



**Chemours™**

# Navigating the SEAC Consultation

13 April 2026

# Antitrust & Competition Laws

## DOs

*To ensure that no violation of competition law occurs in the context of a meeting, please observe the following together with the leader:*

### PREPARATION OF THE MEETING

- ✓ Agenda and meeting documents must not include issues relevant to competition law.

### DURING THE MEETING

- ✓ Discussions should be limited to the agenda topics that were sent in advance.
- ✓ Take minutes of the full meeting.
- ✓ In case of spontaneous statements relevant to competition law, you must react immediately and actively to dissociate yourself from the violation.
  - Point out to a participant that this issue must not be discussed.
  - If necessary, postpone the discussion until you have received relevant legal clarification.
  - If the discussion continues, notify your objection in the protocol, suspend the meeting or leave the meeting space. Any action taken in this regard must be recorded in the protocol.
  - Inform the legal counsel of your company about the incident.

### AFTER THE MEETING

- ✓ Minutes of the meetings should be short and straightforward.

## DON'Ts

*Employees of competing companies are not allowed to formally or informally discuss, exchange information or make arrangements regarding any of the following points:*

### PRICES, in particular:

- Pricing, price differences, and pricing strategies.
- Individual sales and payment terms; individual discounts, credits, and credit conditions.

### PRODUCTION, in particular:

- Individual production or sales costs, costing formulas, methods of cost calculation, costs of production, acquiring, inventory, sales, etc. of products or product groups.
- Changes in production, e.g. for maintenance or limiting the market supply of a product.

### TRANSPORTATION, in particular:

- Rates or rate policies for individual shipments, including basing point systems, zone prices, freight, etc.

### FUTURE MARKET BEHAVIOR, in particular:

- Plans of individual companies concerning technology, investment, design, production, distribution and marketing of certain products.
- Agreement on market allocation either geographically or by customers.
- Matters related to actual or potential suppliers or customers, particularly if this might have the effect of excluding them from any market or influencing business conduct of other companies toward them.
- "Blacklists" or boycotts of customers, competitors, or suppliers.

# Speaking Today



**Valentina Mauri**

*Senior Director, Global  
Strategic Advocacy*

*The Chemours Company*



**Dr. Jacques Ragot**

*Global Advocacy Director, Advanced  
Performance Materials and Thermal  
& Specialized Solutions*

*The Chemours Company*



**Rosanna Telesca**

*EMEA Sales Director, Advanced  
Performance Materials*

*The Chemours Company*

# Agenda

1. Understanding the Current Phase of the PFAS Restriction and Implications for Fluoropolymers
2. Key Conclusions of the SEAC Draft Opinion
3. What SEAC Will Evaluate
4. How to Participate: Surveys and Sectors
5. Structuring an Effective SEAC Submission
6. Q&A





# Understanding the Current Phase of the PFAS Restriction and Implications for Fluoropolymers

**Valentina Mauri**

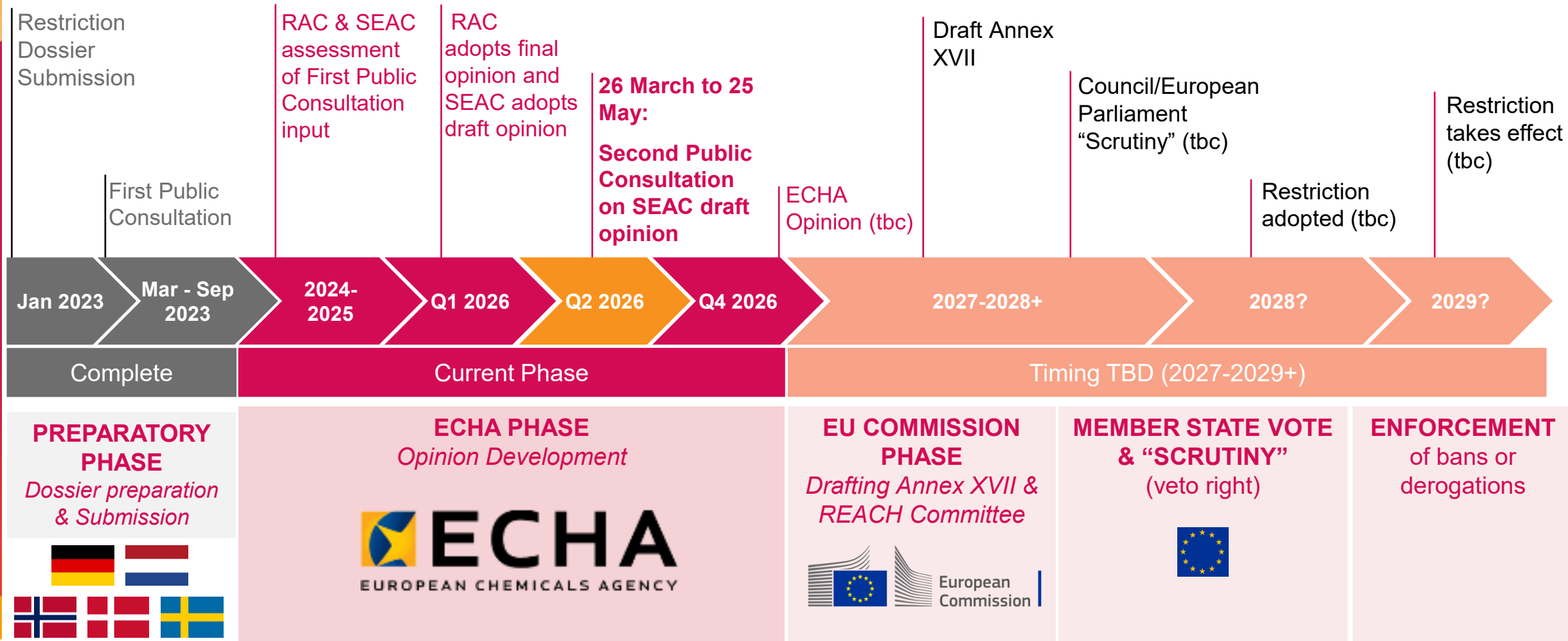
Senior Director, Global Strategic  
Advocacy

# Recap: The PFAS Restriction

- ❑ The scientific assessment by the European Chemicals Agency (ECHA) of the EU-wide restriction proposal on PFAS submitted by five European countries **is ongoing and scheduled to conclude in 2026.**
- ❑ ECHA has two committees in the restriction process: the Committee for Risk Assessment (**RAC**) and the Committee for Socio-economic Analysis (**SEAC**). These provide scientific and socio-economic opinions to ECHA, particularly on proposals for restrictions on hazardous chemicals and applications for authorization of certain uses of chemicals.
- ❑ The RAC [final opinion](#) and SEAC [draft opinion](#) support an EU-wide restriction, subject to specific derogations, on the manufacture, placing on the market and use of PFAS. **The Committees also recommend that any restriction should be complemented by effective measures to minimise emissions.**
- ❑ ECHA's committees assess and advise, **but it is the European Commission that ultimately decides the shape and adoption of the PFAS restriction under REACH.**

The SEAC consultation will examine whether a proposed PFAS restriction is socio-economically justified, proportionate, and workable, and whether impacts and availability of alternatives are fully and accurately assessed. This is why it is crucial that experts take part in the consultation.

