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Dear valued customer,

I am writing to you regarding the REACH Annex XV restriction proposal on all Per- and polyfluoroalkyl substances (PFAS), which was submitted to ECHA on 13th January 2023 by 5 member states, namely Germany, the Netherlands, Denmark, Norway & Sweden.

The proposed restriction is the broadest restriction proposal in history. Whilst we fully support the restriction of PFAS of Concern that pose toxicological and/or environmental adverse effects, we also strongly oppose the inclusion of fluoropolymers in the dossier. We believe that fluoropolymers have been included in the dossier due to structural definition alone and have nothing in common in terms of toxicological and environmental risks which are associated with PFAS of Concern. According to the OECD (Organisation for Economic Co-operation and Development) standard, 96% of the global fluoropolymer market meet the criteria to be considered Polymers of Low Concern (PLC). We therefore feel that to include them in this dossier under the criteria of persistency alone is not satisfactory and will leave multiple critical industries with no suitable alternative materials.

Clwyd Compounders Ltd are committed to providing our customers with adequate solutions to problems that arise in all aspects of the ever-evolving elastomer industry where possible. We are confident that this proposal will present no exception for us in the service we provide to our customers.

Our technical team are currently in the process of testing and evaluating a number of fluoroelastomer samples which have been manufactured with non-hazardous PFAS chemicals (i.e., non-fluoro surfactants), working closely with our commercial team who are in regular contact with our trusted suppliers to provide you, our customer, with alternative tailor-made formulations which are free from hazardous PFAS chemicals.

If you have any further queries surrounding this matter, please contact reachrep@clwydcompounders.com however I would like to assure you, we are moving very quickly with this project and will be in regular contact with you as soon as we are in a position to offer you further information and discuss revised formulations with you.

Kind regards,

Michael Winrow

Technical Director



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