HOHENSTEIN

TECHNICAL BULLETIN PFAS

PFAS: The EU's New Restriction Proposal

ECHA's recently published restriction proposal represents the most comprehensive measure in European chemicals legislation to date and further increases pressure on the per- and polyfluoroalkyl (PFAS) group of substances, which has come under severe global pressure.

PFAS are used in a wide range of industrial and consumer applications: from water- and oil-repellent finishes for textiles or papers used in food packaging, to fire-fighting foams and paints, to the manufacture of semiconductors and chrome plating.
They can enter the environment during production, use, maintenance and disposal of products, where they remain due to their extreme persistence. From there, they can be absorbed by humans through drinking water or due to their ability to bioaccumulate in the food chain. In humans, PFASs have adverse health effects. They are associated with effects on the thyroid, endocrine system, liver, kidneys, and cancer formation, among others.

The group of PFAS is defined according to the OECD and covers approximately 10,000 different individual substances.
ECHA's proposal aims to limit the content of PFAS and thereby minimize their release into the environment and the exposure of humans.

Restrictions & Limit Values

The EU restriction will apply to substances, mixtures and articles. It will prohibit their production, placement on the market and use if the strict limits are exceeded:

- 25 µg/kg for any PFAS substance measured by target analysis. PFAS polymers are excluded from this.
- 250 µg/kg for the sum of PFAS substances measured by target analysis. PFAS polymers are excluded. However, chemical degradation is optional to convert precursors of PFAS.

In addition, a further limit value entails obligations to provide evidence:

- 50 mg/kg total fluorine (TF). If this value is exceeded, the manufacturer, importer or user must prove to the authorities on request whether the measured content originates from PFAS or other chemicals.

Limitations & Transitional Period

After the limitation comes into force, there will be an 18 month transition period. After that, it will only be possible to manufacture, place on the market or use PFAS in the EU in exceptional cases.

The **exemptions**, some of which are **limited in time**, will result in notification requirements and include the following products and applications:

- Category III personal protective equipment (PPE) ; until 13.5 years after entry into force
- Impregnating agents for the above PPE; until 13.5 years after entry into force
- Polymerization aids for PFAS polymers; until 6.5 years after entry into force

The restriction is expected to enter into force in **2025** following public consultations, scientific committee evaluations and the European Commission's decision. After the 18 month transition period, the restrictions are expected to be valid in 2027.

US Requirements

By this date, legal requirements will have already been enacted in several U.S. states. In California, for example, there will be a limit of 100 mg/kg for Total Organic Fluorine in textile products from 01.01.2025, which will be reduced to 50 mg/kg from 01.01.2027. Other states (Colorado, New York, Maine) have also enacted bans on mixtures and articles with intentionally added PFAS. Furthermore, limitation proposals are in progress in several other states.

Hohenstein Expertise & Contact

Hohenstein has many years of experience in testing a wide range of PFAS, including in very low concentration ranges. In addition, we perform analysis of the total content as well as the extractable content of fluorine - quickly and reliably.
We can therefore offer all the services you need to be ready today for the requirements of tomorrow.

If you have any requests regarding PFAS or related obligations, please contact our experts: customerservice@hohenstein.com
Learn more on our website.