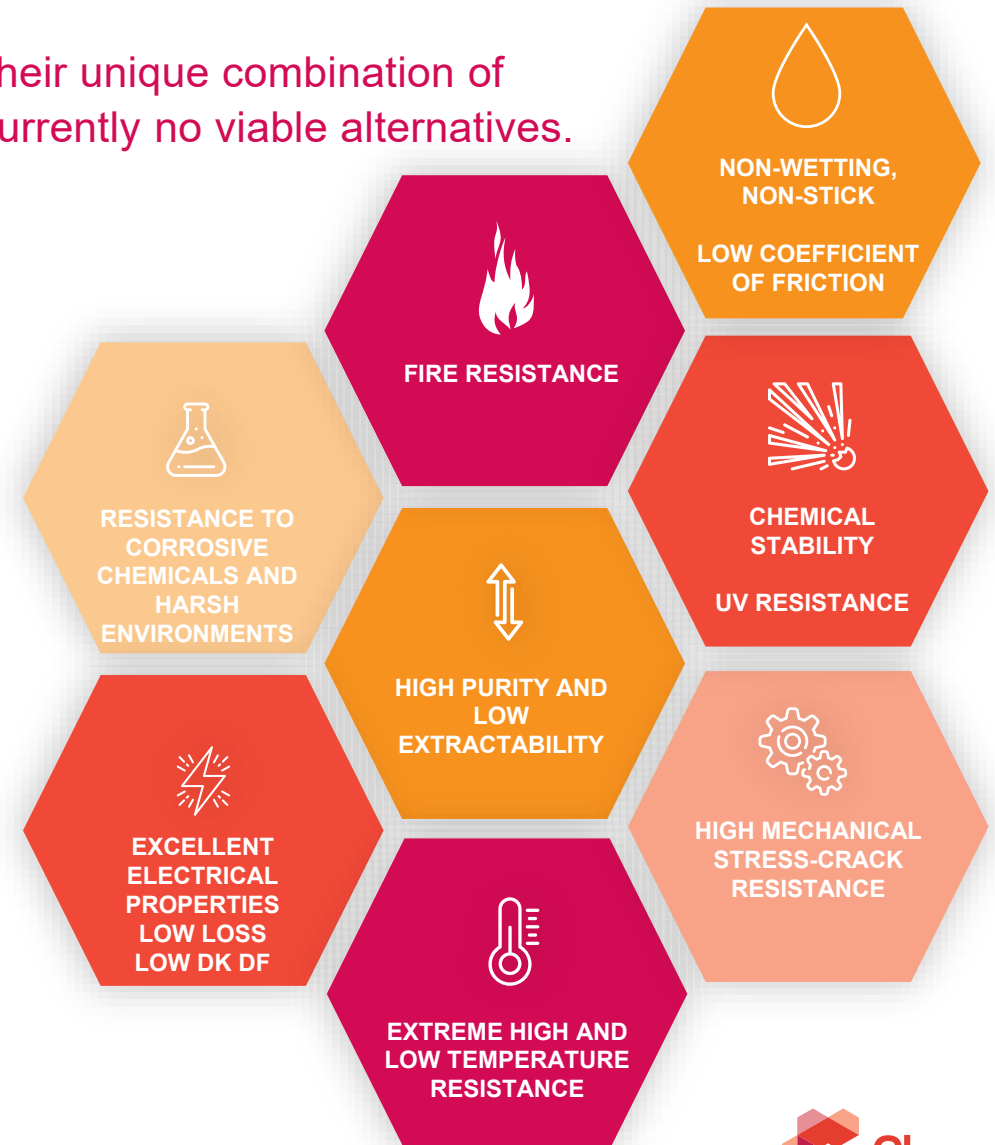
# EU PFAS Restriction Timeline



# Critical Materials for Critical Applications

Fluoropolymers are selected for critical applications because of their unique combination of properties. For many of the most critical applications, there are currently no viable alternatives.

- Unsurpassed protection against chemical permeation or attack, even under the harshest conditions
- Exceptional performance and durability across temperature and pressure extremes, for safer, more efficient transportation
- Enabling ultra-low-loss and high-speed data transmission, even at higher frequencies and temperatures
- Excellent chemical, thermal, and mechanical stability, plus tunable conductivity and low permeability – enabling the hydrogen economy, advanced electronics, semicon, xEV, chemical processing, and much more



# A Sustainable Solution: Regulate Emissions, Don't Ban Products

*A phase out of fluoropolymers will result in a gap in capabilities for innovation, products, and industries.*

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- To maintain Europe's industrial base, it is vital to make a distinction between PFAS categories to help **ensure a continued use of fluoropolymers under emissions control technologies**
- Continued use with **robust emission reduction strategies at production and waste management phases** is a pragmatic solution that addresses concerns on PFAS pollution while alleviating industry uncertainty.
- **Sustainable operations and proper end-of-life processes** will help ensure that both society and our planet thrive over the long term.

- ✓ Fluoropolymers play a strategic role in strengthening Europe's economy and autonomy
- ✓ Europe is a net exporter of fluoropolymers
- ✓ The value of fluoropolymers sold in the EEA in 2022 was € 1-3 billion
- ✓ They are used in almost all sectors and are critical in many
- ✓ They are safe for their intended uses

Source: FPG

# Industry in EU Commits to Responsible Manufacturing

In response to the evolving EU regulatory landscape, the Fluoropolymer Product Group (FPG) has united manufacturers under a [Voluntary Manufacturing Programme](#), committing them to the highest responsible manufacturing standards worldwide.

