

# Analytical Service for per- and polyfluoroalkyl substances (PFAS)

TÜV Rheinland LGA Products - Information

February 2023

Five EU national authorities, including the Netherlands, Germany, Denmark, Norway and Sweden, submitted a restriction proposal in January 2023 to ban the production, use and placing on the EU market of all per- and polyfluoroalkyl substances (PFAS).

On February 7, 2023, ECHA published the proposed Annex XV Restriction Report, which in its current version would be one of the largest chemical bans in Europe if adopted.

The Annex XV Restriction Report<sup>1</sup> and all supporting documents are available on the [ECHA website](#).

What makes PFAS partly indispensable are unique physical properties such as water and grease repellent, the ability to reduce friction and high thermal and chemical stability, which make them suitable for a wide range of different applications.

Because of these unique properties, PFAS are used in numerous products / processes, such as:

- Heat resistant non-stick coatings
- Food packaging
- Stain resistant textiles and carpets
- Cosmetics
- Surfactants in electroplating (chrome plating),
- Fire extinguishing foams
- Production of semiconductors or
- Photographic processes.

## ANNEX XV RESTRICTION REPORT RESTRICTION

- I. 25 ppb for any PFAS as measured with targeted PFAS analysis (polymeric PFASs excluded from quantification)
- II. 250 ppb for the sum of PFASs measured as sum of targeted PFAS analysis, optionally with prior degradation of precursors (polymeric PFASs excluded from quantification)
- III. 50 ppm for PFASs (polymeric PFASs included). If total fluorine exceeds 50 mg F/kg the manufacturer, importer or downstream user shall upon request provide to the enforcement authorities a proof for the fluorine measured as content of either PFASs or non-PFASs.

<sup>1</sup> <https://echa.europa.eu/restrictions-under-consideration/-/substance-rev/72301/term>

## WHAT WE CAN DO FOR YOU?

TUV Rheinland offers a wide range of analytical services to detect the intentional and unintentional use of PFAS in products and mixtures enabling manufacturer brands, retailers, and suppliers to comply with the existing and upcoming legal obligations under EU and U.S. laws.

<b>Package 1</b>	Covers existing restriction for the EU market (including ORRChem - Switzerland)
<b>Package 2</b>	Covers upcoming restriction in the EU market (PFHxA)
<b>Package 3</b>	Overview target analysis by LC/MS and GC/MS (~ 100 PFAS)
<b>Package 4</b>	Total fluorine content (applicable REACH PFAS Ban, U.S. state law requirement)

		Package 1	Package 2	Package 3	Package 4
Legislation		180,- Euro	220,- Euro	300,- Euro	140,- Euro
PFOA and related compounds	POP Annex I Part A	•	Package 1	Package 2	
PFOS and its derivatives	POP Annex I Part A	•			
PFHxS and related compounds	Swiss ORRChem*	•			
C9-C14 PFCA and related compounds	REACH Annex XVII	•			
PFHxA and related compounds	Proposal REACH		•		
PFAS Add-on (additional > 20 PFAS)	REACH PFAS Ban**			•	
Total Fluorine Content	REACH PFAS Ban** U.S. State law***				•****

\* Switzerland - Official Collection 2022 162 (RO 2022 162), PFHxS restriction applies as of October 1, 2022

\*\* REACH Annex XV Restriction proposal

\*\*\*e.g. California AB 1817 or California AB 1200

\*\*\*\* Further testing suggested in case of total fluorine detection, not included in the package

## OUR RECOMMENDATION

The analytical examination which products contain PFAS can be seen as the first and mandatory step in order to identify suitable substitutes, and to improve the affected products accordingly.

Besides the analytical testing, it is also suggested to monitor the supply chain with regard to the usage of chemicals. A review and further development can be carried out, for example, on the basis of production site audits on chemical and/or wastewater management (textile or electroplating industry), which are additional measures to eliminate PFAS from the production.

Companies who decide not react to the recent developments should at least prepare a process enabling them to respond in a timely manner to authorities or inquiries from NGOs.

Further information on current legal changes can also be found on our homepage at [www.tuv.com](http://www.tuv.com) or <https://www.tuv.com/regulations-and-standards/en/>.

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