

# Introduction to FPP4EU

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**FPP4EU Sector Group Manager**



**28 September 2022**

The European Chemical Industry Council, AISBL – Rue Belliard, 40 - 1040 Brussels – Belgium  
Transparency Register n°64879142323-90



Who are we

PFAS REACH restriction

FPP4EU initiatives



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# FPP4EU, a Sector Group of

**General Assembly**  
M. Mensink

**Cefic Board**  
M. Mensink

**Executive Committee**  
M. Mensink

**National Association Board**  
M. Mensink

**Cefic Leadership Team**  
M. Mensink

## 5 Programme Councils

- Climate Change & Energy  
*C.-H. Robert*
- HSE, Resp. Care & Supply Chain  
*W. Garcia*
- Innovation  
*D. Witthaut*
- Product Stewardship  
*S. Lemoine*
- Industrial Policy  
*C.-H. Robert*

## 3 Advisory Fora

- Advocacy Forum  
*H. Wendt*
- Legal Forum  
*L. Timmermans*
- Sustainability Forum  
*A. Dierckx*

## 3 Industry Sectors

- Specialty Chemicals  
*M. Vermeulen*
- Petrochemicals  
*F. Stokman*
- Halogens  
*M. Pauwels*

## Halogens Sector Groups:

- ✓ Euro Chlor - *M. Pauwels*
- ✓ Chlorinated Alkanes Sector Group - *R. Mariner*
- ✓ European Chlorinated Solvents Association (ECSA)  
*A. Candido*
- ✓ Sodium Chlorate Sector Group - *R. Mariner*
- ✓ Chloroformates Sector Group - *R. Mariner*
- ✓ Potassium Sector Group - *R. Mariner*
- ✓ Fluorinated Products and PFAS for Europe – *P. Muñoz*
- ✓ European FluoroCarbons Technical Committee  
*A. Candido*
- ✓ European Sulphuric acid Association - *F. Ortolan*
- ✓ Euro Fluor - *F. Ortolan*

Programme Councils are supported by multiple **Issue Teams** and **Networks of Experts**