This initiative incorporates three core pillars:



Reduce non-polymeric PFAS emissions from fluoropolymer manufacturing



Enhance workplace & environmental safety for downstream users through the **Safe Handling Guide**



Create a **Technology Exchange Platform** to promote and share best practices with key stakeholders across the industry



Download your free copy of the [FPG Safe Handling Guide](#).

# Appeals for a pragmatic approach

## German Chemicals Agenda

On 26 March 2026, the German Federal Minister for Economic Affairs, Katherina Reiche, and the Federal Environment Minister, Carsten Schneider, [presented](#) the results of the National Chemicals Agenda.

**The Federal Government advocates for a risk-based, differentiated, and targeted approach regarding the various uses of substances and groups of substances (such as fluoropolymers) in the PFAS restriction procedure.**

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## Cefic (European Chemical Industry Council)

In Dec 2025, Cefic [presented an analysis](#) that the European chemical industry is going through a structural contraction, not just a cyclical downturn

# Appeals for a pragmatic approach

## The Antwerp Declaration, signed by 20 industry associations and 555 CEOs in 2024

Calling for a European Industrial Deal and restoring the business case for investing and producing in Europe.



## AmCham EU

Supports protecting human health and the environment but argues that the proposed universal PFAS restriction under REACH is overly broad, insufficiently risk-based, and could result in significant unintended consequences for EU competitiveness, innovation, and supply chains:

## ITRE Report

This is a Parliament-commissioned evidence study intended to inform political debate on the REACH PFAS restriction.

**Key findings** were that fluoropolymers are industrial enablers, essential for safety-critical, high-performance applications where substitution is often not feasible.

## FPG

The Fluoropolymer Product Group (FPG) proposes a complete and full exemption for fluoropolymer manufacture and uses based on the weight of scientific evidence and their critical role in the European economy:



# Key Conclusions of the SEAC Draft Opinion

**Dr. Jacques Ragot**

Global Advocacy Director  
Advanced Performance Materials  
and Thermal & Specialized Solutions

# Results of the First Public Consultation

The **First Consultation in 2023** allowed stakeholders to provide input on the original restriction proposal of the Dossier Submitters. *ECHA received more than 5,600 responses.*

- ✓ In August 2025 Dossier Submitters proposed extensive derogations for the manufacturing of fluoropolymers, *irrespective of whether fluorinated or non-fluorinated polymerization aids are used*, provided operations are under controlled conditions
- ✓ Additional extended derogations and alternative restriction options are included within the updated proposal here: [Updated PFAS restriction proposal \(Draft Background Document\)](#)



**Committee for Risk Assessment (RAC)**  
**Committee for Socio-economic Analysis (SEAC)**

## **Background Document**

to the Opinion on the Annex XV dossier proposing restrictions on  
**Per- and polyfluoroalkyl substances (PFASs)**

ECHA/RAC/[opinion number will be added after adoption]  
ECHA/SEAC/[opinion number will be added after adoption]

# Summary of Key Conclusions of the SEAC Draft Opinion

- A full ban (RO1) is likely not proportionate
- **Fluoropolymers: Critical but remain in scope**
  - Fluoropolymers are essential in critical applications with limited substitution options
  - SEAC does not support general exemption, citing life-cycle emissions concerns (mainly manufacturing and end-of-life)
- **Overall framework: Restrictions combined with use-specific derogations**
  - RO2 (5-12 years) may be appropriate for many uses, but are not sufficient or workable for all sectors
- **Targeted long-term derogations (RO3)**
  - For strategic sectors (notably semicon, PFAS manufacture) time-unlimited derogations may be proportionate
  - Conditional on strict emission-reduction measures
- **SEAC cannot quantify proportionality**
  - Significant data gaps prevent robust quantitative conclusions for proportionality, reinforcing the need for use-specific differentiation

Many key uses are not in initial sectors (1-15) but are part of sectors not yet assessed.

*For example:*

- Gaskets, O-rings, pipe linings in automotive are not in Transport but in Sealing Applications (~50% of total volumes of FPs and PFPEs used in EEA)
- Metered dose inhaler coatings & films for pharma stoppers are not in Medical Devices but in Other Medical Applications

# Example: Transport (E.2.10 of Annex E)

## The Transport Sector covers:

- ❑ Body, hull and fuselage construction
- ❑ Tubes and hoses in combustion engine systems
- ❑ Coatings, liners and finishes including protective coatings and paints hydrophobic coatings for windshields, Cable liners and coatings for transport vehicles, including high voltage insulators, FEP based heat shrink sleeving
- ❑ Additives in hydraulic fluids
- ❑ Mobile air conditioning (MAC) and heat pump systems
- ❑ Transport refrigeration
- ❑ Other transport uses e.g. flotation fluids in gyroscopes and compasses
- ❑ Mobile air conditioning (MAC)
- ❑ Transport refrigeration

## Other uses in Transport are covered in different sectors:

- Sealing applications
- Machinery applications
- Lubricants
- Metal plating
- Electronics and Semiconductors
- Energy
- Technical textiles
- Application of Fluorinated gases
- Explosives
- Spare parts

# Example of Nuanced Sub-uses

Question: Where would you place coatings used in metered dose inhalers?

Sector	Uses	Sub-Use
Medical Devices	Implantable medical devices	Fluorinated meshes
Medical Devices	Implantable medical devices	Other medical implants
Medical Devices	Invasive medical devices	Tubes and catheters
Medical Devices	Invasive medical devices	Vision applications
Medical Devices	Invasive medical devices	Other invasive medical devices, except tubes and catheters and vision applications
Medical Devices	Non-implantable noninvasive medical devices	Sterilisation gases
Medical Devices	Non-implantable noninvasive medical devices	Wound treatment products
Medical Devices	Non-implantable noninvasive medical devices	Coatings
Medical Devices	Packaging of medical devices	PCTFE in packaging of terminally sterilised and nonsterilised medical devices
Medical Devices	Packaging of medical devices	Polymer processing aids used in flexible plastic film extrusion for packaging of terminally sterilised and nonsterilised medical devices
Medical Devices	Packaging of medical devices	Waxes for inks and lacquers used on packaging of medical devices
Medical Devices	Other uses	

## Example of Nuanced Sub-uses (cont.)

Answer: None of the above

Other uses of PFASs are related to medical devices but are not (fully) within the scope of the sector. These uses are reported (fully or partially) in other parts of the Background Document, as follows:

- Excipients (e.g. propellants), immediate packaging and drug delivery devices are, along with the active pharmaceutical ingredients (APIs), part of an EU medicinal product authorisation, Regulation (EC) No 726/2004 (EC, 2004) and Directive 2001/83/EC (EC, 2001).
- Drug delivery devices (the device part of a drug-device combination product) include pressurized metered-dose inhalers (pMDIs), pre-filled syringes, pre-filled injection pens, autoinjectors and pre-filled on-body delivery system. Only the active pharmaceutical ingredients are covered by the time-unlimited derogation, see section A.3.24. and 2.2.3. of the main report. Therefore, the substances involved in the abovementioned uses are assessed in a separate use sector called 'other medical applications', see A.3.20. Transdermal patches are also covered in this sector.

