



Bundesanstalt für Arbeitsschutz  
und Arbeitsmedizin

# Update on the PFAS restriction proposal

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# Content

- Introduction
- Findings from the Annex XV report consultation
- Addressing the consultation input
- Summary

# Introduction: Need for restriction

## Hazard

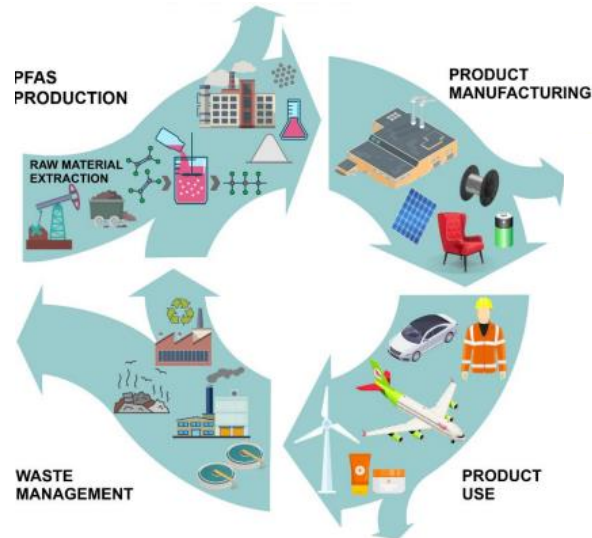
PFAS

Persistence

Mobility

Bioaccumulation

(Eco)toxicity, other properties



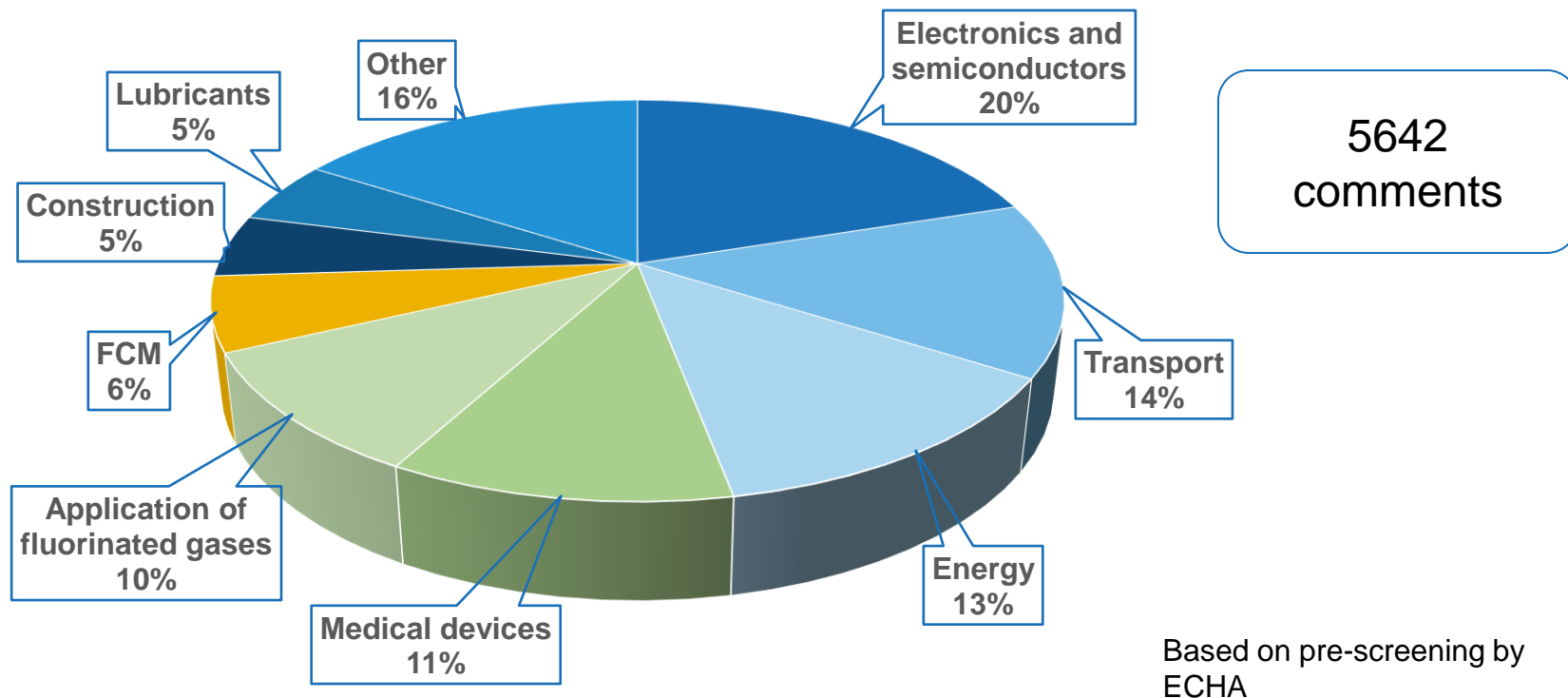
**75 000 tons**  
of emissions in  
2020

