



# EU PFAS restrictions

Process and relation between PFHxA, PFAS in firefighting foams, Universal PFAS and other restrictions

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*Disclaimer: several restriction dossiers are under development, the Commission cannot pre-empt on the outcome of on-going discussions*

# Stockholm Convention - process

- 1. Proposal for listing a new chemical**  
Any party of the Convention, proposal should contain Annex D information
- 2. Apply screening criteria**  
Committee examines proposal, Secretariat invites Parties and observers to provide Annex E information
- 3. Develop a risk profile**  
Committee develops a risk profile and evaluates, Secretariat invites Parties and observers to provide Annex F information
- 4. Develop a risk management evaluation**  
Committee develops a risk management evaluation and recommends to COP if the chemicals should be listed
- 5. List the chemical in Annex A, B, and/or C**  
COP decides on listing

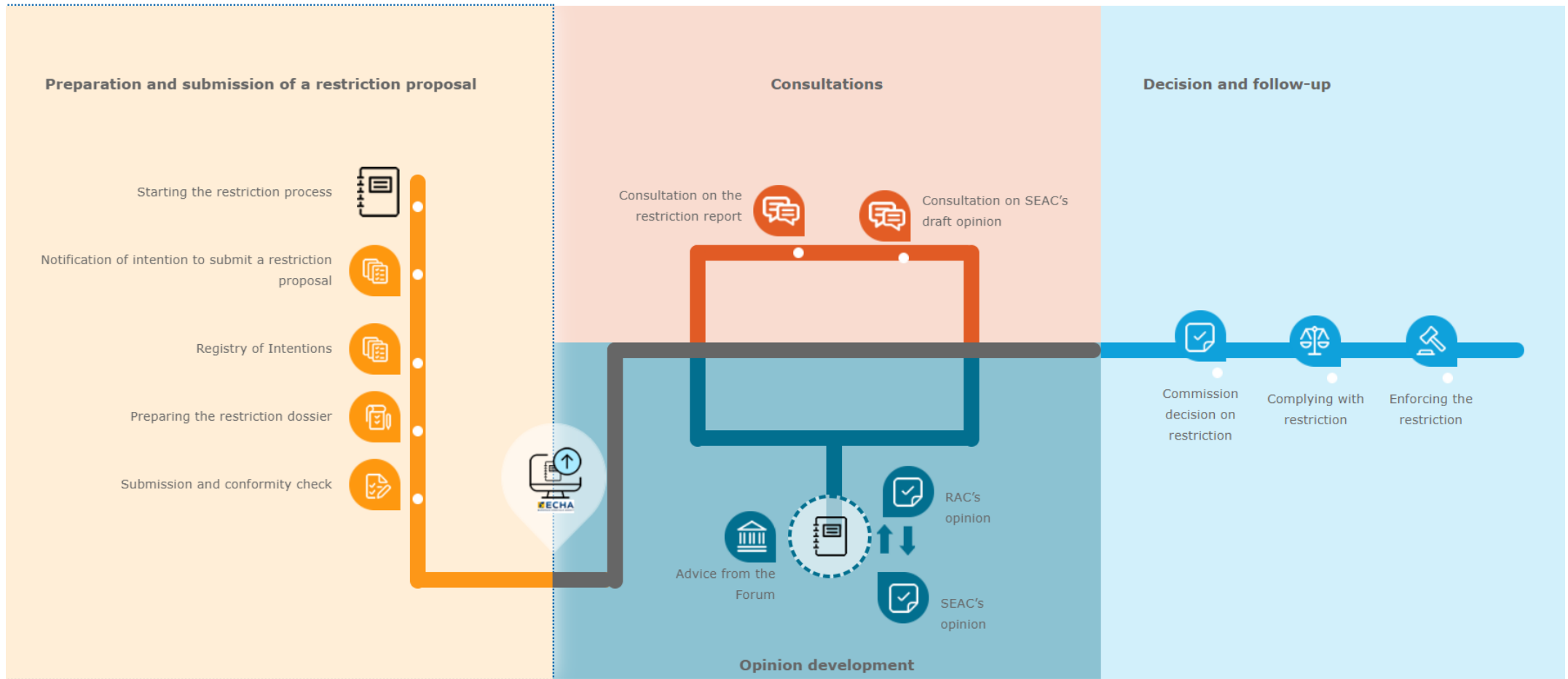
[Stockholm Convention - Home page \(pops.int\)](https://pops.int)