# Addressing Uncertainties

SEAC finds that significant uncertainty remains about the restriction, largely because there is **insufficient data** on alternatives, their technical and economic viability, costs, benefits, and overall proportionality.

- It is therefore important to **address uncertainties in the SEAC draft opinion** (including the sector evaluations) for the sector(s) you operate in and in which you have the expertise.

## Examples of comments by SEAC on some uses:

- Use of coatings, liners and finishes in Transport: ‘SEAC could not determine the substitution potential’
- On the 13.5 years derogation for fuel cells and electrolyzers: ‘Likely justified: SEAC is however unable to conclude whether the derogation period of 13.5 years is justified.’
- In its assessment of the Electronics and Semiconductor sectors ‘SEAC has identified uncertainties regarding the analysis of alternatives as well as the socioeconomic analysis for several sub-uses assessed.’

Derogation proposed by the Dossier Submitter	Relevant topic/sector	SEAC's conclusion	Points for the decision maker to consider
Saa Industrial and professional uses of lubricants or lubricant additives until 13.5 years after EIF	Sector-specific evaluation: Lubricants	Could be justified.	While there are indications that a derogation for industrial and professional uses where PFAS-based lubricants are currently used may be justified, SEAC is unable to reach a definitive conclusion due to uncertainties in the cost assessment and the significantly reduced benefits associated with the derogation.  In case a derogation is supported by the decision maker, SEAC considers it appropriate that it refers to industrial and professional uses generally, due to the impossibility of defining harsh conditions in an objective way.



## What SEAC Will Evaluate

# Why a Second Consultation?

- The second consultation is a targeted exercise to close remaining socio-economic evidence gaps in the SEAC draft opinion. **The consultation is open to anyone, worldwide.**

*Despite extensive input in 2023, costs and impacts are aggregated at too high a level for several sectors and uses. SEAC is therefore asking for:*

- Sector- and use-specific socio-economic evidence
- Availability / feasibility / timing of technically viable alternatives
- EU volumes and tonnages linked to specific use
- Downstream and societal impacts
- Managing risks associated with the use of PFAS



**Previously submitted information may be referenced by citing consultation comment numbers from the first consultation (e.g. #1234, #5678).**

# What Will Be Evaluated?

**Socio-economic impacts of the proposed restriction** - assessing costs and benefits of restricting PFAS uses:

- Costs** for companies (compliance, reformulation, re-qualification, redesign, certification)
- Impacts on downstream users, consumers, and **society** at large
- Effects on competitiveness, innovation, supply chains and **critical value chains**

**Availability + feasibility of alternatives** - Are technically / economically feasible alternatives available for specific uses:

- Technical performance and **reliability** of alternatives
- Time needed to **develop, test, qualify and deploy alternatives**
- Risks of **substitution failure**
- Differences between **laboratory-scale substitutes vs industrial-scale feasibility**

**Appropriateness of derogations (use-specific exemptions)** - Are proposed derogations justified, including:

- Whether a **derogation is needed** at all for a given use
- Whether the scope of the **derogation is correctly defined**
- Whether the **duration of the derogation (time-limited or time-unlimited) is socio-economically proportionate**

# What Will Be Evaluated? (cont.)

**Transition timelines** – Do the proposed transition periods allow:

- ❑ **Sufficient time for substitution** and scale-up
- ❑ Re-certification and **regulatory approvals** (e.g., medical, electronics, aerospace)
- ❑ Avoidance of **disproportionate disruption or product withdrawal**

**Sector- and use-specific information** for the 14 original sectors + PFAS Manufacturing from the 2023 proposal:

- ❑ **Volumes of PFAS used + criticality of the use**
- ❑ Organizational and **societal impacts** of restriction, and consequences of loss of functionality

**Proportionality** - Based on consultation input, SEAC considers whether:

- ❑ The restriction option assessed is **the most appropriate EU-wide measure**
- ❑ Adjustments are needed to uses, derogations or timelines to **ensure proportionality**

SEAC will not reassess hazards or risks. Its focus is strictly socio-economic

# The Second (and Final) Consultation is Open

- ❑ The 60-day consultation on SEAC's draft opinion runs until **25 May 2026**. It is accessible via [EUSurvey](#), and you will need to set up multi-factor authentication using the EU Login mobile app.
- ❑ The consultation focusses on the socio-economic impacts of the proposed PFAS restriction, including job loss, substitution challenges, and data gaps. It is not a reopening of the original restriction proposal.
- ❑ This represents **the final structured opportunity for stakeholders to submit socio-economic evidence** before SEAC adopts its final opinion.
- ❑ SEAC's opinion is advisory, but it will play an important role in informing the European Commission's final decision on the PFAS restriction.

Your participation in this consultation is essential to support a proportionate outcome that safeguards health and the environment while preserving critical uses, innovation capacity, and EU competitiveness.




# How to Participate: Surveys and Sectors

# The SEAC Consultation Surveys

## ECHA's Guidance and PFAS Mapping

*It is highly recommended to read the following documents:*

- ✓ The SEAC Draft Opinion
- ✓ ECHA Guidance for Respondents
- ✓ ECHA's Mapping of PFAS uses to identify:
  - Sector
  - Sub-use
  - Application level assessed by SEAC
- ✓ Privacy Statement

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### 4. Survey questions

The tables below list each question in the two survey types, the available responses options and instructions for answering. Some of the questions will have conditional visibility, meaning they only appear when relevant based on your previous answers. For example, questions about organisation size or headcount do not apply to individual citizens. When responding to the surveys, you can access supporting information by clicking the ?-symbol next to the question text.

Mandatory questions are marked with an asterisk (\*) next to the question number.

