

ADVOCACY PLAN

PFAS

What is the issue and why is it important? (max 200 words)

The general ban on per- and polyfluorakyl substances (PFAS) as it currently stands would have a significant impact in our industries ability to manufacture their products.

A blanket ban on PFAS will endanger the achievement of the green transition and industry's competitiveness as currently, there are no viable alternatives for many products as they wouldn't work or would work significantly less efficiently without PFAS.

Key Orgalim objectives

1. Achieve a long-term general derogation with review before expiration
2. Ensure a risk-based and substance-based approach
3. The development of a defined procedure for the application, review and extension of derogations

Institutional Process/Advocacy milestones

When	Development	Orgalim advocacy	Members' advocacy suggestion
January 2023	Restriction Proposal Registration		
25 March – 25 September 2023	ECHA's Public Consultation	<p>Development of position with political messages and an Annex with technical data to respond to the public consultation</p> <p>Campaign on social media to share Orgalim's main concerns and messages on PFAS</p>	<ul style="list-style-type: none"> • Engagement with EU institutions and different industry stakeholders. Members will also engage and inform Orgalim about their exchanges with national authorities. • Coordinate with other EU-associations
January 2024	RAC- SEAC Opinion		<ul style="list-style-type: none"> • Development of the socio-economic impact assessment that the proposal for a universal ban will have on industry
Q1 2024 (2 months)	Public consultation on SEAC Opinion		<ul style="list-style-type: none"> • Develop a legal argument on why the current proposal is unlawful
April/May 2024	SEAC Final Opinion		
2025	European Commission Proposal		

2026	OJ publication	/	/
Key decision-makers (10 max)			
Name	Institution / Role	Rationale	Relationship w/ Orgalim
Ms. Maria Arena	MEP, S&D, Belgium	She made some points for the ban, but stated it would be better to be cautious	
Ms. Maria Spyraiki	MEP, EPP, Greece	Arguments opposing to the universal ban	
Mr. Andreas Gluck	MEP, Renew, Germany	Argued in the ENVI Committee using similar arguments as those from industry	
Mr. Martin Hojsik	MEP, Renew, Slovakia	He showed scepticism in the implementation of the PFAS restriction	
Mr. Peter Liese	MEP, EPP, Germany	Seems to oppose a blanket ban	
Ms. Kerstin Jorna	European Commission (Director – DG GROW) -	Met during Malaga industry days	
Mr. Giuseppe Casella	European Commission (Head of Unit – GROW F.1) - REACH		
Mr. Martijn Beekman	European Commission (SNE – GROW F.1) - REACH	Person in charge of the PFAS ban proposal. Will take part in our Chemicals TF meeting on December	
Mr. Hans Ingels	European Commission (Head of Unit – GROW F.2) – Bioeconomy, Chemicals & Cosmetics		
Orgalim Team			
<p>Julio Mateos – Junior Advisor for Environment (leader), Stephanie Mittelham – Manager Green Transition</p> <p>Lead Working Group and/or TF: Chemicals TF</p> <p>Chair, Vice-Chair: Arthur Vandenberghe (FIM), Kirsten Metz (ZVEI)</p>			