

To the President of the European Commission  
Ursula von der Leyen  
Rue de la Loi 200 / Wetstraat 200  
1040 Bruxelles / Brussel  
Belgien

by mail: Ursula.VON-DER-LEYEN@ec.europa.eu

### **Support for the PFAS restriction proposal at EU level**

Dear Madam President,

We are writing to you to emphasise the urgent need for strong support for the restriction of PFAS – “forever chemicals” - at EU level. The persistent and toxic properties of PFAS pose a serious risk to humans and the environment, which is why a comprehensive regulation of this group of substances is essential.

The restriction proposal, which was drawn up by five European states, provides for sensible transitional arrangements for applications where no alternative solutions are yet available - including applications in the medical sector and technologies for the energy transition. This shows that the proposal is both ambitious and practicable. We cannot understand the demand of some interest groups to exclude fluoropolymers from a restriction. The potentially low risks described with some fluoropolymers in the use phase are not an argument for exempting fluoropolymers from regulation in view of the risks during production and disposal.

In order to enable the transition to a PFAS-free future, it is essential that the EU Commission shows a clear course that promotes the development of safe alternatives to PFAS. At the same time, a discussion on the future and sustainable transformation of the chemical sector is needed, in which civil society should also be involved. This will also help to make the phase-out of PFAS transparent and collaborative.

Together with all the undersigned groups and civil society organisations, we ask you to support an undisturbed continuation of the evaluation of the universal PFAS



restriction proposal in its unchanged form, so that a significant and timely reduction in PFAS emissions can be achieved.

Yours sincerely

Olaf Bandt  
Chairman

Attachment

## Background information on PFAS

The PFAS substance group, which comprises more than 10,000 individual substances, is characterised by its particular longevity. They therefore accumulate in the environment and spread all over the world. PFAS, which contaminate drinking water and humans and do not degrade in the environment for decades or even centuries, are particularly critical. The problems that already exist will therefore increase for our children and grandchildren if the discharge of these substances is not stopped by regulation.

Five European countries have submitted a PFAS restriction proposal according to which the PFAS substance group is to be restricted. Applications for which there are no available alternatives according to current knowledge will be given extended transitional periods. ECHA's scientific committees are currently evaluating this welcomed proposal, which implements the 'Chemicals Strategy for Sustainability' - a key element of the EU Commission's Green Deal.

PFAS are problematic not only because of their longevity, but also because some of them are toxic, accumulate in organisms (bioaccumulation) and are mobile in soil and groundwater, so that they threaten the quality of drinking water and endanger human health. Links to several health impacts have been found, such as damage to the immune system, carcinogenic effect on kidneys and testicles, damage to the liver and thyroid gland, damage to foetuses in the womb, some of which potentially occur even at very low concentrations. The European Food Safety Authority (EFSA) has therefore set the tolerable weekly intake dose for the sum of four PFAS of particular concern at 4.4 billionths of a gram per kilogramme (ng/kg) of body weight. As monitoring studies in the blood of EU citizens show, this value is often exceeded. It should also be emphasised that this guideline value has been reduced by a factor of more than 1,000 over the past ten years as knowledge of the risks of PFAS has increased.

In addition, PFAS are not completely destroyed during waste incineration and PFAS in paper and plastic waste jeopardise established clean recycling routes. Across Europe, there are around 23,000 sites contaminated with PFAS. The remediation of contaminated sites and the cleaning of contaminated soil and water require enormous efforts and financial resources. Some of the affected soils have not been authorised for agricultural use for decades. Surface and groundwater containing PFAS can only be used as drinking water - if at all - by means of complex purification processes. According to conservative estimates, the health costs caused by PFAS in Europe and the USA already amount to €40-80 billion each year and region. These burdens increase with every additional PFAS released into the environment. The successful billion-euro claims for damages in the USA against companies such as 3M, DuPont and Chemours shows the seriousness of this situation.

Numerous scientific studies provide a clear picture. Regulation of PFAS is urgent! One example is a scientific review article<sup>1</sup> from last year which lists more than 500 references for the problem of PFAS.