# Who are we?

## Membership

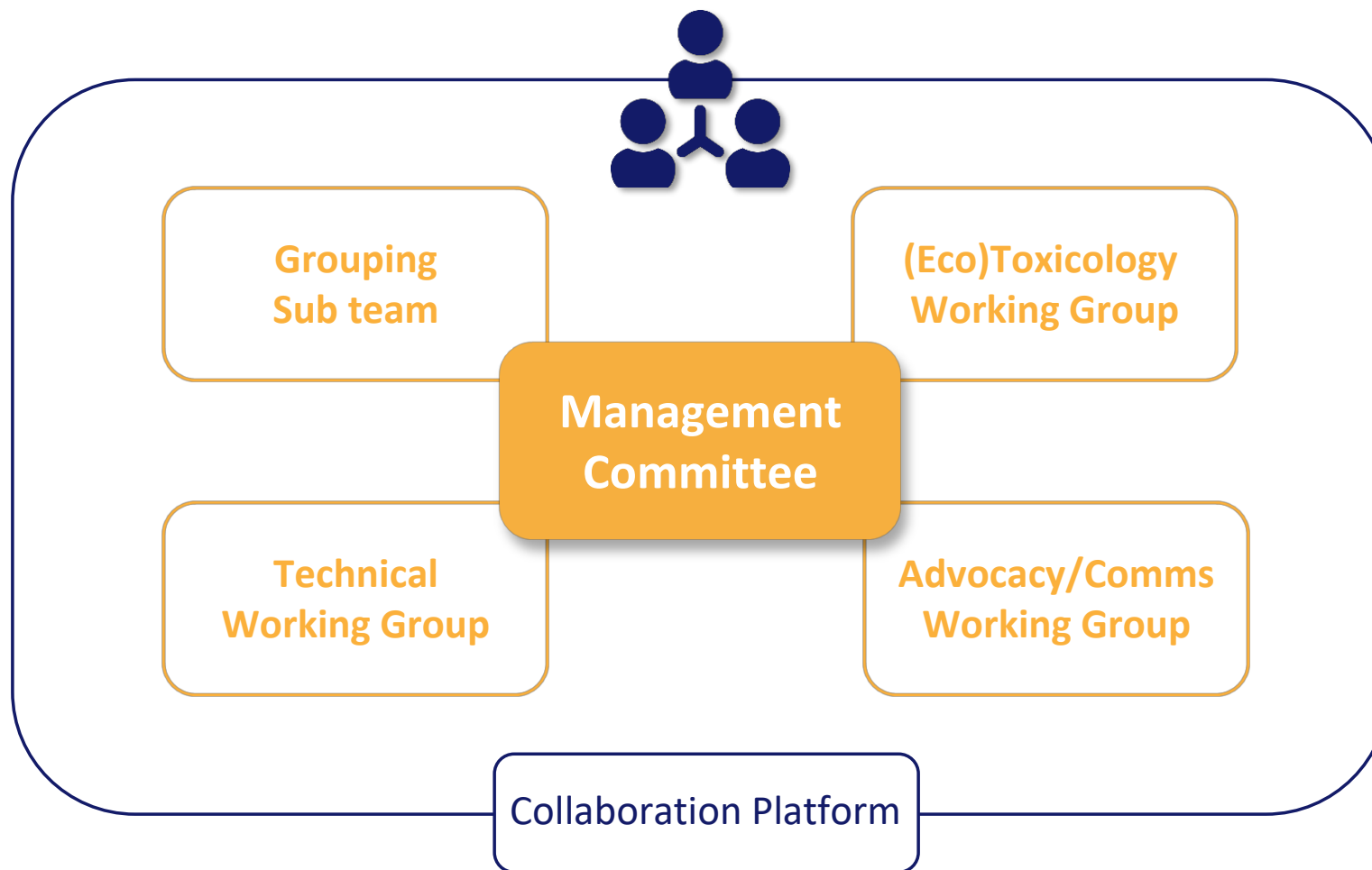


Represents producers, importers and users of the many potential substances that fall within the broad definition of PFAS.



