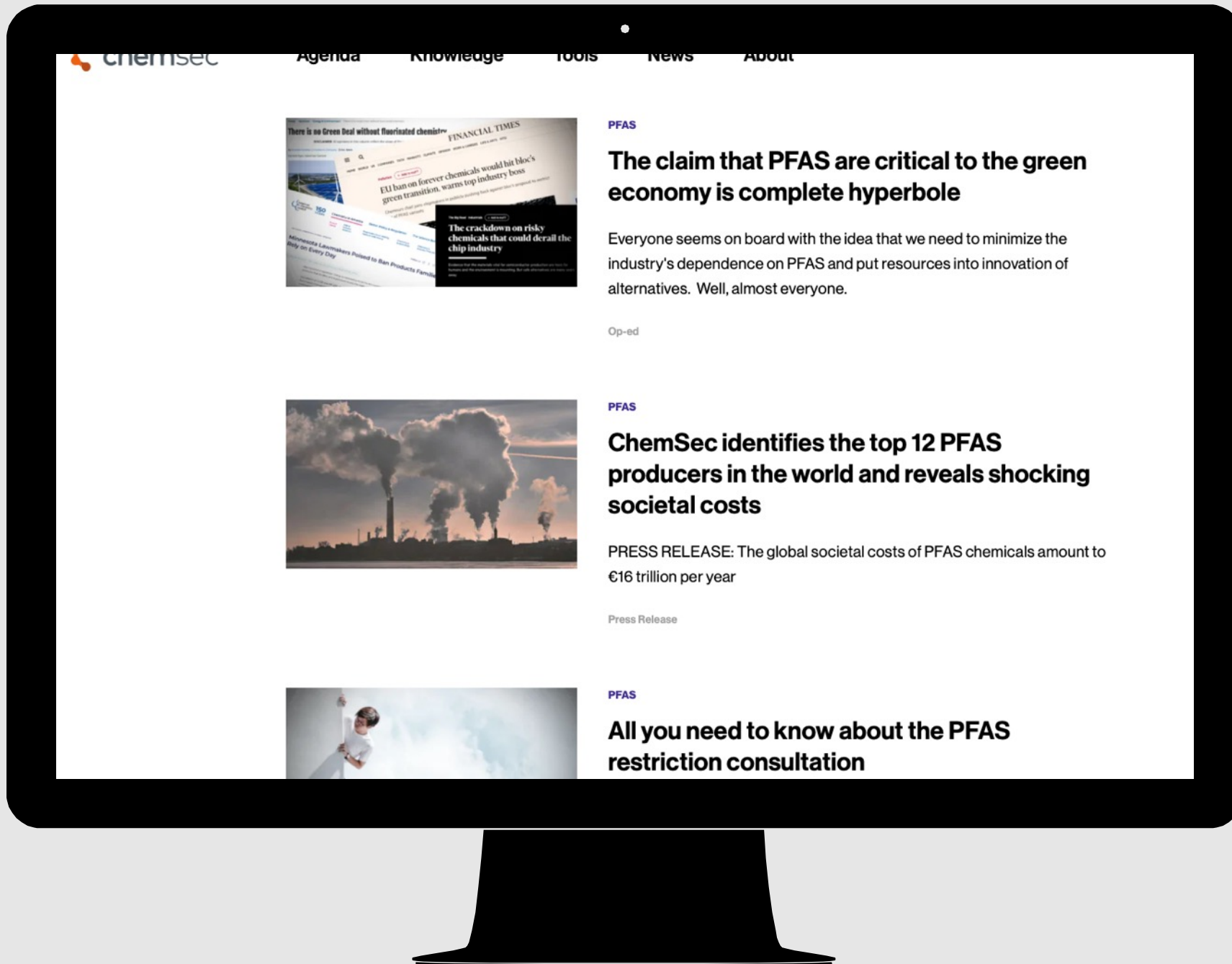




chemsec

INTERNATIONAL CHEMICAL SECRETARIAT





PFAS

The claim that PFAS are critical to the green economy is complete hyperbole

Everyone seems on board with the idea that we need to minimize the industry's dependence on PFAS and put resources into innovation of alternatives. Well, almost everyone.

