

Malagnino, 20.11.2025

## PROPOSAL FOR RESTRICTION ON PFAS SUBSTANCES

Dear Customer,

Since 2020, five competent authorities from Germany, the Netherlands, Sweden, Norway, and Denmark have been working on defining a proposal to limit the production, import, and use of PFAS substances (perfluorinated and polyfluorinated alkyl substances) in the countries of the European Union.

This restriction proposal was submitted on January 13, 2023, to ECHA (European Chemicals Agency), which then initiated a Public Consultation to determine its applicability. The first phase of consultations concluded on September 25, 2023, and currently, the matter is in the hands of the scientific committees for Risk Assessment (RAC) and Socio-Economic Analysis (SEAC) of ECHA to determine a definitive position of the Commission and thus formulate a proposal to be submitted for scrutiny by the European Parliament, which will decide if and which restrictions will be applied.

From what we understand, it is evident that the situation is far from being defined and, therefore, there is no regulatory obligation to which we currently must comply regarding this topic.

Considering, furthermore, that it is not yet known which of these "Universal PFAS" will be subject to possible restrictions/exemptions and especially what type of limitation they will undergo (e.g., limits to be respected, prohibitions...), what we can declare is the following:

1. The current European regulatory framework prohibits the use and placing on the market of some subfamilies of PFAS (non-polymeric) through the REACH Regulation and the POPs Regulation.

More concrete examples are:

- PFOA, APFO, PFHpA, PFOS and its derivatives: They present a hazard classification in the CLP Regulation.
- PFOA, PFOS, PFHxS: They are prohibited, as they are present in Annex I of the POPs Regulation.
- PFCA C9-C14: Included in Annex XVII under entry No. 68 of the REACH Regulation.
- PFNA and PFDA (as well as their sodium and ammonium salts): On December 17, 2015, and January 12, 2017, respectively, they were included in the list of SVHC substances to be included in Annex XIV of Regulation (EC) No. 1907/2006 (REACH).

Furthermore, PFNA and PFDA, as well as their sodium and ammonium salts, are also listed in Annex VI, Part 3, of Regulation (EC) No. 1272/2008 of the European Parliament and of the Council as carcinogens of category 2 and toxic for reproduction of category 1B.

- PFHxA: Included under entry No. 79 of Annex XVII of the REACH Regulation.
- HFPO-DA: Included as an SVHC substance in the Candidate List of the REACH Regulation.
- PFBS: Included as an SVHC substance in the Candidate List of the REACH Regulation.

2. The restriction proposed by the 5 Member States would concern, if approved, also polymeric PFAS, within which we find fluoropolymers, namely polymers with fluorinated side chains and perfluoropolyethers.

Among the most known and used, we mention PTFE, PVDF, FEP, PFA, and FKM; therefore, we can affirm that some of our products may contain the materials mentioned above.

By the end of 2026, the opinions of RAC and SEAC will be combined into a single opinion and sent to the European Commission.

It is also expected that the European Commission will adopt the regulation for the restriction in question during 2027.

To date, we are not aware of any materials on the market that provide the same performance in terms of temperature resistance and inertness toward the processes they come into contact with. For this reason, in products intended to operate under the most severe conditions or where we must guarantee absolute passivity toward the monitored processes, we have had to choose components that also contain long-chain polymers that could be considered PFAS precursors.

Italcoppie Sensori, aware of the impact that the use of such substances could have on the environment, especially in the disposal and end-of-life phase, is active in the search for new solutions and materials, in collaboration with our suppliers.

Thank you and kind regards,

Italcoppie Sensori s.r.l