Göteborg, April 2025

Points for the Roundtable discussion on PFAS in the Standing Committee on Infrastructure and Water Management, April 10th 2025

Dear Members of the Committee,

We wish to thank you very much for giving Chemsec the opportunity to present our view during the coming roundtable discussion on PFAS. As introduction, we can submit the following information.

Who is Chemsec?

Chemsec is an NGO, based in Sweden. Our activities involve working with many different companies, challenging them to find alternatives to harmful chemicals. We coordinate the work of an investors group with over $18 trillion under management or advice to inform about chemicals risks. We also follow EU chemicals policies to drive discussions about the widespread use of hazardous chemicals, their effects on health and environment, and how we can find ways to move away from them in an effective way.

In recent years, PFAS has been one of our main focus areas. We work with companies, such as those in the PFAS movement, to inform about the availability of alternatives in different sectors and we follow the recent proposal for a broad restriction at the EU level very closely as observer at the Socio-Economic Analysis Committee at ECHA.

Why focus on PFAS?

It is no exaggeration to say that Europe is facing a PFAS crisis. So far, 23,000 sites contaminated with PFAS have been identified in the EU. All of us, including key EU policy makers, have PFAS in our blood. Our waters have concentrations of PFAS that, in many cases, are above safe levels.

The PFAS are called "*forever chemicals*", because they break down extremely slowly in nature. It is not possible to fully remove PFAS from water soil, and air, which means that concentrations in nature and our bodies will continue to rise until we have managed to stop using these substances.

What needs to be done?

As a responsible society, we must "turn of the tap" as soon as possible, so that PFAS are no longer discharged to the environment and people are not exposed from water, soil, air and different products.

The most efficient way to do this is to restrict the use of these substances, as has also been proposed at the EU level by 5 European states, including NL.

Are there alternatives available?

Today PFAS are used in numerous sectors, covering both consumer products and complicated industrial uses. The 5 countries behind the EU restriction proposal (*the uPFAS proposal*) made a very thorough **analysis of alternatives across sectors** before presenting their final proposal.

The aim of the uPFAS proposal is a **full phase-out with time** of all PFAS uses covered, but the proposal includes both long-term and shorter-term derogations for several specific uses based on the analysis of available alternatives.

Chemsec's work with companies has shown that in many cases the **market is already moving** away from PFAS (see figure below). For example, f-gases are increasingly being replaces with PFAS-free solutions in air-conditioning and heat pumps. The proposal itself has led to new solutions being developed for many different products and uses, and we believe society should protect the investments of companies that have taken these progressive steps.

When can we expect the universal PFAS ban?

It may take 5 years or even more before the EU uPFAS restriction proposal enters into force. Some stakeholders are calling for a much more limited restriction than originally proposed, even if this will not solve the PFAS crisis, only prolong it. The only way to effectively solve the PFAS crisis is a broad PFAS restriction with as few, as narrow, and as short-lived derogations as possible.

How could national measures benefit health and environment?

It will take years before the uPFAS restriction is in place, and even longer before all uses come to an end. Thus, additional national measures aiming at reducing the emissions earlier are certainly relevant, given the severity of the problem.