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INFORMATION LETTER TO SUPPLIERS ON REACH- RESTRICTION FOR PERFLUOROCTANOIC ACID (PFOA) FROM AUTOMOTIVE REACH TF EXPERTS (Brussels, 14/07/2016)

Many vehicle components need oil-, water- or dirt-repellent surfaces and/or a high hydrolysis or acid resistance. These properties can often be achieved only by fluorocarbon-containing coatings.

Due to their persistent, bioaccumulative and partially toxic for reproduction properties long chained perfluorinated chemicals have become more and more subject to restrictions and prohibitions. In particular, the long-chained perfluorinated acids (chain length C8, C9, C11 – C14) were already classified as SVHCs and were included in the REACH candidate list. The existing gap (perfluorodecanoic acid (PFDA), C10) will be closed soon.

For perfluorooctanoic acid (PFOA), its salts and PFOA related substances, additionally a REACH Annex XVII restriction is intended, which will be adopted soon. The last draft provides a maximum concentration of 25 ppb for PFOA and its salts and 1000 ppb for PFOA related substances materials in articles or parts thereof. The placing on the market of non-compliant articles should be prohibited 18 months (opinion of RAC) or 36 months (opinion of SEAC) after the entry into force of the restriction. The defined concentration limits are to ensure that impurities do not lead to a ban of other material groups, but intended use of these substances is prohibited.

Parallel to these activities PFOA, its salts and PFOA related substances will be included into Appendix A, B or C of the Stockholm Convention for Persistent Organic Pollutants (POP).

Most suppliers producing relevant articles, like waterproofed convertible roofs or PTFE-coated seals, no longer use PFOA or other long-chained perfluorinated chemicals. If PFOA, its salts or PFOA related substances are still used intentionally, these substances should be substituted – also with regard to the upcoming legal requirements – at the earliest opportunity.

For C8-chemicals such as PFOA, in most cases short-chained perfluorinated chemicals (e.g. C6-chemicals) are available as suitable alternative materials. For production of PTFE and other fluorine polymers, PFOA-free emulsifying agents are available.

However, due to current activities of some European Member States, it must be feared that the current substitutes (e.g. C6-/C4-chemicals or the PFOA-free emulsifying agents) will also be regulated as the long chained perfluorinated substances. If new alternatives have been developed or tested, it is recommended to consider these current activities and the possible regulatory outcome.



What does this mean to me?

All perfluorooctanoic acid (PFOA), salts and PFOA-related substances that are present in your products at above the threshold of 25 ppb should be declared in IMDS.

The Global List of Declarable Substances (GADSL) currently has a reporting threshold of 0.1% for PFOA related substances. The next revision of GADSL will cover the new legal requirements for these substances and the lower declaration threshold.

A non-comprehensive list of relevant CAS numbers is provided in the background documents for the proposed PFOA restriction (<http://echa.europa.eu/previous-consultations-on-restriction-proposals/-/substance-rev/1908/term>).

If you are still using automotive parts that contain perfluorooctanoic acid (PFOA), its salts or PFOA-related substances, please contact your customer as soon as possible, to understand their requirements.