# Stockholm Convention – PFAS

Global ban on Persistent Organic Pollutants (POPs), in Europe implemented by the POP regulation

- Chemicals list in Annex A (elimination)
  - PFOA
  - PFHxS (*EU implementation on-going*)
- Chemicals list in Annex B (restriction)
  - PFOS
- Chemicals proposed for listing
  - Long chain PFCAs

# REACH restriction - process



[Restriction process - ECHA \(europa.eu\)](https://eucha.europa.eu)

# REACH restriction - PFAS

## Annex XVII of REACH

- C9-C14 PFCAs (entry 68)
- TDFAs<sup>1</sup> (entry 73)
- PFHxS, *RAC-SEAC opinion published 2020 → POP regulation*
- PFHxA, *RAC-SEAC opinion published 2022*
- PFAS in firefighting foams, *discussed by RAC-SEAC*
- Universal PFAS, *in preparation*

<sup>1</sup> Trideca-fluorooctyl silanetriol

# Common understanding paper (2014)

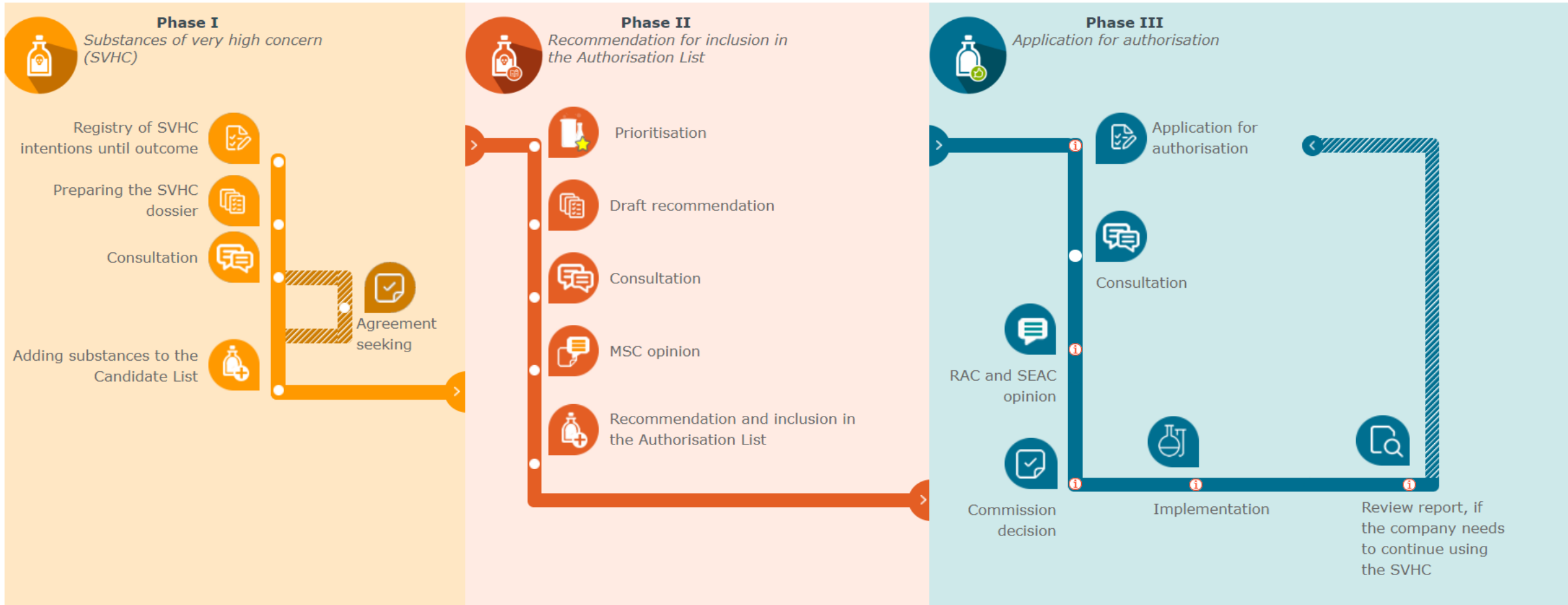
REACH and the Stockholm Convention as well as the UNECE POP Protocol, a common understanding

[Relationship with other legislation \(europa.eu\)](#)

Most important:

To avoid double regulation; no REACH restriction entry if the substance is regulated through the POP regulation, timing issues.