**Table 1: Sector-specific survey questions**

#	Question	Response options	Instructions
1.0*	Select the EU language in which you will respond to the questions (the questions themselves will be in English only).	Single choice: List of EU languages.	
1.1*	Which of the following best describes you or your affiliation?	Single choice: 1. Citizen/individual 2. Organisation	Select Citizen/individual if you are responding in a personal capacity. Select Organisation if you represent an organisation (e.g. company) or other official role.

# Prioritized Sectors

These **15 sectors** are prioritized for targeted feedback, focusing on high-impact industries. Submit input through the [Sector-specific survey](#).

## PFAS - SEAC Draft Opinion Consultation

### Pages

Background and instructions

01. PFAS Manufacturing

02. Textiles, upholstery, leather, apparel and carpets (TULAC)

03. FCM and packaging

04. Metal plating and manufacture of metal products

05. Consumer mixtures and miscellaneous consumer articles

06. Cosmetics

07. Ski wax

08. Applications of fluorinated gases

09. Medical devices

10. Transport

11. Electronics and semiconductors

12. Energy

13. Construction products

14. Lubricants

15. Petroleum and mining

General Survey => [See next page](#)

# Sectors Not Assessed

These 8 additional sectors were brought into scope in the updated Background Document but were not assessed by SEAC. Submit input through the **General survey**.

- [16] *Printing applications*
- [17] *Sealing applications*
- [18] *Machinery applications*
- [19] *Other medical applications*
- [20] *Military applications*
- [21] *Explosives*
- [22] *Technical Textiles*
- [23] *Broader industrial uses*
- [24] **Other sector**

- If applications don't fit within any of the named sectors, use the "[24] Other Sector" category
- Comments will be collected by sector and consolidated. Therefore, keep sector terminology consistent throughout the submission.
- [The link for the General Survey can be found here](#)

# Structure of the Consultation

Fields marked with \* are mandatory.

- ❑ Many questions are pre-populated and require single, multiple choice, or numerical responses.
- ❑ Surveys do not allow attachments or tables. Links will not be opened by SEAC.
- ❑ Note the number of characters permitted (these vary between 100 to 5,000 characters). Prepare succinct drafts beforehand to avoid losing work
- ❑ Submit one survey per sector, if possible. If critical information exceeds character count, multiple surveys can be submitted
- ❑ If submitting for multiple uses or sectors, submit separate, tailored responses—this is explicitly allowed and encouraged.
- ❑ Use clear sector names and, where relevant, NACE codes.

## Question Types

- **Choice-based** (Single/Multiple Choice)
- **Numerical** (Numbers only)
- **Free text** (with varying character limitations)

Where SEAC states that evidence is insufficient or uncertain, **the burden is on stakeholders to add substance.**



# Structuring an Effective SEAC Submission

**Valentina Mauri**

Senior Director, Global Strategic  
Advocacy

# How to structure an effective submission

## Start from SEAC's mandate (frame your submission correctly):

- SEAC is not reassessing hazard (that is RAC's role). It is assessing whether the restriction options are proportionate, feasible, and justified from a socio-economic perspective.

Every section of your submission should answer one or more of these SEAC questions:

- What is the socio-economic impact of restricting this use?
- Are alternatives technically and economically feasible?
- Are the timelines realistic?
- Would restriction lead to disproportionate consequences relative to the risk addressed?
- Avoid generic statements of importance

**SEAC explicitly looks for use-specific, targeted socio-economic evidence.**

# Key Takeaways

How can you help shape a science-based and proportionate regulation that ensures a continued and safe use of Fluoropolymers?

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An effective SEAC submission is **use-based**, not substance-based.

- Sector (as defined in the SEAC opinion or survey)
- Specific use
- Where relevant, a sub-use (this is strongly encouraged and reflected in your survey templates and internal guidance)

## Example for General Survey:

- ✓ **Sector:** Industrial equipment
- ✓ **Use:** Sealing and gaskets
- ✓ **Sub-use:** High-temperature, chemically aggressive environments where failure leads to safety risks

Explain the **use of your application and why it exists**. Keep this concise. It sets context for the evidence that follows.

**Include:**

- The function performed by the PFAS/fluoropolymer
- The operating conditions (temperature, pressure, chemical exposure, lifetime)
- Where it sits in the value chain (manufacturing, downstream application)

If warranted, **explain the limitations of alternatives**

**Include:**

- A clear explanation of performance requirements
- How alternatives fail (durability, safety, compliance, reliability)
- If alternatives exist only in theory, lab scale, or niche contexts

Socio-economic impacts of restriction. **This is the heart of the SEAC submission.**

**Cover, where relevant:**

- Impacts on jobs, SMEs, and regional value chains
- Downstream impacts (customers, critical sectors)
- Safety, health, or environmental trade-offs from substitution
- Risk of production relocation or supply disruption

Risk management and existing controls - **SEAC looks at whether risk is already managed.**

- Emission controls
- Closed systems
- Worker protection measures (OSH, SHG)
- Compliance with existing REACH requirements

## Proportionality and recommended outcome:

Conclude each use-based submission with a clear, SEAC-relevant ask, such as 'continued use under certain conditions'.

## Availability and feasibility of alternatives.

- Alternatives assessed (material or technology)
- Technical feasibility (yes/no/partial)
- Economic feasibility (cost increases, requalification, redesign)
- Time needed for substitution (if at all)



Following this webinar, we will send you the presentation as well as additional material that can help you understand current data gaps. All submissions need to be in by **May 25<sup>th</sup>, 2026**.