**4.5 Mio. tons**  
of emissions over  
30 years

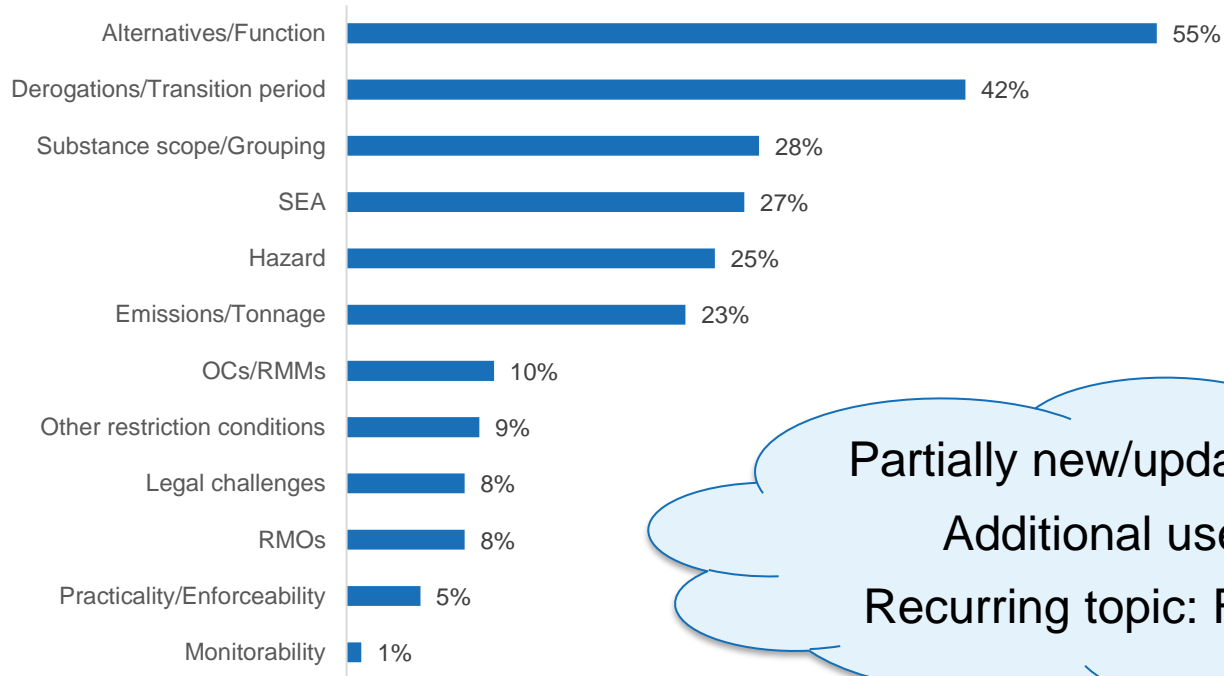
Source:

[https://ec.europa.eu/environment/pdf/chemicals/2020/10/SWD\\_PFA.pdf](https://ec.europa.eu/environment/pdf/chemicals/2020/10/SWD_PFA.pdf)

# Consultation comments by sector



# Consultations comments by topic



Based on pre-screening by ECHA  
Comments can cover more than one topic  
Allocation of some comments not possible

Partially new/updated information  
Additional uses identified  
Recurring topic: Fluoropolymers

# Processing of comments by the Dossier Submitter - 1

Hazard/Risks

Include new information submitted  
Consider whole lifecycle

New (sub)uses  
identified

Sub-uses added to existing uses if fitting  
New sectors will be included, partly covering  
(sub)uses previously addressed in other  
sectors

Other EU  
Regulations

Check interlinks with updated/revised  
regulations, e.g. revised F-gas Regulation

[https://www.reach-clp-biozid-helpdesk.de/SharedDocs/Meldungen/DE/REACH/2024-04-12\\_Rolle\\_Aktivit%C3%A4t\\_PFAS.html](https://www.reach-clp-biozid-helpdesk.de/SharedDocs/Meldungen/DE/REACH/2024-04-12_Rolle_Aktivit%C3%A4t_PFAS.html)

# Processing of comments by the Dossier Submitter - 2

Alternatives

Review of derogations incl. transition periods based on updated proportionality assessment

Other restriction options

Does information submitted in the consultation demonstrate that other means can address the identified risks over the whole lifecycle?

[https://www.reach-clp-biozid-helpdesk.de/SharedDocs/Meldungen/DE/REACH/2024-04-12\\_Rolle\\_Aktivit%C3%A4t\\_PFAS.html](https://www.reach-clp-biozid-helpdesk.de/SharedDocs/Meldungen/DE/REACH/2024-04-12_Rolle_Aktivit%C3%A4t_PFAS.html)

# Processing of comments by the Dossier Submitter - 3

## Socioeconomic impacts

Revise impact assessment

Present trade-offs between the different restriction options assessed (support to policy makers)

- Revision of the originally submitted proposal
  - Becomes „Background document“
  - Serves RAC and SEAC as basis for their opinion forming
- Response to comments (separate RCOM document)
  - Topic based

[https://www.reach-clp-biozid-helpdesk.de/SharedDocs/Meldungen/DE/REACH/2024-04-12\\_Rolle\\_Aktivit%C3%A4t\\_PFAS.html](https://www.reach-clp-biozid-helpdesk.de/SharedDocs/Meldungen/DE/REACH/2024-04-12_Rolle_Aktivit%C3%A4t_PFAS.html)



# Summary

- Currently main focus of DS: Assessment of comments
  - All comments taken into account
- Revision of dossier incl. Impacts, derogations, transition periods etc.  
=> background document (BD)
- BD serves as basis for RAC/SEAC opinion forming process
- Main aim remains **minimisation** of emissions
  - Other proposed risk management options are assessed if proposed
- Sector/use based approach
  - Publication of next sectors/uses on a regular basis by ECHA

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