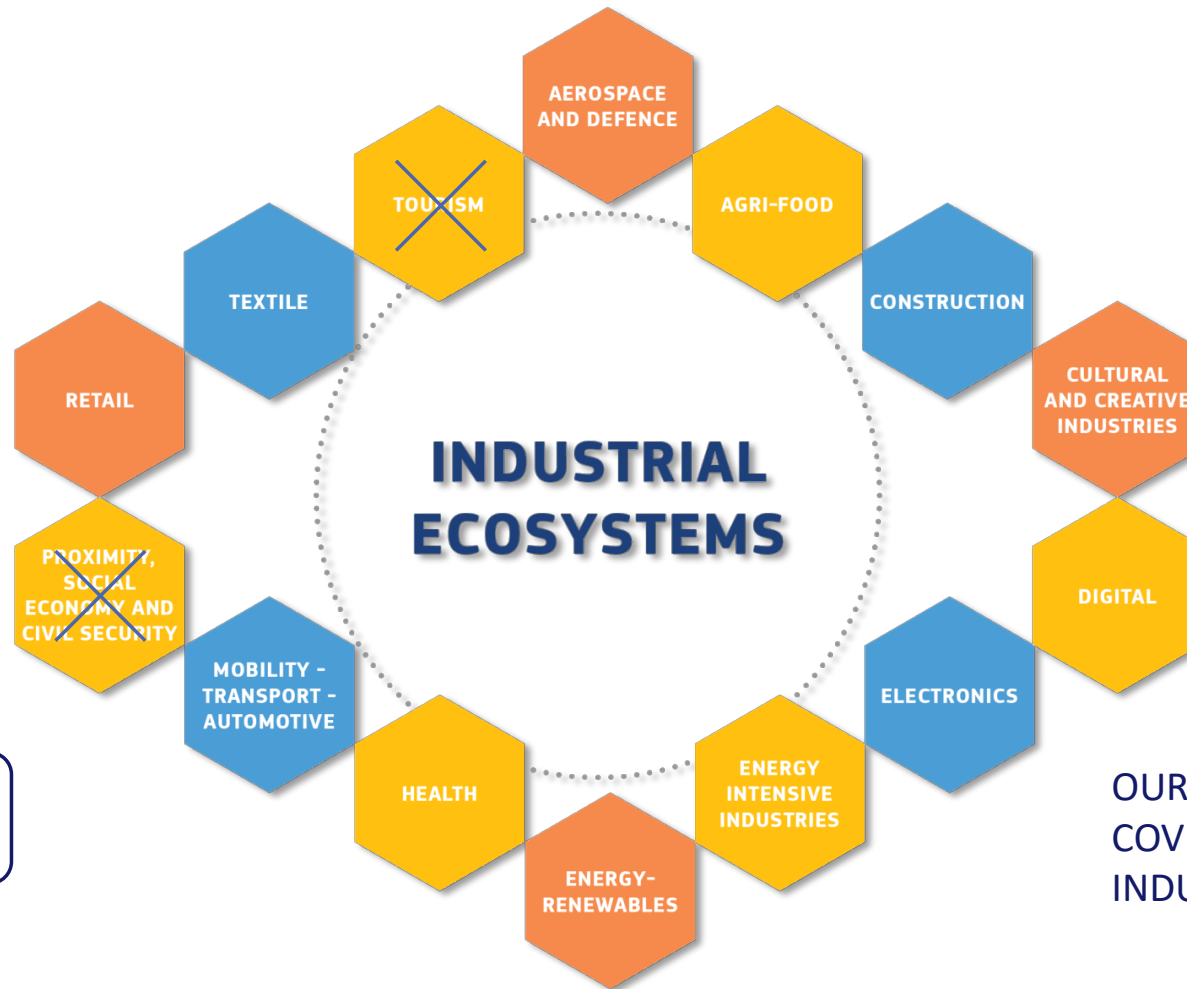
Substances that contain at least one fully fluorinated methyl (CF<sub>3</sub>-) or methylene (-CF<sub>2</sub>-) carbon atom (without any H/Cl/Br/I atom attached to it)

# How are we organized?



# Collaboration Platform

  
> 90 members



ESA is an observer!

OUR DOWNSTREAM USERS COVER THE MAJORITY OF INDUSTRIAL ECOSYSTEMS!!