## Q&A

# Rosanna Telesca

EMEA Sales Director, Advanced  
Performance Materials



## Appendix

Links to papers mentioned in this presentation and other useful information

# Detailed assessment on some of the sectors

Sector	Current SEAC position on derogations	Our analysis of SEAC's view
Electronics	<ul style="list-style-type: none"> <li>• <b>Limited substitution is feasible</b> - only in less demanding applications (e.g., low-/mid-temperature wire insulation); most core electronics uses (e.g., PCBs, RF components, photonics, coatings, anti-drip additives) show low substitution potential and continued PFAS dependence.</li> <li>• Derogations (mostly ~12 years) are therefore considered necessary to avoid performance loss, safety risks, and supply disruptions.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Most Fluoropolymer applications in electronics are recommended for a time-limited derogation               <ul style="list-style-type: none"> <li>➤ Except low/mid temp wire and cable though SEAC acknowledges that it would be difficult to separate from other wire and cable applications (e.g., connectors)</li> </ul> </li> </ul>
Semicon	<ul style="list-style-type: none"> <li>• <b>Alternatives exist only for a limited subset of less demanding uses</b>; for nearly all semiconductor applications, no technically and economically feasible PFAS-free alternatives are currently available that meet performance, reliability, purity, and safety requirements.</li> <li>• <b>Where substitution may be possible</b>, qualification, redesign, and certification timelines are long (~5–25 years) and associated costs are high, with major uncertainty remaining for several sub-uses (e.g. semiconductor equipment beyond lithography tools).</li> <li>• <b>A conditional, potentially time-unlimited derogation (RO3) with strict risk-management measures is considered also likely justified and proportionate for semicon manufacturing, with implementation uncertainties</b></li> </ul>	<ul style="list-style-type: none"> <li>➤ <b>Alternatives are not available and not realistically available in the foreseeable (future 5-25+ years)</b></li> </ul>
Energy	<ul style="list-style-type: none"> <li>• <b>Low or uncertain substitution potential applies to batteries, hydrogen technologies (fuel cells &amp; electrolysers), and chemical electrolysis</b>, where PFAS are often technically critical and alternatives are immature or unproven.</li> <li>• <b>SEAC disagrees with the DS and finds there to be sufficiently strong evidence for high substitution potential for uses in PV panels</b></li> <li>• <b>SEAC cannot conclude overall proportionality for a ban with time-limited derogations (RO2), but considers derogations likely justified for batteries and hydrogen applications; proportionality for other uses cannot be assessed due to missing data.</b></li> </ul>	<ul style="list-style-type: none"> <li>➤ <b>SEAC lacks the basis to evaluate the benefits of RO3</b></li> </ul>

# Cont.

Sector	Current SEAC position on derogations	Our analysis of SEAC's view
Lubricants	<ul style="list-style-type: none"> <li>• <b>For Industrial &amp; professional uses</b>, substitution potential is <b>low</b>; no alternatives currently match PFAS performance under harsh conditions (extremes of temperature, pressure, chemicals, radiation, lifetime).</li> <li>• Health and safety related costs are potentially significant in cases where applications requiring PFAS-based lubrication cannot function effectively.</li> <li>• A <b>12-year derogation for industrial/professional uses</b> may be needed for proportionality, but <b>SEAC cannot reach a definitive conclusion</b> due to cost and benefit uncertainties.</li> </ul>	<ul style="list-style-type: none"> <li>➤ RO3 has not been considered by DSs</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• <b>Low substitution potential for safety-critical sub-uses</b>, including combustion-engine tubes and hoses</li> <li>• <b>Substitution potential cannot be determined</b> for several sub-uses, such as aerospace hoses, aircraft and high-voltage cable coatings, antifouling and anti-icing coatings, and hydraulic fluids in non-aerospace machinery, with general indications that polymeric PFAS remain necessary for safety and environmental performance.</li> <li>• <b>Derogations are likely justified</b> for specific sub-uses, notably type-approved vehicle systems/components (e.g. fuel systems, critical cabling) and PFAS in aerospace hydraulic fluids to avoid disproportionate safety, supply, and socio-economic impacts.</li> </ul>	<ul style="list-style-type: none"> <li>➤ ECHA was unable to conclude whether RO3 is proportionate</li> </ul>
Medical Devices	<ul style="list-style-type: none"> <li>• There is <b>strong evidence for low substitution potential</b> for implantable devices (e.g., glucose monitors) and invasive devices (e.g., tubes and catheters) and no alternatives currently meet MDR and clinical requirements.</li> <li>• A <b>restriction with targeted, time-limited derogations (RO2, typically 12 years)</b> is <b>more likely to be proportionate</b>, while still achieving substantial PFAS emission reductions.</li> </ul>	<ul style="list-style-type: none"> <li>➤ RO3 was not considered by DSs</li> </ul>
Construction	<ul style="list-style-type: none"> <li>• <b>SEAC cannot conclude on substitution potential</b> because the evidence base is weak.</li> <li>• SEAC does not accept claims that PFAS are <b>generally indispensable</b> for fire-safety additives, plumbing applications; available information suggests alternatives may work in some applications, but SEAC lacks sufficient technical detail to identify where substitution fails.</li> <li>• SEAC cannot <b>establish or endorse clear derogations</b> for these sub-uses and stresses that more precise scoping and application-specific evidence would be <b>required</b> to justify exemptions on proportionality or safety grounds.</li> </ul>	<ul style="list-style-type: none"> <li>➤ RO3 was not considered by DS</li> </ul>

# Cont.

## Food Contact

- SEAC disagrees that substitution potential is **generally low** for non-stick coatings in industrial bakeware, citing weak evidence for high substitution potential overall, but weak evidence for low substitution potential for certain unspecified operations
- The Dossier Submitter proposed 5-year derogations for non-stick coatings in industrial bakeware. SEAC is **unable to conclude whether these derogations are justified** to ensure proportionality, due to high uncertainty on costs, ~~alternatives~~ and impacts

➤ ~~RO3~~ was not considered by DS

# Technical Tips and advice from ECHA

- Only information submitted within the 60-day consultation window will be considered.
- Submit early: Do not wait until the final day as high traffic near deadlines increases the risk of technical issues
- Take proof of submission by saving Confirmation screen (PDF or screenshot) and the Automated confirmation email

**Note: Submissions are strongest when they show real-world consequences and suggest practical risk management options.**

- Be very concise, specific, and focused on SEAC's remit to make effective contributions.
- Assessments should align with EU objectives like sustainability, innovation, simplification and competitiveness.
- When submitting your expertise: keep in mind proportionality & marginal benefit
- Collect your data before submitting to the consultation: Quantified data is strongly preferred, but well-substantiated qualitative evidence is also accepted.

# Handling Confidential Business Information

## Marking Confidential Content

- Clearly mark confidential business information and provide a non-confidential summary for public sharing whenever possible.

## Justifying Confidentiality

- Provide clear reasons why the information is sensitive and how its disclosure could harm the business interests.

## Transparency and Specificity

- Be transparent and specific in confidentiality claims

## Avoid Over-classification

- Avoid over-classifying information as confidential to maintain the impact and effectiveness of submissions.

## Common mistakes to avoid

- ✗ Addressing hazard or risk (RAC topics) instead of socio-economic impacts
- ✗ Submitting advocacy statements without evidence
- ✗ Uploading data without explanation or context
- ✗ Incomplete submissions

Note: Unjustified confidentiality claims may be rejected by the regulatory bodies.

