PFASs Survey for end users of fluorine containing products or fluorine free alternatives

Dear participant,

thank you for registering to this survey.

Data use and data safety

The data you are providing will be exclusively used for the purpose of generating a restriction proposal under REACH and will be only disclosed in an aggregated form. No organisation names will be linked to the data provided. As there is a certain need to clarify supply chains under REACH to be able to understand economic effects of a regulatory measure, the data is not anonymised upon your entry. This survey is hosted by Limeservice GmbH Barmbeker Str. 7a, 22303 Hamburg, Germany in accordance with § 9 of the German Federal Data Protection Act.

Using and sharing the questionnaire

The survey is supported by a dynamic questionnaire: Depending on the information you are providing and your answers, there might be specific follow up questions. Therefore, we understand, that it might be necessary that you need to interrupt the completion process to gather more information in your organisation. You can, at any time, interrupt the process and safe already filled in data (which is not submitted to us at that time) by using the **"Resume later"-button** on the bottom of each page.

You can also share the link to the survey with other colleagues in your company if you like them to enter additional information. If they follow your link to the survey, they are able to access the survey directly (without further registration). Your colleagues can also safe their entries with the "Resume later"-button and inform you or other colleagues that they have provided their input.

There is also the option for some questions to use Excel-sheets to upload data that might exceed our database capacity. This might be suitable for you to be able to extract the data in an editable way from standard IT Systems in place in your organisation.

Your feedback

This survey is also a pilot to make better use of IT-supported data collection with regard to regulatory processes such as REACH. It is the aim to minimise the efforts to be taken for completing such a survey and to evaluate the submitted information. Therefore we kindly ask you to give us some feedback on this questionnaire and your experiences with the tool at the end.

We thank you for your contribution.
On behalf of the survey team,

Olaf Wirth (Ökopol)

Any questions regarding this survey? Please contact:

Ökopol – Institut für Ökologie und Politik GmbH | Dr. Olaf Wirth | Nernstweg 32-34 | 22765 Hamburg, email: chemie@oekopol.de | www.oekopol.de/en

Chapter 1: Process specification and substances used

Please indicate, in which process/es you are using products, that contain fluorinated substances (e.g. textile treatment, paper production, etc.) or their fluorine free alternatives, the products name/s, your approximate consumption volume of the product that contains the fluorinated substance and its technical function/s in your process (e.g. anti foaming agent, surfactant).

If you perform more than 5 processes, that are relevant you can also use the Excel-Sheet that can be downloaded here.

	Process 1	**Process 2**	**Process 3**	**Process 4**	**Process 5**
Type of process:					
Product used in process:					
Additional identifier:					
Technical function of product:					

When you specify your information, please use the product and article categories as defined by the ECHA Use descriptor system and the also contained list of technical functions https://echa.europa.eu/documents/10162/13632/information_requirements_r12_en.pdf

Please specify the type of the processing aid.

○ product with fluorinated substance/s

○ product with fluorine free alternative substance/s

Substance specification

Please seperate with a (,), if you use several fluorinated substances in one product.

	Process 1	**Process 2**	**Process 3**	**Process 4**	**Process 5**
Substance/s name/s:					
Chemical group/s of substance/s:					
Consumption volume/units per year:					
CAS-Number/s:					
Other identifier/s:					
Concentration/s [w/w]:					
Concentration/s range min [w/w%]:					
Concentration/s range max [w/w%]:					

	Process 1	Process 2	Process 3	Process 4	Process 5
Technical function/s :					

Chapter 2: Information on end use processes and potential emissions

Please indicate, how the uses are performed in your organisation. Describe the fate of the fluorinated compounds through your processes (select everything that applies) and indicate substance(s), name(s) and number of days/batches per year.

Please choose all that apply and provide a comment:

☐ continuous production (every day) with a consumption volume above 10 t per day

_____

☐ continuous production (every day) with a consumption volume above 1 t per day

_____

☐ continuous production (every day) with a consumption volume above 100 kg per day

_____

☐ continuous production (every day) with a consumption volume above 10 kg per day

_____

☐ continuous production (every day) with a consumption volume above 1 kg per day

_____

☐ continuous production (every day) with a consumption volume below 1 kg per day

_____

☐ batch production with a production consumption above 10 t per event

_____

☐ batch production with a production consumption above 1 t per event

_____

☐ batch production with a production consumption above 100 kg per event

_____

☐ batch production with a production consumption above 10 kg per event

_____

☐ batch production with a production consumption above 1 kg per event

_____

☐ batch production with a consumption volume below 1 kg per event

_____

Other: _____

Is it possible, that PFASs are emitted from the process (even in traces)?

○ Yes

○ No

Depending on your answer, additional information on potential emissions will need to be provided!

Please provide some information on potential pathways how fluorinated substances can leave your manufacture process (apart from the product itself). Please choose all that apply. You have the possibility to provide additional Information on the individual pathways (e.g. typical concentrations (ranges), established risk management).

