

Per- and polyfluoroalkyl substances (PFAS) substances

Dear Sir or Madam,

Thank you for your inquiry regarding the implementation of the substance-specific topic of per- and polyfluoroalkyl substances (PFAS) in our company, on which we comment as follows:

Background/proposal for the restriction of PFAS:

As part of the EU sustainability strategy for chemicals, the Commission 2020 is presenting a comprehensive package of measures to regulate the substance class of per- and polyfluoroalkyl substances (PFAS). The declared aim is to restrict the use of PFASs and the marketing of products containing PFASs in the EU as far as possible.

The European Chemicals Agency (ECHA) published a dossier on the comprehensive restriction of perfluorinated and polyfluorinated alkyl substances (PFAS) on March 22, 2023 and launched the public consultation (restriction dossier ECHA). The restriction aims to restrict or ban the production, placing on the market and use of all PFASs on their own or in mixtures and articles. PFAS are all substances containing at least one fully fluorinated -CF₂ - or -CF₃ - group (without any H/Cl/Br/I atom attached to it). The scope of the restriction proposal covers more than 10,000 substances. The main uses are textiles (rain jackets, special protective equipment, e.g. fire suits), in food contact (e.g. pizza boxes, Teflon pans), in fire-fighting foams but also in e.g. lubricants. All PFAS are either persistent themselves ("eternal chemicals") or are degraded to persistent PFAS (e.g. PFCAs, TFA, etc.). PFASs remain in the environment for decades and can affect humans and the environment or cause adverse effects. Under the CLP regulation only single PFAS substances are classified in a harmonized way (e.g. PFOS), under the REACH regulation there is a candidate list with 10 PFAS entries.

For some weeks now, the restriction proposal on PFAS has received a lot of public attention. There is currently no legal obligation to notify or provide information. Internally, we have intensified our efforts on the subject of PFAS in the company processes (e.g. development, purchasing, production) and are currently determining how we are affected in any processing procedures or how PFAS in our products are affected (e.g. through corresponding PFAS coatings).

We therefore ask for your understanding that, within the framework of our legal compliance principle, i.e. compliance with the relevant environmental regulations, we are currently also complying with the associated, relevant regulations (e.g. ChemG, REACH-VO), but no separate information is available on PFAS substances.

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As soon as we have identified relevant information, we will communicate this accordingly.

We hope that the above information gives you a satisfactory impression of our efforts to include PFASs in our business.

If you have any further information on the subject of substance policy, please do not hesitate to contact us.

Yours sincerely

Hommel+Keller Präzisionswerkzeuge GmbH



Sigmund Grimm
CEO