

Subject: REACH Restriction Proposal concerning PFAS

Poly- & perfluorinated alkyl substances (PFASs) is a class of synthetic organic chemical substances that at least contain one -CF₃ (“trifluoromethyl”) or -CF₂ (“difluoromethyl”) moiety without additional H, Cl, Br or I atoms attached to it. Based on that OECD classification, at least 10,000 individual compounds fall into this category, including fluoropolymers and polymers with fluorinated side chains. These “forever chemicals” are associated with severe negative environmental impacts such as:

- *increasing accumulation in our groundwater, surface water, and soil, ultimately ending up in our food chain;*
- *certain PFASs are toxic for reproduction, can harm the development of fetuses, and cause cancer development;*
- *large-scale recycling is (yet) not possible.*

Five member states of the European Union submitted a proposal regarding **restriction on the manufacture, placing on the market and use of PFASs** on January 23rd, 2023 ([LINK](#)). Paragraphs 5 and 6 of the proposed restriction entry text include several **sector-specific derogations** referring to Table 9 of the ANNEX XV RESTRICTION REPORT ([LINK](#)). **The proposed derogation periods are 5 or 12 years, excluding an additional 18-month transition period.**

We are monitoring the development of the current proposal towards concrete restriction conditions adopted by the European Commission EC). ECHA published a timeline ([LINK](#)) that illustrates the upcoming and already taken steps of that restriction process. Based on the future opinion of the ECHA’s committee, which will be sent to the EC for consideration, we will proactively initiate mitigation actions accordingly.

Very few products are currently affected, mainly due to the presence of certain fluoropolymers:

- all lithium coin cell batteries,
- all automotive HID bulbs of the series D1, D3, D5;
- specific product ranges of automotive LED retrofits bulbs

The IMDS datasheets/declaration of the impacted products above disclose the individual material that contains PFAS or is made of PFAS.