

22<sup>nd</sup> March 2023

### **GFL's position on the wide PFAS restriction proposal by Europe**

Gujarat Fluorochemicals (GFL) shares its opinion on the wide PFAS restriction proposal submitted by five countries (Netherlands, Germany, Sweden, Norway and Denmark) under the European Union's REACH regulation. This is the first step in a long process until 2025.

GFL is in favor of regulating substances that pose unacceptable risks to human health & environment. Nevertheless, it is important to note that not all PFAS pose an unacceptable risk and there are some that do not pose any risk e.g. fluoropolymers.

GFL finds the restriction proposal overly broad, inconsistent without any rigorous scientific evaluation of risks attached. It is unfortunate that the proposal ignored important data submitted by industry during Call for Evidences (CfEs) and at other interactions between stakeholders and regulators. Fluoropolymers are included in the restriction proposal only due to their persistency, in absence of other hazards like mobility and bioaccumulation which does not fall under unacceptable risk definitions such as PBT, vPvB, PMT, vPvM.

GFL does not agree with the Proposal's view that alternatives to fluoropolymers either exist or can be developed easily without considering serious trade offs. The dossier is also disproportionate by cost/risk to benefit ratio given the huge societal benefits of fluoropolymer applications.

We strongly believe in the safety of fluoropolymers during their lifecycle with proper abatement techniques pursued and avoiding the use of fluorinated polymerization aids. We understand that there are several categories of PFAS substances that could be a potential risk to health & environment, however, fluoropolymers as a sub-group should be differentiated from these substances of concern. GFL's fluoropolymers are inherently safe materials which are non-toxic, neither mobile, nor bio-accumulative.

ECHA will start public consultation on 22<sup>nd</sup> March 2023. GFL will submit strong evidence proving there is neither hazard nor exposure of Fluoropolymers that warrants the definition of 'unacceptable risk'.

We earnestly encourage the fluoropolymer value chain to participate during the public consultation.