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Kind attention:

Mr. Martijn Beekman - Netherlands  
Dr. Mandy Lokaj - Germany  
Mrs. Jenny Ivarsson - Sweden  
Mr. Toke Winther - Denmark  
Mr. Audun Heggelund - Norway  
Mr. Mark Blainey - ECHA

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**Through:** Pro-K Industrieverband Halbzeuge und Konsumprodukte aus Kunststoff e.V. (pro-K), Städelstr. 10, 60596, Frankfurt am Main, Germany

The members of pro-K mainly focus on processing of Fluoropolymers, part manufacturing and its applications, the involvement of downstream users in PFAS process.

**Subject:** PFAS restriction proposal & request for exemption of FLUOROPOLYMERS

**Reference:** PFAS - Registry of restriction intentions until outcome (RoI) dated 15<sup>th</sup> July 2021

Dear Sir/Madam,

With regards to Registry of Intention (RoI) filed by 4 EU Member States (Germany, the Netherlands, Sweden, and Denmark) & Norway for the restriction of PFAS, we, a member of fluoropolymer downstream user industry, hereby, would like to share some salient facts related to the importance of fluoropolymers, critical functionalities, performance and benefits of its applications to society, while acknowledging concerns regarding PFAS emissions related to the use of fluoropolymers and their end of life.

Registry of Intention for PFAS restriction was announced by ECHA on 15<sup>th</sup> July 2021, to prepare a restriction proposal for PFAS. Fluoropolymers are also included in the scope. The restriction proposal is intended to be submitted to ECHA by 15<sup>th</sup> July 2022.

Fluoropolymers are a distinct subset of PFAS and are inherently safe, non-mobile, non-bio accumulative and non-toxic. Fluoropolymers are different from other PFAS as they **do not share the toxicological and environmental profiles** associated with PFAS of concern. Fluoropolymers have **unique set of physicochemical properties**, they meet OECD polymer of low concern criteria, and are considered to have **insignificant environmental and human health impact**.

Fluoropolymers ensure safety, reliability, durability and critical performance in numerous technologies, industrial processes and everyday applications that are important for human

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health, safety, and the environment. With a unique combination of functionalities, fluoropolymers are irreplaceable across many key sectors/applications. Alternatives to

fluoropolymers, if exist, escalate safety risks, carbon footprint, technology regression, and do not match the advanced performance of fluoropolymers. Most importantly, restriction on fluoropolymers will make EU industry lose its technological superiority over other economies and could put Europe's climate and energy goals at risk. Overall, fluoropolymers contribute heavily to Europe's socio-economic status and are critical for the betterment of the society.

The fluoropolymer processing industry acknowledges the concerns regarding PFAS emissions due to the use of fluoropolymers and end of life processes. They wish to assure the authorities and EU Member States that, they are implementing Best Available Technologies to ensure reduction in PFAS emissions in a systematic way and eventually eliminating them to achieve EU's sustainability goals. Parallely, they are consciously working on recyclability and reusability to meet circular economy goal.

Fluoropolymers play an important role in achieving EU Green Deal objectives and UN Sustainable Development Goals (UN SDG) because of their vital use in Lithium-ion batteries, Green hydrogen, Fuel Cell, Solar and Wind energy. No new-age technologies are possible without the use of fluoropolymers. Restriction on the use of fluoropolymers would adversely impact implementation of these technologies crucial for planet's future as well as in all existing applications vital for the society.

Considering the benefits of fluoropolymer applications to environment and society, low PFAS emissions and initiatives being taken by the processing industry to further minimize emissions and closing the loop by implementing circular economy wherever possible, we request for a **complete exemption of fluoropolymers from the PFAS restriction proposal.**

#### **Fluoropolymers processed by Dr. Schnabel GmbH and SGL Carbon SE:**

- PTFE (Polytetrafluorethylen)
- PFA (Perfluoralkoxy)
- PVDF (Polyvinylidenfluorid)

#### **Service application industries:**

- **Energy**
  - o Fuel cells for **green mobility** (PTFE coating of gas diffusion layers (GDL) as the most critical fuel cell component)
- **Pharmaceutical & chemical industry:**
  - o Linings for chemical process equipment → enhanced efficiency (**CO2 and resource consumption reduction**) in the production of base chemicals, e.g. HCl, HF, sulphuric acid and many more, which are further used in production of a huge variety of every day products
  - o Lining and sealings for pipework for aggressive media (strong acids and bases) → **enhanced safety** when operating harmful substances, **reduced waste, resource consumption** including energy (hence **reduced CO2 emission**) because of **longer component lifetime, reduced emissions of potential harmful substances (compliance with current and future emission regulations, e.g. novella of German "TA-Luft")**



- Coating of rupture discs → **enhanced safety** when operating harmful substances
  - Sealing for heat exchangers operated in aggressive media → **energy savings for reduced CO2 emissions**
  - **Energy recovery** in various industries → Compound of graphite and fluoropolymer for heat exchanger plates for aggressive media lead to enhanced energy savings, reduced fouling and maintenance and hence to **reduced CO2 emissions**
  - Coatings for **sealings** in various industries, e.g. **automotive, petrochemistry,**
- **Agriculture:** Linings and sealings for **fertilizer production** → handling of aggressive media, e.g. in phosphate rock processing
- **Life science / food industry:** FDA compliant linings for pipework and e.g. flow meter control systems for clean, safe and contamination free products for human well-being.

Sincerely yours,

A handwritten signature in blue ink that reads 'J. Kopka'.

Jürgen Kopka  
Dr. Schnabel GmbH  
General Manager