# Getting Started

**Remember: Many questions are pre-populated.**

The choice-based questions (single/multiple choice) are largely fixed by ECHA/SEAC. These reflect SEAC's draft opinion structure and their preliminary assessments.

In sector-specific surveys, SEAC has already pre-filled the framing of each sub-use, reflecting:

- How the dossier submitters described the use, and
- SEAC's current assessment of evidence and confidence => You are therefore reacting to their assessment
- The surveys mirror the exact sections of the SEAC draft opinion, so the questions themselves are effectively "locked" to those sections.

# Getting Started

Note: Free text are not pre-filled

This is where SEAC explicitly expects:

- agreement (with justification),
- disagreement (with evidence), or
- additional data to reduce uncertainty.
- **Numerical questions** (costs, volumes, timelines, impacts) are entirely respondent-driven.
- **Provide factual and evidence-based information:** Detailed, evidence-based input will strengthen the case for continued use where justified.

# Please consider responding to the proposed reporting requirements and site-specific PFAS management plan

**Paragraph 7: Reporting requirements** are proposed to apply only to uses with 12 year or time unlimited derogation

Manufacturers, importers of PFASs or PFAS containing articles as well as downstream users formulating PFAS-containing mixtures to report on a yearly basis

- i. the derogation that the intended use belongs to;
- ii. the identity and quantity of the substances placed on the market in the previous year

**Paragraph 8:** Manufacturers, importers and downstream users of fluoropolymers and perfluoropolyethers making use of any of the derogations in paragraphs 5 or 6 shall establish a **site-specific management plan** to include:

- information on the identity of the substances and the products they are used in
- a justification for the use;
- details on the conditions of use and safe disposal.

The management plan to be reviewed annually and kept available for inspection by enforcement authorities upon request.

## Helpful Links

[Link to EU Survey](#)

[Link to the General Survey](#)



### Summary

- The consultation runs for 60 calendar days from 26 March to 25 May 2026. The consultation will close at 23:59 Helsinki time (EEST/UTC+03).
- The consultation is open to all interested parties, including industry representatives, non-governmental organisations, producers and developers of alternatives, researchers and members of the public.
- All responses are to be submitted through EU Survey. ECHA and SEAC do not accept responses sent through any other channel, unless specifically requested.
- You can mark individual question responses as confidential. Confidential information will be available to the ECHA secretariate and SEAC, but it will not be published.
- A Privacy Statement is available in the individual surveys.

# RAC Opinion and SEAC Draft Opinion

## RAC Final Opinion:

<https://echa.europa.eu/documents/10162/d6aac737-e665-cbae-58c8-17780de44bd5>

## SEAC Draft Opinion:

<https://echa.europa.eu/documents/10162/9ecfb76d-6e69-c047-3228-16c78e42897f>

Before starting your submission(s), please refer to ECHA guidelines and extensive mapping of PFAS uses here:

=> [Per- and polyfluoroalkyl substances \(PFAS\) - ECHA](#)

=> [ECHA on SEAC Guidance for Respondents](#)

=> [PFAS Use Mapping Tool](#)

=> [Updated PFAS restriction proposal \(Background Document\)](#)

=> [ECHA's Q&A - All news - ECHA](#) + [ECHA's Privacy Statement](#)



# Other Useful links

[The German Chemical Agenda](#)

[ITRE Study \(summary\)](#)

[ITRE Study \(full study\)](#)

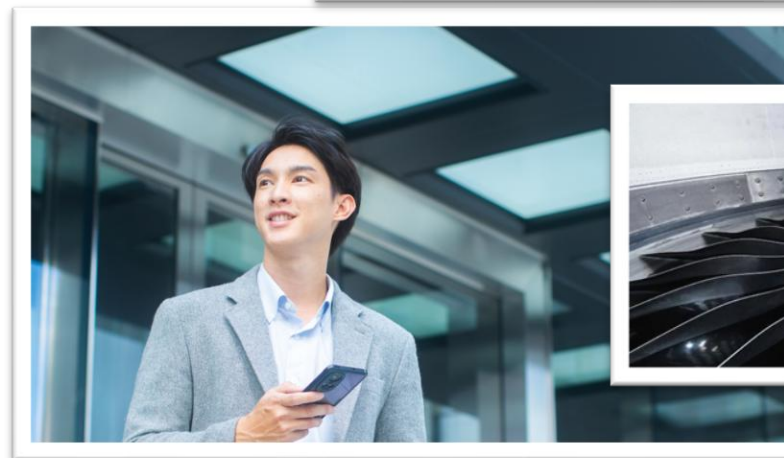
[Cefic Report: European Chemical Closure Investments Radar 2022-2025](#)

[AMCHAM EU](#)

[FPG Manufacturing Programme](#)

[The Fluoropolymer Safe Handling Guide](#)

[FPG Position Statement](#)



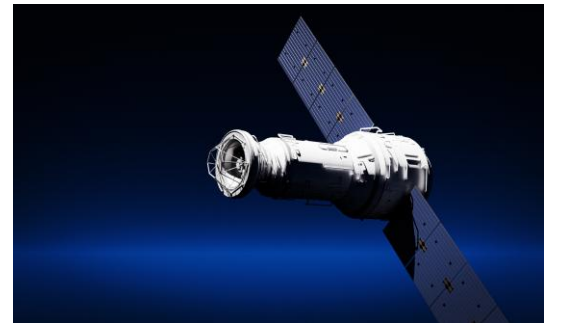
# Helpful Links (continued)

## FPG 2025 Webinars: Presentations available online

- Slides from FPG's September 2025 webinar on the Manufacturing Programme are available here: [8-Sept-2025-FPG-presentation-for-Webinar.pdf](#)
- Slides from the FPG October 2025 Safe Handling Guide webinar available here: [20-Oct-2025-FPG-SHG-Webinar.pdf](#)
- Slides from the FPG November 2025 webinar on the Medical Sector (including Case Studies) available here: [FPG-Webinar-18th-Nov-Fluoropolymers-Essential-for-Europes-Medical-and-Pharmaceutical-Sectors.pdf](#)
- Slides from the FPG March 2026 Webinar on Electronics/Semiconductors available here: [Fluoropolymers: Essential for Europe's Digital Economy.](#)

## FPG Future Webinars

You can keep track of FPG's upcoming webinars via: <https://fluoropolymers.eu/>



# European Industry Summit in Antwerp

In July 2025, the European Commission presented the European Chemicals Industry Action Plan to support the chemical sector and their investments on modernisation. The Action Plan highlights the key role of the chemical industry as the “**industry of industries**” and proposes a series of measures to boost its competitiveness.