# REACH SVHC - process



[Authorisation process - ECHA \(europa.eu\)](http://europa.eu)



# REACH SVHC - PFAS

PFASs identified as substances of very high concern (SVHC)(art. 59)

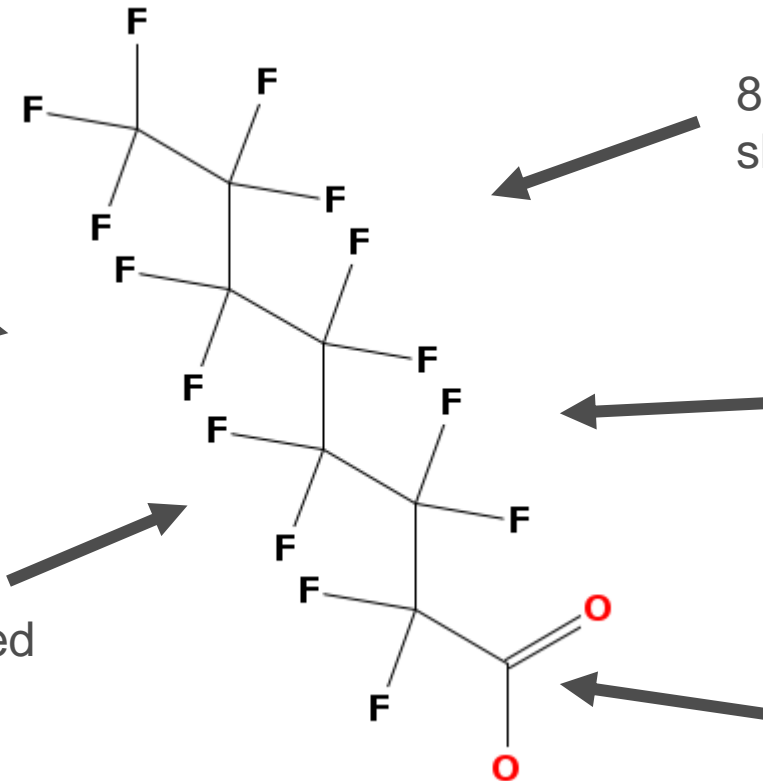
Substance	EC no	CAS no	Concern
HFPO-DA (GenX)	-	-	ELoC having probable serious effects to human health and environment (Article 57(f) - human health)
PFBS (C4)	-	-	ELoC having probable serious effects to human health and environment (Article 57(f) - human health)
PFHxS (C6)	-	-	vPvB (Article 57e)
<i>PFHpA (C7)</i>	203-615-4		<i>Under discussion</i>
PFOA (C8)	206-397-9	335-67-1	Toxic for reproduction (Article 57c) PBT (Article 57d)
PFNA (C9)	-	-	Toxic for reproduction (Article 57c) PBT (Article 57d)
PFDA (C10)	206-400-3	335-76-2	Toxic for reproduction (Article 57c) PBT (Article 57d)
PFUnDA (C11)	218-165-4	2058-94-8	vPvB (Article 57e)
PFDoDA (C12)	206-203-2	307-55-1	vPvB (Article 57e)
PFTTrDA (C13)	276-745-2	72629-94-8	vPvB (Article 57e)
PFTeDA (C14)	206-803-4	376-06-7	vPvB (Article 57e)