Please choose all that apply and provide a comment:

☐ The fluorinated substances are leaving the process via waste water (either from the process itself or via cleaning procedures of the establishment), please indicate concentrations of the substance(s) in the waste water if data is available: _____

☐ The fluorinated substances do enter sludge in waste water treatment plants. Please indicate sludge concentration: _____

☐ The fluorinated substances do remain in water in in waste water treatment plants. Please indicate water concentration in the outflow: _____

☐ The fluorinated substances are contained in either liquid or solid waste, please provide additional information on waste streams and subsequent treatment (waste codes, landfill, incineration, etc.):

_____

☐ Some fluorinated substances are emitted via off air, please indicate off air concentration [mg/m³]:

_____

Other: _____

Please include reasoning, why you assume no release.

Please choose **all** that apply:

☐ No water contact (also in maintenance and cleaning) _____

☐ PFASs enter hazardous waste that is subsequently incinerated _____

☐ Some fluorinated substances are decomposed under the conditions of the process. Please indicate these decomposition losses below

_____

☐ Other: _____

Please describe the risk management measures, that effectively retain the PFASs:

Please write your answer here:

_____
_____
_____

Chapter 3: Information on a potential socio economic impact of an envisaged REACH restriction

What is the annual turnover of your company?

○ < 100.000 €

○ ≥ 100.000 – 500.000 €

○ ≥ 500.000 – 1. Mio €

○ ≥ 1 – 10 Mio €

○ ≥ 10 - 100 Mio €

○ > 100 Mio €

How many employees does your company currently employ?

○ < 50 employees

○ < 250 employees

○ ≥ 250 employees

What is the relative share of your products, that contain or are produced with fluorinated substances on the overall turnover?

○ < 5 %

○ 5 - 20 %

○ 20 - 50 %

○ 51 - 80 %

☐ 81 -95 %

☐ > 95 %

What is the relative share of the fluorine free alternative products on the overall turnover?

☐ < 5 %

☐ 5 - 20 %

☐ 20 - 50 %

☐ 51 - 80 %

☐ 81 -95 %

☐ > 95 %

What are the production costs when fluorinated substances are used compared to their non fluorinated alternatives (if there are any)?

☐ more than 25% less costs than the fluorine free alternative

☐ somewhat less costs than fluorine free alternative (11-25%)

☐ about the same (+/- 10%)

☐ somewhat higher costs than fluorine free alternative (11-25%)

☐ more than 25% higher costs than the fluorine free alternative

How would you evaluate the substitution potential for fluorinated substances?

Please choose the appropriate response for each item:

	Possible but with some efforts	**Substitution would lead to complete reorganisation of business**	**Not possible, no alternatives**
economically	☐	☐	☐
technically	☐	☐	☐

Please indicate, in which areas substitution can be realised:

Please write your answer here:

_____

_____

How much time would you need to substitute completely to fluorine free alternative substances?

- ○ Substitution possible in less than 1 year
- ○ Substitution possible in 1-2 years
- ○ Substitution possible in 2-5 years
- ○ Substitution possible in 5-10 years
- ○ Substitution possible in more than 10 years
- ○ Substitution not possible at all

What would be your costs to completely substitute the fluorinated substances with fluorine free alternatives?

- ○ less than 0.1 million €
- ○ 0.1 - 1 million €
- ○ 1 - 10 million €
- ○ more than 10 million €

Indicate range

Chapter 4: Evaluation of the restriction proposal

How do you evaluate the general need to continue the use of PFASs?

Please write your answer here:

_____

_____

Do you agree with the following statements?

Please choose the appropriate response for each item:

	fully agree	agree	disagree	fully disagree
PFASs are a high risk for the environment	○	○	○	○
Uses should be restricted, even if no alternatives are available	○	○	○	○
PFASs should be restricted in all consumer uses	○	○	○	○
PFASs should be restricted in all professional applications	○	○	○	○
PFASs should be allowed in very specific applications with high relevance for the society	○	○	○	○

If you agreed to the last statement can you please describe applications that might qualify for such exemptions and give further reasoning

Please write your answer here:

_____

_____

What are main obstacles for substitution of PFASs?

Please write your answer here:

_____

_____

Do you want to provide any other aspect in regard to the envisaged restriction proposal, you can provide these aspects in the text box below or upload a document in standard format (word, PDF).

Please write your answer here:

_____

_____

Feedback

We might have some follow up questions to specify your answers in more detail. Do you agree, that we contact you for a potential follow up interview?

Yes

No

Thank you very much for participating in this survey. We tried to make this survey as efficient and as easy-to-use as possible. However, we still strive for improvement with regard to any future surveys which aim at contributing relevant information to potential restriction proposals under REACH.

In order to identify an improvement potential, we would like to use your feedback to this survey. Please provide your feedback in the text field below.

Please write your answer here:

_____
_____

_____
_____

Thank you for your efforts. In case of any questions, please contact Olaf Wirth (chemie@oekopol.de).