A key element of the Action Plan is the creation of a [Critical Chemicals Alliance](#) bringing together the Commission and stakeholders and tackle the main challenges affecting the sector.

In February 2026, the European Industry Summit brought together over 500 business leaders under the auspices of Belgian Prime Minister Bart De Wever, with German Chancellor Friedrich Merz, French President Macron, Dutch Prime Minister Dick Schoof, Austrian Chancellor Christian Stocker, and EU leaders including European Commission President Ursula von der Leyen and Executive Vice Presidents Teresa Ribera and Stéphane Séjourné.

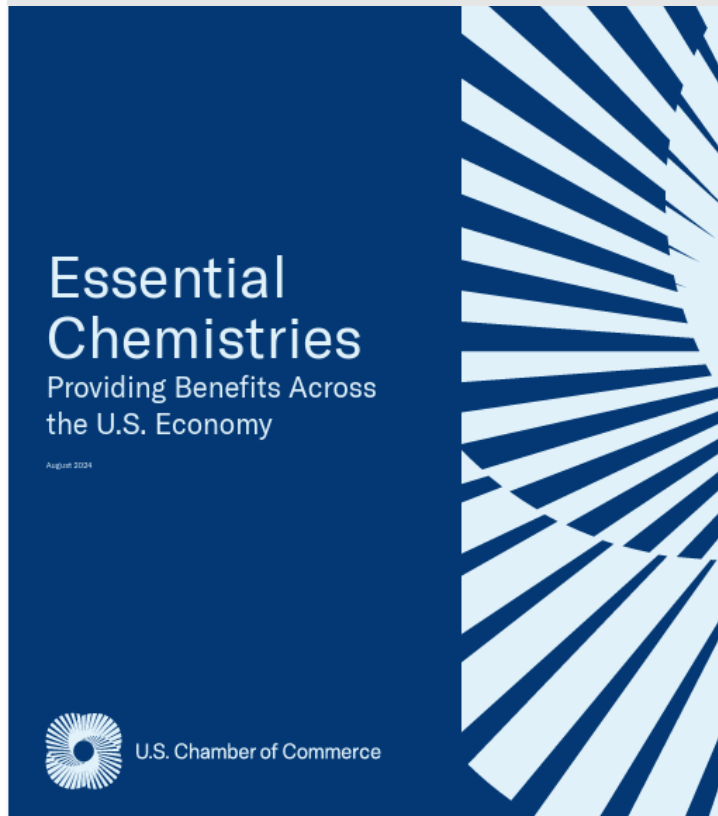
All 27 EU heads of state and government were encouraged to adopt emergency industrial policy measures at their informal European Council retreat.

[Outcome of the 12 February 2026 EU leaders' competitiveness retreat.](#)



# Fluorinated Chemicals, Including Fluoropolymers, Play an Important Role in Many Industries – US studies

*These chemistries add significant value to the U.S. economy, which is highlighted by the lack of available replacements in these sectors, with most viable alternatives, if feasible, projected to take 5 to 20 years to develop and implement.*



*“Losing access to PFAS due to overly broad regulations or severe market contractions would greatly impact national security and DoD’s ability to fulfill its mission, and impact domestic defense industrial base manufacturing and supply.”*

## Report on Critical Per- and Polyfluoroalkyl Substance Uses

Pursuant to Section 347 of the James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 (Public Law 117-263)



August 2023

Office of the Assistant Secretary of Defense for Energy, Installations, and Environment

Office of the Assistant Secretary of Defense for Industrial Base Policy

The estimated cost of this report or study for the Department of Defense is approximately \$63,000 in Fiscal Year 2023. This includes \$47,900 in expenses and \$45,100 in DoD labor.  
Generated on 2023/07/18. RefID: 1-2287342

*“The unique properties of fluoropolymers make them long-lasting, stable, and resistant to chemical or biological breakdown, while still being light-weight and adaptable. Fluoropolymers enhance the durability, safety, and longevity of a wide range of products”*



# End of Life and Alternatives Assessment

FPG is also looking at emissions at end of life, and alternatives to fluoropolymers:

## Ensuring Sustainable End-of-Life Management

- Provide an assessment of fluoropolymer EoL management, framing it within the full EU waste hierarchy, which includes waste prevention, recycling, thermal destruction, and landfilling.
- Address gaps in information, as existing literature regarding fluoropolymer waste streams, incineration, and recyclability is currently fragmented and not fully up to date.

## Assessment of Alternatives (AoA)

- Evaluate the availability and technical and economic feasibility of alternative materials or processes that could potentially replace fluoropolymers.
- The report aims to highlight diverse fluoropolymer applications and outlines key factors such as research, supply chain cooperation, and extensive testing needed when assessing and introducing alternative materials.

More information available via: <https://fluoropolymers.eu/>

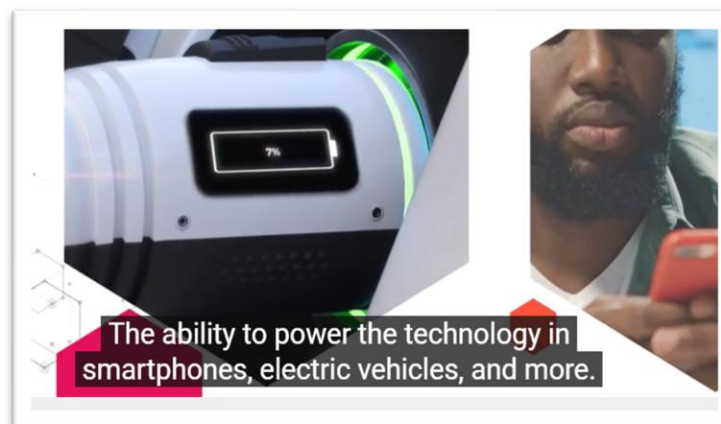
# If you missed the Chemours Webinar 'Fluoropolymers: Foundational To The European Economy' on 4 February

You can revisit key insights here: [Fluoropolymers\\_Foundational To The European Economy\\_FINAL.pdf](#)

See Chemours' approach to the responsible manufacturing of fluoropolymers:

[Download our White Paper](#)

[Watch our video](#) to learn how advanced analysis and emission controls help enable sustainable fluoropolymer production.



**Thank You**