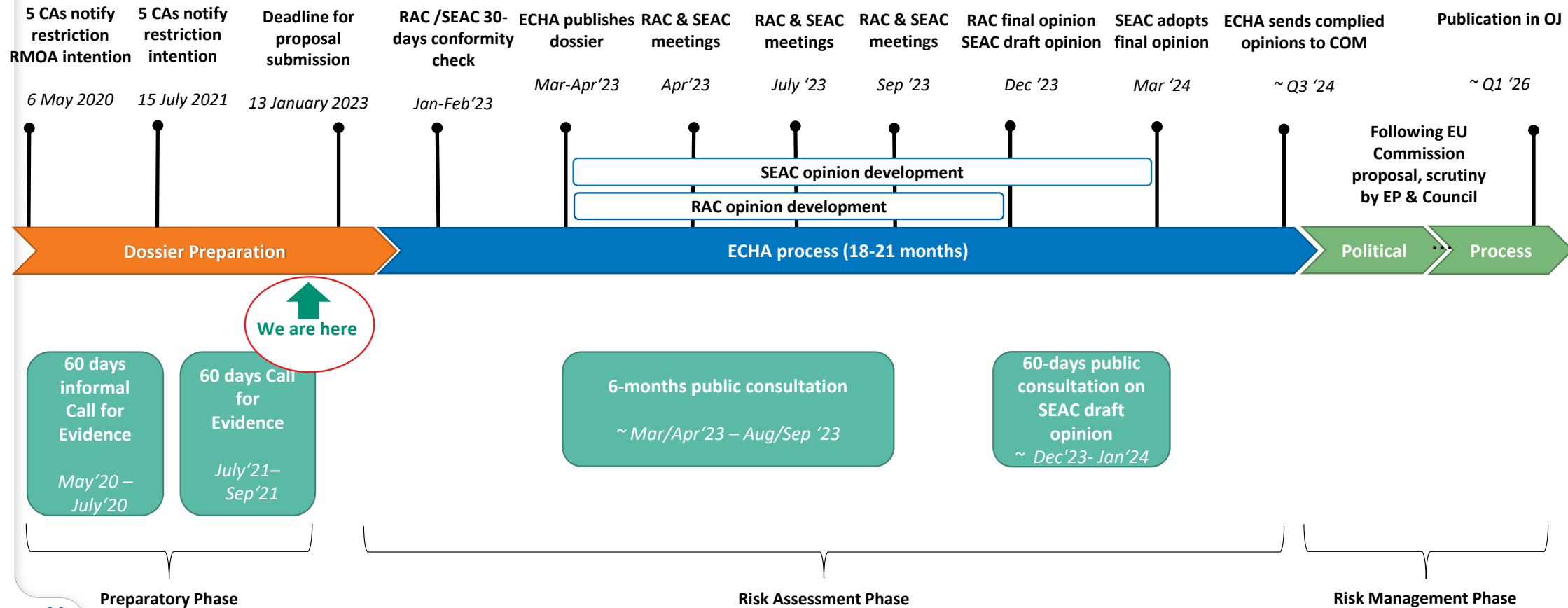
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**PFAS REACH restriction**

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# Wide PFAS REACH Restriction: Indicative Regulatory Timeline\*



\* Assuming the earliest possible timeline.

## PFAS restriction process: some knows

Wider PFAS restriction: dossier under preparation by NL, DE, DK, SE, NO (submission January 2023).

### Some knows:

- Group approach;
- Common concern persistency, additional concerns;
- All uses, except fire fighting foams;
- Commission and European Parliament support the restriction;
- All PFAS in fire-fighting foams restriction: Risk assessment will apply to the wider PFAS restriction.
- Other restriction to consider: Intentionally added microplastics, PFHxA, Perfluorinated carboxylic acids (C9-14 PFCAs) and PFHS



# PFAS restriction process: some unknowns

## Some unknowns:

- Most probably will be structured by applications/uses;
  - This will follow previous restrictions e.g PFHxA and Intentionally added microplastics;
  - The approach adopted by the dossier submitters in the 2<sup>nd</sup> consultation.

 <p><b>The Netherlands</b> <i>Martijn Beekman</i></p> <ul style="list-style-type: none"><li>• medical devices and pharma</li><li>• food contact material</li><li>• production of fluoropolymers</li><li>• waste and recycling</li></ul>	 <p><b>Germany</b> <i>Dr. Mandy Lokaj</i></p> <ul style="list-style-type: none"><li>• chrome plating</li><li>• consumer mixtures</li><li>• transport</li></ul>	 <p><b>Sweden</b> <i>Jenny Ivarsson</i></p> <ul style="list-style-type: none"><li>• textiles, leather, apparel</li><li>• cosmetics and personal care products</li></ul>	 <p><b>Norway</b> <i>Audun Heggelund</i></p> <ul style="list-style-type: none"><li>• F-gases</li><li>• ski waxes</li><li>• applications within oil, gas and mining</li></ul>	 <p><b>Denmark</b> <i>Take Winther</i></p> <ul style="list-style-type: none"><li>• lubricants</li><li>• construction products</li></ul>
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# PFAS restriction process

- Potential end result of the PFAS restriction

76. Substances that contain at least one fully fluorinated methyl (CF<sub>3</sub>-) or methylene (-CF<sub>2</sub>-) carbon atom (without any H/Cl/Br/I atom attached to it)

This is just to give you an idea...

