PFAS

Debunking the PFAS competitiveness report

When “competitiveness” is used to defend forever chemicals, it’s worth asking what’s being left out of the conversation. A new EU-commissioned report takes aim at the PFAS restriction proposal — but does their argument hold up? (Spoiler: it doesn’t)

Published on 03 Feb 2026

A recent EU report on PFAS and their role as enablers of competitiveness is leaving a bad taste in peoples' mouths. And for good reason.

The report concludes that the only way for Europe to stay competitive is to give certain sectors unlimited exemptions in the event of a PFAS restriction. Gross.

The authors argue this point by making sweeping claims about the cost of PFAS restriction proposals under faulty assumptions. At best, the authors have a fundamental misunderstanding about the material. At worst, they've put something forward that's intentionally misleading.

There's something… off about this report. Let's break it down.

First, who even wrote this thing?

We're glad you asked. Risk and Policy Analysts (RPA) is an independent consultancy brought on by the European Parliament's Committee on Industry, Research and Energy (ITRE). RPA provides "innovative advice to both public and private sector decision makers."

Of note, RPA conducted a report on PFOS for the UK government in 2004. The report itself was widely panned, with the European Commission's Scientific Committee on Health and Environmental Risks (SCHER) later saying: "the RPA report suffers from a lack of scientific detail to substantiate the recommendations, and the information presented does not appear to be a sufficient basis for decision-making."

Among their chief complaints about the 2004 report, SCHER notes that RPA used 3M's own assessment criteria for impacts on human health. Hardly impartial.

But we're here to talk about competitiveness. Time to debunk.

Assumption #1: Fluoropolymers = all PFAS

The EU parliament sought a third-party analysis on the role of PFAS in Europe's industrial competitiveness. What they got was a report on six fluoropolymers. The authors of the report presuppose that these six key fluoropolymers (PTFE, PVDF, ETFE, FEP, PFA, FFKM/FKM) constitute "93% of all fluoropolymers used within Europe" — verified for the authors by none other than the Fluoropolymer Products Group of CEFIC (CEFIC being one of the largest chemical industry lobbyists in Europe).

Supposing this is true, fluoropolymers are just one single subgroup within the broader PFAS family, making up 24-40% of PFAS on the EU market by volume, according to the European Environmental Agency. Basing any sort of conclusion about a restriction on a fraction of all PFAS in Europe would be completely disingenuous.

But wait, it gets worse.

Assumption #2: Fluoropolymers are harmless

The report admits that exposure to some PFAS groups like PFOA and PFOS may result in health effects like cancer or hormone disruption, but notes that "minimal research has been conducted into possible health effects arising from exposure to the in-scope fluoropolymers." Therefore, the authors presume (ignoring their own chart of known health and environmental impacts from fluoropolymers in the report's Annex), they must be considered safe.

The problem? Existing studies typically assess the health and environmental risks of fluoropolymers on their "use" phase — usually after a product has been purchased by a

consumer and before they have thrown it away. That doesn't, however, account for the fact that the majority of PFAS emissions of polymers occur during the "production" and "end-of-life" phases of a product (when it's being made and after it's thrown away). That might also explain why three chemical companies just settled a lawsuit in the U.S. alleging PFAS contamination that leaked from their industrial sites.

Still, it gets worse.

SIN Producers

The only searchable database of companies producing or importing the most hazardous chemicals in Europe and USA.

GO TO SIN PRODUCERS

Assumption #3: There are no financial benefits to banning PFAS

The report claims that due to limited research, there are currently no known health or environmental damages identified with emissions from the fluoropolymers — as distinct from other PFAS groups; "As a result, neither human health nor environmental damage quantification can take place."

Absurd. In running what amounts to a giant cost-benefit analysis, the authors of this report ascribed zero financial benefit — to people or the environment — to getting rid of these six fluoropolymers. Which, again, they are using to make a sweeping generalisation about all PFAS.

Recently, the EU Commission released a report estimating societal costs of €440 billion if we continue to do nothing about PFAS. This is not new news.

Claim #1: It would be super expensive if PFAS were banned

The report throws out some pretty big numbers about the socio-economic impact of a PFAS restriction, mainly in the form of profit loss and unemployment costs. A full, immediate PFAS restriction (RO1), the authors claim, would cost Europe €562.8 billion in the first year. This number appears to be a sum total of the four sectors' full market value, which could only really occur with the immediate collapse of entire industries.

Awfully defeatist, and not a very reliable cost estimate if you ask us. That back-of-the-napkin math and clear misunderstanding of how limited derogations intentionally give sectors time to adjust may also be why there was so little difference in estimated cost between RO1 and regulatory option 2 (RO2), a PFAS ban with 10+ years to reach a full phase out — the "cost" changed by less than .2%.

It's still worth remembering though: *these numbers are not offset at all by health or environmental impacts because the authors have already assumed zero financial benefit from those factors.*

All cost, no benefit. 100% assumed unemployment for certain sectors. Immediate shut down of certain companies. We'd be doomed! Unless, of course, unlimited exemptions were made.

Claim #2: Unlimited exemptions should be made

Unsurprisingly, the authors of the report argue for a third option: a PFAS ban with time unlimited derogations for the four in-scope sectors — effectively removing them

from a ban altogether. After all, with no push to change in 12 months or even 12 years, why would any company bother making any change whatsoever? But the authors must have known that already, as they set the estimated socioeconomic impact of this option equal to the impact of no ban at all.

Allowing certain sectors to continue using banned chemicals doesn't balance economics with environmentalism, it locks in PFAS for another generation and defeats the purpose of a ban altogether. Ironically, the report points to Green/Clean tech as one of the key sectors needing these unlimited exemptions, but doing so ultimately flies in the face of everything that sector stands for.

If a specific chemical is so difficult to substitute that even attempting to replace it would collapse entire industries, then it's not an enabler of competition — it's a monopoly.

Bonus: Oops, forgot about F-gases

While the authors claim to consider fluorinated gases (F-gases) in their study, there appears to be little in the way of meaningful analysis — aside from a narrow review of two sub-applications and heavy input from industry. Despite that, the report makes clear in no uncertain terms that F-gases should be excluded from any potential PFAS restriction.

F-gases are one of the largest contributors to PFAS emissions in Europe, particularly from refrigeration and heat pump systems. They are also one of the areas where alternatives are most advanced and already on the market — the PFAS restriction dossier itself explicitly identifies high substitution potential for most applications. If the aim of the report was to assess where European industry can transition fastest and most cost-effectively, it would put F-gases front and centre, not on the sideline.

The big picture

In the next few months, the European Chemicals Agency's Committee for Socio-economic Analysis (SEAC) will publish a far more comprehensive and transparent assessment on the exact same issues, raising two simple questions: why was this report released now — and whose interests does it really serve?

The idea that PFAS "enable" competitiveness is a self-fulfilling narrative. It rewards dependence on a single group of chemicals while crippling innovation in safer alternatives. This is clearly not the way forward for Europe.

Related news