

General Comments

Dear Ladies and Gentlemen in ECHA,

The Japan Fluorocarbon Manufacturers Association (JFMA), represents some of the leading domestic Fluorocarbon Manufacturers. We welcome the opportunity to submit our opinion to the public consultation on all poly- and perfluoroalkyl substances (PFAS).

Our organization strongly request to include all f-gases into 4. in Condition of restriction because f-gas has been already regulated by (EU) No 517/2014 so called f-gas regulation. We understand the reason why listed a. thru c. at 4. in Condition of restriction have already been covered by other EU regulation (EU) 528/2012 for a., (EC) 1107/2009 for b. and (EC) No 726/2004, (EU) 2019/6 & Directive 2001/83/EC. These derogation for a. thru c. is to avoid double regulation for the substances. Both F-gas Regulation and PFAS Restriction proposal have the same objective, which is emission reduction. In the context of F-gases, there is already a strong regulatory framework to control and reduce emissions of F-gases, both at European and global level. Therefore, F-gases should not be included in the scope of the universal PFAS restriction, and the F-gas regulation should be considered as the regulatory tool to control emissions.

For f-gas is also covered by (EU) No 517/2014 to reduce the substance in the market with set schedule. In addition, f-gas regulation is under review of revision to restrict further including prevention of leakage, which contribute to reduce emission during usage in the market and end-of-life stages. Furthermore, reclamation and destruction practices are going on in EU market for the recovered f-gas at maintenance and end-of-life, which are also contributing to achieving circular economy for important materials in the society like f-gases.