

PFAS SURVEY FOR MANUFACTURER

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 save 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 save 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:

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Chapter 1: Information on Substances handled by your organisation

Which fluorinated substances are manufactured? Please indicate the average manufactured tonnage (as average or as range per year) and - as far as possible - the product(s), technical function(s) and use(s) of the specific substance. Please specify all other fluorinated Substances in the same way.

If you manufacture more than 5 substances, you can also use the [Excel-Sheet](#) that can be downloaded here.

	Product 1	Product 2	Product 3	Product 4	Product 5
Substance name:					
CAS-Number:					
Additional identifier:					
Tonnage average value [kg/year]:					
~ Tonnage min [kg/year]:					
~ Tonnage max [kg/year]:					
Technical function/s of the substance:					
Products the substance is used for (this can comprise substances incl. polymers, mixtures or articles - for intermediate uses please indicate the resulting substance/polymer):					
Known technical function(s) of the substance:					
Known uses the substance is used in:					

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

Chapter 2: Information on manufacturing process

Please indicate how the manufacture process is performed in your organisation 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 production volume above 10 t per day

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

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

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

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

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

batch production with a production volume above 10 t per event

batch production with a production volume above 1 t per event

batch production with a production volume above 100 kg per event

batch production with a production volume above 10 kg per event

batch production with a production volume above 1 kg per event

batch production volume below 1 kg per event

Other: _____

Are there potential emissions from the manufacturing process of the substance? Please specify additional information below.

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 of 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.

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 %

Does your product portfolio cover fluorine free substances, that could replace the manufactured PFASs in your supply chains? 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 differences in the production costs, when fluorinated substances are manufactured 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
technically	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Uses should be restricted, even if no alternatives are available	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
PFASs should be restricted in all consumer uses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
PFASs should be restricted in all professional applications	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
PFASs should be allowed in very specific applications with high relevance for the society	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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:

If 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).