1. Shall not be manufactured, or placed on the market as substances on their own from 15 July 2028
2. Shall not, from 15 July 2028, be used in the production of, or placed on the market in:
  - (a) another substance, as a constituent;
  - (b) a mixture;
  - (c) an article,in a concentration equal to or above 0.1% of a combination of PFAS -related substances.

Followed by many pages including derogations, longer transition period and higher concentration limits.



# PFAS restriction process

Some unknowns:

- Derogations?

Elements to consider in RAC an SEAC consultations?

RAC: considers whether the restriction is appropriate for reducing the risks posed to human health or the environment.



The answer to the consultation will need to show that emissions are controlled. important elements: Site-specific uses, RMM in place, control use including manufacturing, life cycled and disposal.

SEAC: evaluates the socio-economic impact of the proposed restriction on manufacture, placing on the market or use of a substance.



The answer to the consultation will need to show the cost of restricting an application, Important elements: alternatives and cost including societal cost, health cost, substitution cost etc.



Who are we

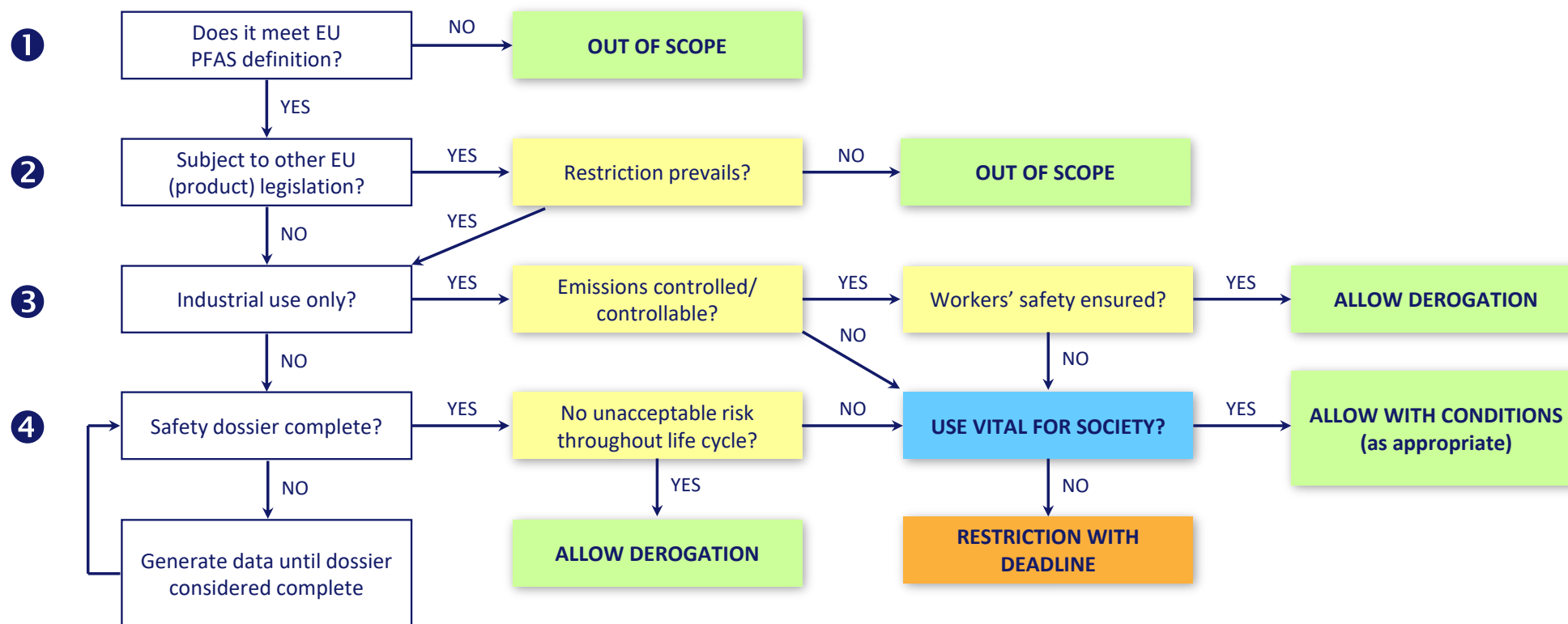
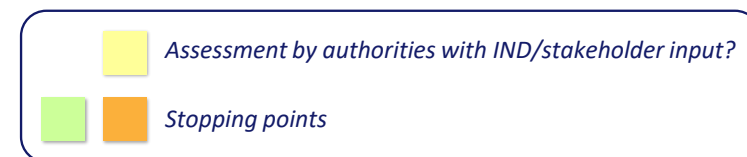
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# Upcoming restriction : can grouping work?

