



**Subject:** Per- and polyfluoroalkyl substances (PFAS) substances

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Dear Sir or Madam,

Thank you for your inquiry regarding the implementation of the substance-specific topic of per- and polyfluoroalkyl substances (PFAS) in our company, on which we comment as follows:

**Background/proposal for the restriction of PFAS:**

On 25 September 2023, the European Chemicals Agency (ECHA) completed the consultation phase on the PFAS restriction proposal (official name: ECHA restriction dossier) and started the evaluation by the scientific committees (including the RAC Committee).

A revision of the comprehensive approach is to be expected and the lack of a risk-based approach to date has also been heavily criticised by industry associations, including WSM.

The main PFAS applications are fluorinated gases (e.g. fire extinguishing foams, coolants), textiles (e.g. outdoor clothing), in contact with food (e.g. pizza boxes), in the transport industry (chemical transport) but also in lubricants, for example. PFAS in steel and metal processing is used in a very small area of metal plating with highly specialised technical specifications (temperature, pressure, radiation and chemical resistance) in various finishing processes.

**Some current facts and current results of the ECHA evaluation:**

- The dossier-submitting authorities and ECHA are currently gaining an overview of the record number of over 6000 submissions through a so-called 'sector-by-sector processing',
- the restriction dossier is currently being revised,
- the main relevant PFAS environmental impacts lie in the PFAS production process and in leaching during landfilling. Leaching in the operational phase of technical products (e.g. surface coatings) plays a massively subordinate role.

- PFAS is destroyed in the combustion phase (e.g. steel recycling process) at above 1100 °C

The EU Commission, as the commissioning body, states that essential industrial uses of PFAS are crucial for the Green Deal, among other things (ECHA-Progress update, November 2024). It is foreseeable that the use of PFAS will be banned in many consumer products (e.g. cosmetics, food contact, leisure clothing). In addition, there are no substitution options for many technically demanding and critical PFAS uses.

**Conclusion and significance for our products:**

- There is currently no legal obligation to notify or provide information,
- It will only be decided in the future whether a PFAS restriction or ban in industrial products will be applied at all,

We ask for your understanding that we are realising compliance with the relevant environmental regulations as part of our legal compliance principle, but that we do not yet have any specific information on PFAS.

We hope that the above information has given you a satisfactory impression of our efforts to integrate PFAS into our business processes.

If you have any further information on the subject of substance policy, please do not hesitate to contact us.

Yours sincerely

HEINRICH EIBACH GmbH