# Need for grouping

Regrettable substitution

Linear chain: replaced  
by branched chains

Functional ether group (-O-) added

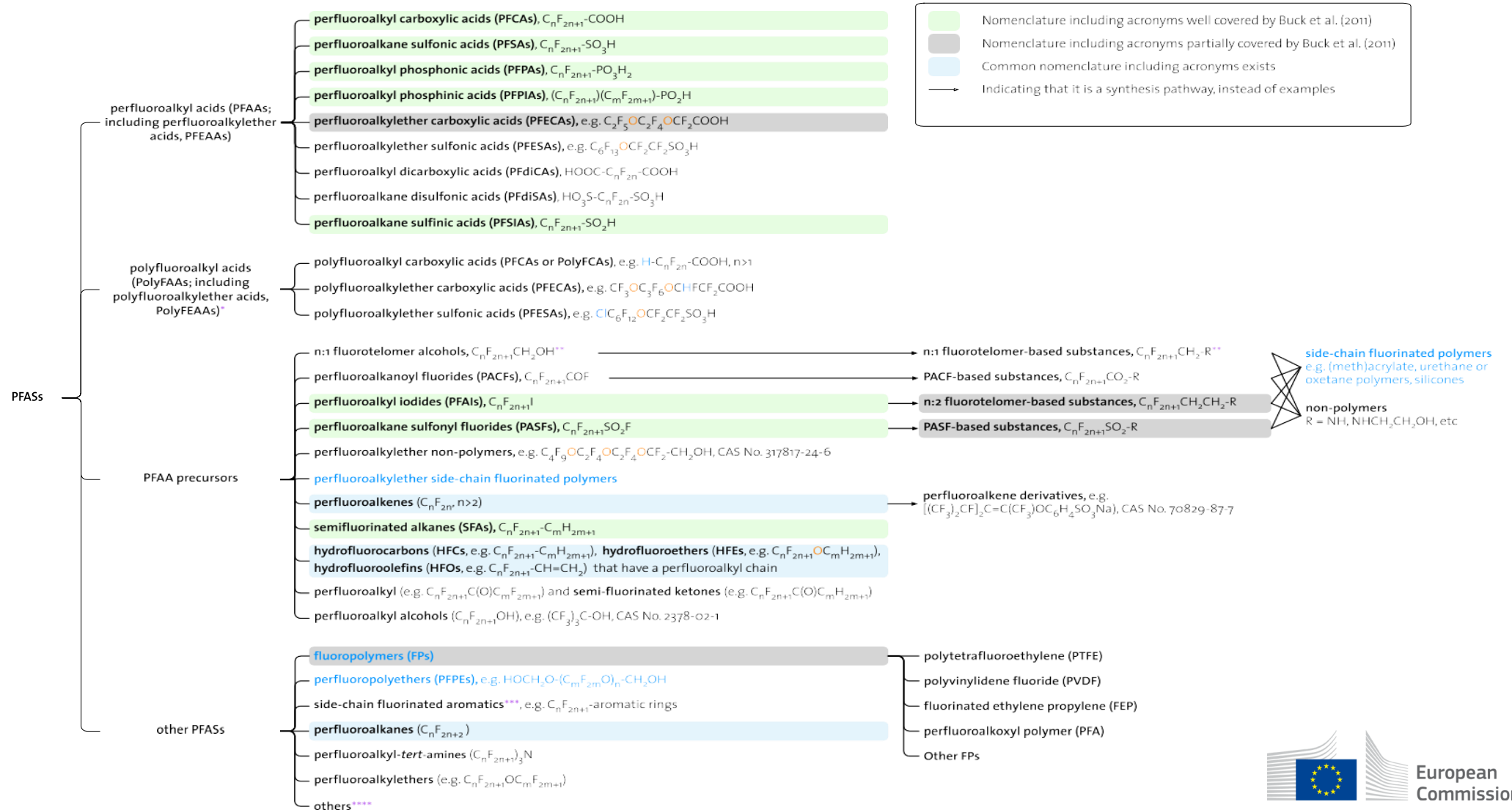


8 C atoms, replaced by  
shorter or longer chains

etc.

C or S atom,  
replaced by P

# PFAS groups (OECD)



# Universal PFAS

- Dossier will be submitted January 2023 by DE, DK, NL, NO, SE
- Broad chemical scope (OECD 2021), including F-gases and fluoropolymers
- Common concern: extreme persistence
- According to the current REACH legislation
- Provide your input in the consultation phase

*[restriction is under development]*

# REACH revision – main elements

Lack of information on certain hazards

- Increase **information requirements** (ED, low tonnage substances; use/exposure information, low tonnage CSR, DMEL)
- **Polymers**
- **Safety data sheets**
- “Cocktail effect” and **mixture assessment factor**

Authorisation and restriction processes too complex

- Extend **generic risk management approach**
- Simplify **authorisation and restriction processes**
- Introduce **essential use concept**

Insufficient enforcement

- **Revoke registration numbers** for constantly incompliant dossiers
- **European Audit capacity**
- Strengthen **customs** controls, combat **fraud** and tackle **online sales**
- **Access to justice**

# Next steps

- Finalisation of **impact assessment** on the basis of RSB comments
- **Legal drafting** has started
- **Commission proposal** foreseen in Commission work programme for Q4 2023

# Thank you



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