

## Notice: Phase-out of Perfluoroalkyl Substances (PFAS)

Dear Customers,

We would like to inform you about important regulatory developments regarding perfluoroalkyl substances (PFAS) and their impact on our activities and products.

### 1. International Regulatory Context

#### Stockholm Convention and Regulatory Developments on PFAS

The Stockholm Convention on Persistent Organic Pollutants (POPs) has progressively expanded restrictions on PFAS:

PFOS and Related Compounds:

- Listed in Annex B in 2009
- Restrictions with specific exemptions for critical uses
- Extension in 2019 to include all PFOS-related compounds

PFOA and Its Compounds:

- Listed in Annex A in 2019
- Total phase-out with limited temporary exemptions
- Includes PFOA salts and related compounds

PFHxS and Its Compounds:

- Decision in 2022 to include in Annex A
- Complete elimination with no specific exemptions
- Includes PFHxS, its salts, and related compounds
- Effective from late 2024

This regulatory evolution reflects the growing concern over the entire class of PFAS, which are recognized as:

- Extremely persistent in the environment
- Bioaccumulative in the food chain
- Mobile in environmental matrices (especially in water)
- Potentially toxic to humans and the environment

### 2. REACH Regulation of the European Union

The EU has taken decisive action through the REACH regulation:

- Restriction of PFOA, its salts, and related substances (Annex XVII, Entry 68)
- Proposal for a general PFAS restriction in the EU submitted by five member states in 2023

Specific limits on the use of PFAS in various industrial sectors:

#### Textile and Apparel

REACH Restriction (EU) 2023/2389: Limit of 1 µg/m<sup>2</sup> for PFAS in stain-resistant and oil-repellent treatments

Official reference: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023R2389>

ECHA Guidance: <https://echa.europa.eu/substances-restricted-under-reach>

REACH Annex XVII Entry 68: Restriction on PFOA

Complete Text: <https://echa.europa.eu/documents/10162/7a04b630-e00a-a9c5-bc85-0de793f6643c>

Proposal for Universal PFAS Restriction (Germany, Denmark, Netherlands, Norway, Sweden)

Full dossier: <https://echa.europa.eu/registry-of-restriction-intentions/-/dislist/details/0b0236e18663449b>

Voluntary Certification Standards:

OEKO-TEX® Standard 100: <https://www.oeko-tex.com/standard-100>

ZDHC MRSL v3.1: [https://www.roadmaptozero.com/mrsl\\_zwgl2021](https://www.roadmaptozero.com/mrsl_zwgl2021)

bluesign® System: <https://www.bluesign.com/criteria>

Industry Technical Guidelines:

EURATEX Guidelines on PFAS: <https://euratex.eu/news/guidelines-pfas>

SAC (Sustainable Apparel Coalition) Higg Index: <https://apparelcoalition.org/higg-index>

### 3. U.S. Regulations

EPA: PFAS Action Plan 2021-2024

Toxic Substances Control Act (TSCA): New restrictions on PFAS

States like California, Vermont, and Maine have already implemented stricter bans

Safe Drinking Water Act: Proposed limits for PFOA and PFOS in drinking water

### 3. ZDHC (Zero Discharge of Hazardous Chemicals)

The ZDHC roadmap includes:

- Complete phase-out of C8 PFAS
- Gradual phase-out of C6 PFAS
- Implementation of sustainable alternatives
- Compliance with the MRSL (Manufacturing Restricted Substances List) v3.1

### 4. Health and Safety Impacts

PFAS have been associated with several health effects:

- a) Potential carcinogenic effects
- b) Impact on the immune system
- c) Interference with the endocrine system
- d) Bioaccumulation in the body
- e) Persistence in the environment for extended periods

### 5. ESG Evaluation

#### Environmental

- Protection of water resources and ecosystems through the elimination of persistent substances
- Reduction of the environmental footprint of production processes
- Implementation of circular economy principles in the choice of alternatives
- Investment in eco-friendly technologies for surface treatments

#### Social

- Protection of the health of local communities and workers
- Training and development of staff skills on new sustainable technologies
- Transparency in communication with all stakeholders

#### Governance

- Integration of ESG criteria into business strategic decisions
- Certified environmental management system for monitoring objectives
- Due diligence in the supply chain to ensure compliance and sustainability

### 6. Our Commitment

In response to these developments, our company is committed to:

1. Gradually eliminating all PFAS from our products

2. Investing in research and development of sustainable alternatives
3. Maintaining maximum transparency with our customers
4. Providing technical support during the transition
5. Ensuring compliance with all applicable regulations

## 7. Phase-out Timeline

2025: Complete elimination of C6 PFAS currently used in stain-resistant and oil-repellent treatments

## 8. Contact

For any questions or clarifications, please contact us

We are available to provide further information and support during this important transition.

