

18 October 2021

EFCTC submits detailed input to the second consultation for the proposed REACH restriction of PFAS

EFCTC has submitted detailed input to the second consultation for the proposed REACH restriction of PFAS aiming at helping the authorities compile complete and robust data sets to evaluate the possible inclusion of F-gases in the restriction proposal.

Brussels 18 October – EFCTC, a Sector Group of Cefic, supported the positive move by the five authorities responsible for the proposed REACH restriction on PFAS to offer the opportunity to provide further information through this second stakeholder consultation. EFCTC had already provided data in the context of the call for evidence in July 2020 and has worked to provide additional information during this second round.

The information submitted by EFCTC has provided more detail on the ways that the use and emissions of F-gases are already managed successfully under the F-gas regulation (Reg. 517/2014) which aims at reducing F-gas emissions by two thirds of 2010 levels by 2030 through a well-established quota system for HFCs.

Scientific studies and analyses have been cited¹ to demonstrate that F-gases are neither nor bio-accumulative nor toxic. Most of them break down to non-persistent substances, only a small group produces very low concentrations of a substance called trifluoroacetic acid (TFA), which, although persistent, is a naturally occurring, inert and non-bio-accumulative substance.

More broadly, HFOs and HFCs play a crucial role in the context of the EU Green Deal and EU decarbonization goals, including by more widespread adoption of heat pumps, through their efficiency in use, good toxicological profiles, low flammability, and energy efficiency.

EFCTC has also noted that the submission of information should not be considered as an agreement on the inclusion of F-gases in the scope of the proposed REACH restriction. Notwithstanding that the scope of the proposal for a REACH restriction is not yet defined, EFCTC believes that F-gases should not be included within this restriction proposal and that the F-gas Regulation is the most appropriate regulation to control emissions of HFOs and HFCs.

EFCTC remains ready to provide further information to ensure that the data sets on F-gases are as robust and comprehensive as possible, confirming that they should not fall into the scope of the

¹ <https://www.fluorocarbons.org/resources/position-papers/>

upcoming proposed restriction due to their chemical properties and the management of emissions and use provided through the existing regulations.

About EFCTC

The European FluoroCarbons Technical Committee is a Cefic Sector Group that monitors legislation related to HFCs (hydrofluorocarbons), and HFOs (hydrofluoro-olefins) in the EU and at global level.

Fluorocarbons are used as feedstock, as refrigerants, as solvents and as blowing agents for insulation plastic foams.

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