---

<sup>1</sup> Brunn H, Arnold G, Körner W, Rippen G, Steinhäuser KG, Valentin I (2023), <https://enveurope.springeropen.com/articles/10.1186/s12302-023-00721-8>

Instead of a protective regulation for the entire PFAS substance group, as supported by the scientific community, some industry stakeholders are asking for each and all applications to be examined substance by substance. The individual assessment of more than 10,000 PFAS is unrealistic and would delay regulatory action during decades, during which thousands of tonnes of these highly persistent chemicals would continue to be released into the environment every year - with unforeseeable risks for future generations. PFAS therefore require an assessment approach based on the risks of the entire substance group, as proposed by the authors of the dossier and which already has been applied by the experts of the ECHA Risk Assessment Committee, for example in the restriction of all PFAS in fire-fighting foams.

Only critical applications that are harder to substitute should be granted longer transition periods. This construction of the PFAS restriction provides a clear impetus towards innovation, which is urgently needed in this area. Critical applications - such as in the medical sector - will remain possible.

Some interest groups are calling for fluoropolymers to be exempted from regulation. These are fluorinated plastics such as polytetrafluoroethene (PTFE, Teflon®). Apart from the fact that some of these polymers have problematic properties, all fluoropolymers are associated with significant environmental and health impacts, especially in the production phase (including significant emissions of non-polymeric PFAS) and the waste phase (in which decomposition to low molecular weight, problematic PFAS can take place). The potentially low risks associated with some fluoropolymers in the use phase are not an argument for exempting fluoropolymers from regulation, given the risks associated with production and disposal. The claims made by some industry associations that these risks in the life cycle have been resolved are not scientifically documented. On the contrary, recent scientific publications document PFAS emissions associated with the production of fluoropolymers<sup>2</sup>.

There is no doubt that there are several industrial applications of polymeric PFAS that are also of great importance for further technological development in the EU in terms of a sustainable transformation and currently appear indispensable. These substances can be easily integrated into ECHA's existing regulatory approach by granting them a temporary extension of the transitional period until the restriction comes into force, which allows and promotes the (further) development of more environmentally friendly alternatives. However, applications for which alternatives are already available should be banned quickly.

Due to the great and potentially underestimated risk of PFAS for health and the environment, it is essential to involve civil society and science in the further political discussion on this topic.

---

<sup>2</sup> Dalmijn et al. 2023 - <https://pubs.rsc.org/en/content/articlelanding/2024/em/d3em00426k>

## Scientists supporting this letter:

Prof. Dr.rer.nat. Hubertus Brunn

Prof. em. Dr. Andreas Schäffer

Dr. Juliane Glüge

Professor Ian Cousins

Professor Hans Peter Arp

Dr. Lisa Skedung

Prof. Dr. rer.nat. Christoph Schäfers

Associate Prof. Amalie Timmermann

Ph.D. student Zaya Gerili

Assistant Prof. Tue Kjærgaard Nielsen

Dr. Johanna Kramm

Prof. Dr. Beate Escher

Prof. Eva C. Bonefeld-Jørgensen

Danish Society of Occupational & Environmental Medicine, Chair of Board of Directors: Dr. Harald W. Meyer

Associate Prof., Ph.D. Xenia Trier

Prof PhD Lisbeth E. Knudsen

Prof. Philippe Grandjean

Prof. Dr. Dr. h.c. Henner Hollert

Prof Luisa Orsini

Dr. Leonard Böhm

Assistant Prof, Dr. Gabriel Sigmund

Prof. Dr. Jörg Oehlmann

Prof. Dr. Rita Triebkorn

Prof. Dr. Heinz Köhler

Dr Mohamed Abdallah

Dr., PhD, Jakob Bønløkke

PhD, Esben Meulengracht Flachs

Dr. Francisco Sylvester

Associate Prof. Sandra Søgaard Tøttenborg

Ph.D. student, Ida Asta Olsen

Dr Nanna Eller

Dr. Gerd Rippen

Dr. Hanna Joerss

Dr. Ksenia Groh

Dr. Michael Schümann

Priv.-Doz. Dr. Wolfgang Körner

Prof. Dr. Markus Brinkmann

Prof. Dr. Markus Große Ophoff

Danish Soc. for Public Health Med. Vice Chair of the Board Ann Lyngberg

Dr. Kris Hansen

**Civil Society organisations supporting this letter:**







Additional NGOs:

- ReteGas Vicentina
- Générations Futures
- Hogar sin Tóxicos
- World Future Council
- Plastic Change
- Bond Beter Leefmilieu
- Swedish Outdoor Association (Friluftsrämjandet)