Op-ed



PFAS

ChemSec identifies the top 12 PFAS producers in the world and reveals shocking societal costs

PRESS RELEASE: The global societal costs of PFAS chemicals amount to €16 trillion per year

Press Release



PFAS

All you need to know about the PFAS restriction consultation

Welcome to the

PFAS Guide

PFAS chemicals are used in many product categories, even where you least expect it. The PFAS Guide can alert you to products likely to contain these chemicals and give your company advice on how to phase them out.



Investigate



Phase out



Concern



Regulation



Sector



Are there PFAS chemicals in your



Investigate

This chapter will teach you about typical “red flags” indicating that PFAS could be in a product. You will also find suggestions on how to communicate about PFAS in the supply chain and what to do if you do not get the answers you need from your suppliers, or want to verify them.



Phase out

To phase out PFAS you need to find a way to achieve the same functionality without them. The most straightforward approach is to simply replace one chemical with a safer one. But this can be tricky. Other ways include changing materials, technologies or production processes.



Concern

PFAS continue to be used on a broad scale despite their adverse health effects, linking them to issues such as cancers and infertility. Since these “forever chemicals” do not degrade, they are now found all over the planet in our environment and in the blood of every single human being.



Regulation

It has taken some time, but regulation is now finally stepping up to address this vast and problematic family of chemicals. A comprehensive PFAS ban is expected in the European Union within the coming years and a range of regulatory actions are in the pipeline in other regions as well.



Sector

Many industries use PFAS in some way or another for a variety of functions and purposes. These uses can be hard to find at a first glance. In this part of the guide, we publish reports with information on PFAS use and substitution with relevance for specific industry sectors.



INFORMATION PART

- Typical PFAS uses, supply chain communication and chemical analysis
- Substitution as a phase-out method. Find, evaluate and compare alternatives
- What are the problems with PFAS? PFAS and human health
- Regulation in the EU and the US
- Links to sector-specific reports



DATABASE

- Incorporates information from scientific publications, reports and information from individual companies
- Links to the SIN List and Marketplace
- Links to reports on alternatives
- Let it be a growing source of information!
- pfasguide@chemsec.org

Possible PFAS hotspots

Based on your selection

698 results [Download Excel](#) [Share link](#) [Remember search](#)

Sector	Use/Product	Function	Material
Refrigerant systems	Mobile air conditioning	Refrigerants	-
Possible alternatives ⓘ			
CO2 refrigerant Propane		PFAS CAS numbers ⓘ	Additional information
		115-25-3 356-18-3 377-41-3 76-16-4	Overview of F-gases and alternatives
> Textile, apparel and upholstery	(Sailing) boat equipment - textiles for maritime applications	Water and oil repellence	Textile
> Healthcare	Plastic anesthetic delivery systems	Component in material	-
> Energy Sector	Surface coatings for solar panels	Coating	-
	Reaction vessels, stirrers and other		

Search, explore and Substitute It Now

Don't let hazardous chemicals ruin your product

Search



Explore the database >

About the latest update >

Avoid hazardous chemicals – use the SIN List

For thousands of users all over the world Chemsec's SIN List is the tool, as well as an established standard, for identifying hazardous chemicals in different products and processes.

Extended with additional relevant PFAS chemicals and improved





No to PFAS

CHEMSEC'S CORPORATE PFAS MOVEMENT

Contact us

A movement supported by:

INDITEX

H&M

coop

PeakPerformance



PFAS, also called “forever chemicals”, is the collective name for a group of several thousand toxic chemicals used in many consumer products.

Studies have found links between PFAS exposure and various

PFAS MOVEMENT MEMBERS



CHEMSEC CHANNELS

- **Website:** chemsec.org
- **PFAS Guide:** pfas.chemsec.org
- **SIN List:** sinlist.chemsec.org
- **Marketplace:** marketplace.chemsec.org

- **LinkedIn:** [@chemsec](https://www.linkedin.com/company/chemsec)
- **Twitter:** [@chemsec](https://twitter.com/chemsec)
- **Instagram:** [@no_to_pfas](https://www.instagram.com/no_to_pfas)
- **Facebook:** [@chemsecsweden](https://www.facebook.com/chemsecsweden)