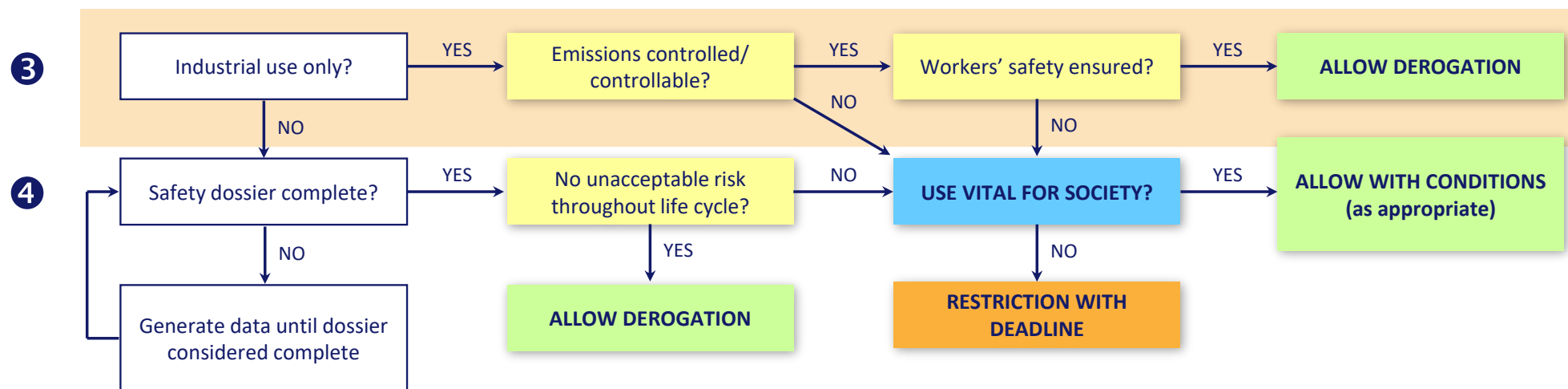
FPP4EU supports the idea of a decision tree



