Industrieverband
Halbzeuge und Konsumprodukte
aus Kunststoff e.V.

pro-K Städelstraße 10 60596 Frankfurt am Main

To the kind attention of

Mr. Martin Beekman – Netherlands	restrictiePFAS@rivm.nl
Dr. Mandy Lokaj – Germany	ChemG@baua.bund.de
Ms. Jenny Ivarsson – Sweden	Jenny.Ivarsson@kemi.se
Mr. Toke Winther – Denmark	towin@mst.dk
Mr. Audun Heggelund – Norway	Audun.heggelund@miljodir.no
Mr. Mark Blainey – ECHA	Mark.blainey@echa.europa.eu

September 23, 2021

Subject: PTFE/Fluoropolymers used in cookware applications
Reference: PFAS - Registry of restriction intentions until outcome (RoI) dated 15th July 2021

Dear Sir or Madam,

pro-K Industrieverband Halbzeuge und Konsumprodukte aus Kunststoff e. V. (pro-K) represents manufacturers of semi-finished products and consumer products made of plastic. It demonstrates the application possibilities and performance properties of plastic, and actively promote the image of plastic and its products. The members of pro-K mainly focus on processing of Fluoropolymers, part manufacturing and its applications, the involvement of downstream users in PFAS process.

Importance of fluoropolymers in cookware applications:
Fluoropolymers are the material of choice for food contact products and they impart unparalleled performance to these articles for end users. Non-stick properties of fluoropolymers in cookware applications have many advantages such as less energy consumption during manufacturing as well as during use, less requirement of water and detergent for cleaning of cookware coated with fluoropolymers, less usage of fat during cooking, no or reduced consumption of carcinogens or harmful substances generated by blackening of food as fluoropolymer coated articles prevent sticking.*

Concerns on use of fluoropolymers in cookware applications
Based on our interaction with various stakeholders, we believe that main concern of regulators is the presence of PFAS in fluoropolymers (mainly PTFE) used as non-stick coating in cookware applications. Traces of PFAS may be present in fluoropolymer coating due to their use as a polymerization aid in the manufacturing of fluoropolymer. Although, according to FEC, any residual non-polymeric PFAS are eliminated in the curing step at high temperature under controlled manufacturing processes, and there will not be any significant exposure of PFAS to consumers.

*2020-August-PFAS-Position-Paper.pdf (fecassociation.eu)

Städelstraße 10
60596 Frankfurt am Main

Telefon: +49 69 271 05 31
E-Mail: info@pro-kunststoff.de
www.pro-kunststoff.de

Trägerverband des GKV

Kunststoff
Werkstoff des 21. Jahrhunderts

Industrieverband
Halbzeuge und Konsumprodukte
aus Kunststoff e.V.

Remedial industry initiative

Initially, PFOA was used as a polymerization aid for the production of PTFE used in cookware industry. As the concerns regarding presence of PFOA in the PTFE coating on cooking pans increased, the use of PFOA was substituted by other fluorinated polymerization aids (mainly C-6 fluorinated compounds). Regulators are now concerned by the use of PFOA alternatives which are also fluorinated compounds. pro-K believes that main concern of authorities is the use of fluorinated polymerization aids and not the fluoropolymer itself. We believe that regulators would like fluoropolymer manufacturers to stop using fluorinated polymerization aids to control its emissions to the environment. pro-K feels that the use of non-fluorinated polymerization aid technology for the production of fluoropolymers intended to be used as coatings for cookware is a sustainable solution that should allay the concerns of regulators on fluoropolymers in such applications. Different end-of-life scenarios such as collection and controlled recycling of frying pans at suitable temperature conditions that ensure the fluoropolymer compounds get mineralized to calcium fluoride (CaF_2).

Therefore, pro-K would like to understand from authorities if the cookware industry shifts to fluoropolymers produced without the use of fluorinated polymerization aids, would this be considered as an environmentally sustainable solution to rest all the concerns on PFAS emissions related to use of fluoropolymer non-stick coating in cookware applications?

Considering irreplaceable benefits of fluoropolymers in cookware industry and the industry addressing concerns of regulators and understanding possible solutions to allay those concerns, pro-K strongly recommends to regulators **to consider offering a proactive derogation to the use of fluoropolymers produced by non-fluorinated polymerization aid technology for use in cookware applications**.

With kind regards

Ralf Olsen
Managing Director

Dr. Michael Schlipf
Chairman Fluoropolymergroup

Städelstraße 10
60596 Frankfurt am Main

Telefon: +49 69 271 05 31
E-Mail: info@pro-kunststoff.de
www.pro-kunststoff.de

Trägerverband des GKV

Kunststoff
Werkstoff des 21. Jahrhunderts