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To

**Mr. Audun Heggelund**

Norway Environment Agency

**Mr. Martijn Beekman**

National Institute for Public Health and the Environment

**Dr. Mandy Lokaj & Mr. Carl Dannenberg**

Federal Institute for Occupational Safety and Health (BAuA)

**Ms. Jenny Ivarsson**

Swedish Chemical Agency

**Mr. Toke Winther**

Ministry of Environment and Food of Denmark

Brussels, 19 October 2021

**Subject: EFCTC Cover note to the submission to the second Stakeholder Consultation on PFAS**

Dear Mr. Heggelund, Mr. Beekman, Dr. Lokaj, Mr. Dannenberg, Ms. Ivarsson, Mr. Winther,

On behalf of the European FluoroCarbons Technical Committee ([EFCTC](#))<sup>1</sup> – a Sector Group of the European Chemical Industry Council ([Cefic](#)), I would like to share with you additional information regarding our submission to the Second Stakeholder Consultation on PFAS closed on 17<sup>th</sup> October 2021.

EFCTC has already provided data in the context of the call for evidence in July 2020 and worked to provide additional information during this second round. It should be 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 you are collecting a broad range of information across a large group of fluorinated products and, at present, the clarity of the scope of your proposal for a REACH restriction is not yet

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<sup>1</sup> EFCTC is comprised of Arkema, Chemours, Daikin, Honeywell and Koura and represents the five major manufacturers and suppliers of hydrofluorocarbon (HFC) refrigerants and air-conditioning gases in the EU.

defined, we believe that F-gases should not be included within this restriction proposal. As we have already explained in our submissions, 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. Furthermore, scientific studies and analyses, that we have cited, demonstrate that F-gases are not persistent.

As is further confirmed by their REACH registrations, F-gases are not persistent, nor bio-accumulative or toxic. Most of them break down to non-persistent substances, only a small group produces very low concentrations of a naturally occurring inert and nonbioaccumulative substance called trifluoroacetic acid (TFA), which, although persistent, is a naturally occurring, inert and nonbioaccumulative substance. Rigorous studies show that concentrations of TFA in the environment from the degradation of HFOs do not present a risk to humans or the environment. These studies and their conclusions have been carefully evaluated and summarized by the UNEP Environmental Effects (EEAP) and Scientific Assessment Panels (SAP) to the Montreal Protocol.

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

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 upcoming proposed restriction due to their chemical properties and the impacts on use and emissions both now and, in the future, from the existing regulations.

Yours sincerely,

*Nick Campbell*  
EFCTC Chairman

#### 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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