To our valued customer,

On February 7th, ECHA published a proposal to restrict the use of PFAS substances. The PFAS group defined in the proposal contains more than 10,000 substances and includes fluoropolymers like PTFE and PVDF which are not typically covered by existing PFAS regulations.

In addition to this proposal in Europe, there are already several states in the United States which have laws concerning PFAS or are drafting such regulations.

The definition of PFAS, and therefore the impact on our products and processes, differs between these proposals/laws. Mitsubishi Chemical Group - Advanced Solutions Division is carefully following up on these laws/proposals and the resulting implications.

KAITEKI – “The sustainable wellbeing of people, society and our planet Earth”, is the vision of our parent company, Mitsubishi Chemical Group Corporation. Realizing KAITEKI means achieving a balance between the environment, society, technology and business needs. In this respect, we fully support the regulators in their effort to restrict and ban hazardous substances. However, we think the regulation of PFAS substances needs to be differentiated, based on their chemical composition, properties, and toxicological characteristics, as they do not possess the same risk or the same hazard. As some regulations recognize, there are also certain critical end uses that rely on PFAS materials that will require a careful comparison of risks and benefits.

Mitsubishi Chemical Group - Advanced Solutions Division shares the concern of ECHA and the public opinion on the release of hazardous PFAS substances to the environment during the production and end of life stage of fluoropolymers. However, during their lifetime, polymers like PTFE and PVDF have low hazard profiles. The importance of fluoropolymers in key applications in many technologies, such as renewable energy, semiconductors and medical applications should not be underestimated.

On March 22nd, a consultation period concerning the REACH restriction proposal started, during which comments can be made on the proposal. It is especially important that you, the downstream or end-user of the products, participate. As downstream users and end-users of the materials, you have the best knowledge on the wide range of critical applications for which fluoropolymer, or materials containing fluoropolymers, are being used. Input regarding the end use may also be important to demonstrate the risk of exposure to humans and environmental release. Therefore, it is vital that you participate in the consultation process through ECHA.

Your comments can be submitted to ECHA at this website. To have the most effect, it will be important that you make a submission by May 23rd, before ECHA’s first committee meetings on the topic.

Under the current restriction proposal, at least the following stock shapes, manufactured by Mitsubishi Chemical Group - Advanced Solutions Division, are affected:

Acetron®, Duratron®, Ertalyte®, Ertacetal®, Fluorosint®, Ketron®, Semitron® and Techtron® are registered trademarks of the Mitsubishi Chemical Advanced Materials Group.

If you have any additional questions, please don’t hesitate to contact us via the email: PFASQuestions@mcgc.com

Craig Valentine
Global Director of Compliance and Regulatory Affairs

All statements, technical information, recommendations, and advice are for informational purposes only and are not intended and should not be construed as a warranty of any type or term of sale. The reader, however, is cautioned that Mitsubishi Chemical Advanced Materials does not guarantee the accuracy or completeness of this information and it is the customer’s responsibility to test and assess the suitability of the products of Mitsubishi Chemical Advanced Materials in any given application or for use in a finished device.