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ECHA publishes document on proposal for a universal PFAS restriction – certain F-gases to be impacted by upcoming restriction

EFCTC notes the publication of the documents relative to the proposal for a universal REACH restriction of PFAS and the inclusion of applications that use certain F-gases. EFCTC also welcomes the openness from the dossier submitters to base the proposal on separate analysis of each and every use, and will take the time to analyse the proposal and submit its considerations to the ECHA public consultation. We encourage other associations and companies impacted to actively take part in the process.

The European FluoroCarbons Technical Committee (EFCTC) notes that certain F-gases have been included in the proposal and that there has been a separate analysis of each of the uses of the F-gases in scope.

*“F-gases are a class of substances that are **already successfully regulated under the F-gas Regulation**. This Regulation covers the management of the possible hazards connected to the emission of F-gases in the environment by **establishing strict measures to ensure that F-gases are handled by certified installers and equipment is designed to minimise leakage**. Many of the applications covered within the restriction proposal are **critical to society** such as refrigeration, air-conditioning, foam insulation, medical devices, as well as an increase in the use of heat pumps (included in the REPowerEU goals), vital to meeting the EU’s aims for climate change and Fit for 55. Beyond the initial analysis carried out for the restriction proposal, EFCTC calls for further **detailed and careful consideration from the authorities** on each application to ensure that any substitution **still allows high efficiency** to be attained and the necessary safety standards to be met”. Nick Campbell, Chairman of EFCTC.*

EFCTC welcomes this openness from the dossier submitters and will now take the time to analyse in detail all the relevant documents of the proposal and will submit a response to the public consultation with its views on the inclusion of F-gases. EFCTC intends to share its final report of the 2022 Socio-Economic Assessment with the ECHA Committees, as well as its final report on the ongoing Regulatory Management Options Analysis, undertaken for eight HFCs, HFOs and HCFOs in the scope of the restriction. Both studies have been conducted by the independent consultancy Ricardo Energy & Environment.¹

EFCTC encourages companies and business associations to follow and get involved in the process, first by assessing how this proposal could impact their business and their sectors. It is extremely important that accurate data (for example, scientific, risk, and social and economic information) is submitted to the ECHA Committees through the upcoming Public Consultation (planned to be launched on 22

¹ See EFCTC website pages on [SEA](#) and [RMOA](#)

March 2023), to ensure that the decision regarding this restriction is proportionate and based on comprehensive and complete datasets, and is also enforceable.

Due to the unprecedented nature of this proposed restriction, EFCTC believes it is important that the authorities, and specifically the ECHA Committees, consider the possibility to adjust the REACH restriction process to allow opportunities for stakeholders to fully participate and contribute. This could be achieved by planning sector-specific discussions and the organisation of workshops open to interested stakeholders.

EFCTC remains available to provide further information about F-gases in the context of their inclusion in the REACH restriction process of PFAS.

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.

Contact:	EFCTC Chairman:	Dr. Nick Campbell, nick.campbell@arkema.com
	EFCTC Secretariat:	Elisa Consoli, eco@cefic.be