# Upcoming restriction : can grouping work?

## FPP4EU supports the idea of a decision tree

- Industrial uses versus PFAS ending up in consumer products/ articles

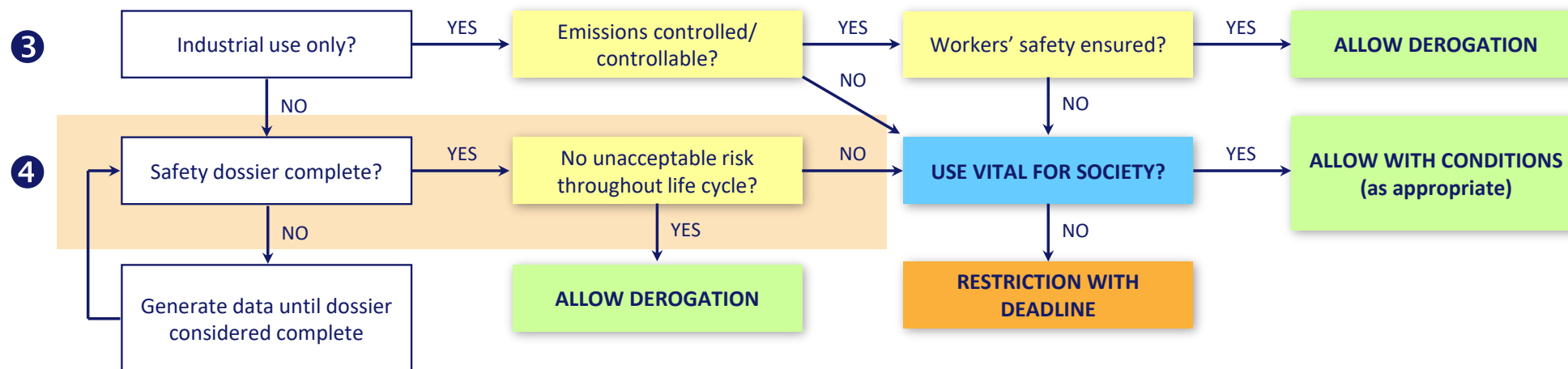




# Upcoming restriction : can grouping work?

## FPP4EU supports the idea of a decision tree

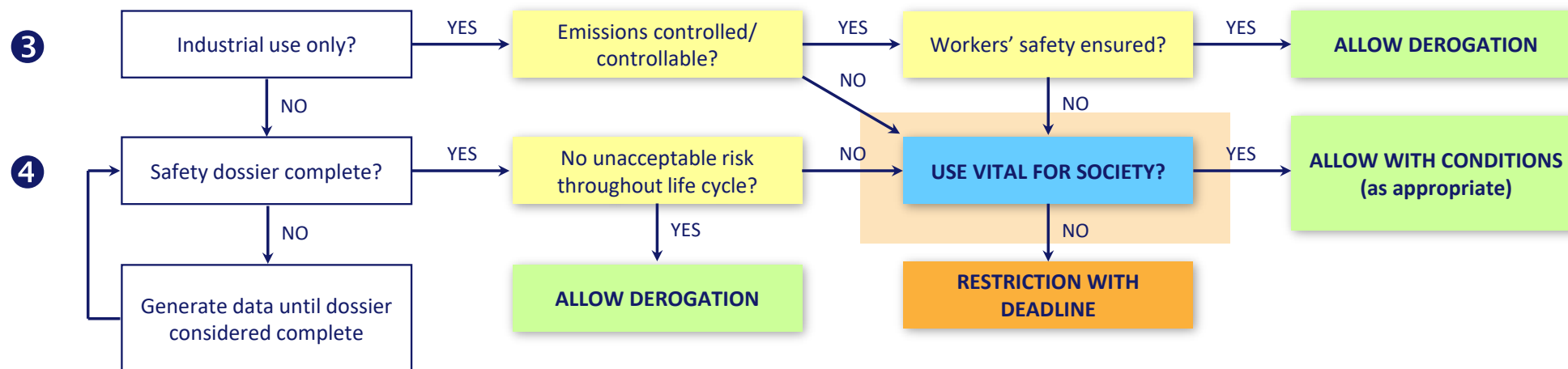
- Risk assessment linked to function/ use/ exposure patterns and based on important properties/ features:
  - Physico-chemical properties, incl. size/molecular weight, physical state, Kow, etc.
  - Presence in the environment (different media)
  - Official status of PBT, CMR , ED, ...
  - Human data, New Approach Methodologies (NAMs) for risk assessment and read-across proposals
  - Potential emissions throughout life cycle (involving DUs)
  - Circularity and end-of-life considerations; appropriate disposal



# Upcoming restriction : can grouping work?

## FPP4EU supports the idea of a decision tree

- Essential uses idea to be considered
- Companies/ downstream users to include assessments of (absence of) alternatives



## Conclusions

- ✓ There is an imminent regulatory process that may restrict the use of PFAS in sealants.
- ✓ Providing data and helping the authorities in the decision process is essential.
- ✓ We may need to consider to start looking in to how to propose derogations.
- ✓ Industry must collaborate in this restriction process.



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THANK YOU !



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