

# Analytical Service for per- and polyfluoroalkyl substances (PFAS)

TÜV Rheinland LGA Products - Information

June 2024

Five EU national authorities, including the Netherlands, Germany, Denmark, Norway and Sweden, submitted a restriction proposal in January 2023 to ban the production, use and placing on the EU market of all per- and polyfluoroalkyl substances (PFAS).

On February 7, 2023, ECHA published the proposed Annex XV Restriction Report, which in its current version would be one of the largest chemical bans in Europe if adopted.

The Annex XV Restriction Report<sup>1</sup> and all supporting documents are available on the [ECHA website](https://echa.europa.eu/restrictions-under-consideration/-/substance-rev/72301/term).

What makes PFAS partly indispensable are unique physical properties such as water and grease repellent, the ability to reduce friction and high thermal and chemical stability, which make them suitable for a wide range of different applications.

Because of these unique properties, PFAS are used in numerous products / processes, such as:

- Heat resistant non-stick coatings
- Food packaging
- Stain resistant textiles and carpets
- Cosmetics
- Surfactants in electroplating (chrome plating),
- Fire extinguishing foams
- Production of semiconductors or
- Photographic processes.

## ANNEX XV RESTRICTION REPORT RESTRICTION

- I. 25 ppb for any PFAS as measured with targeted PFAS analysis (polymeric PFASs excluded from quantification)
- II. 250 ppb for the sum of PFASs measured as sum of targeted PFAS analysis, optionally with prior degradation of precursors (polymeric PFASs excluded from quantification)
- III. 50 ppm for PFASs (polymeric PFASs included). If total fluorine exceeds 50 mg F/kg the manufacturer, importer or downstream user shall upon request provide to the enforcement authorities a proof for the fluorine measured as content of either PFASs or non-PFASs.

<sup>1</sup> <https://echa.europa.eu/restrictions-under-consideration/-/substance-rev/72301/term>

## WHAT WE CAN DO FOR YOU?

TUV Rheinland offers a wide range of analytical services to detect the intentional and unintentional use of PFAS in products and mixtures enabling manufacturer brands, retailers, and suppliers to comply with the existing and upcoming legal obligations under EU and U.S. laws.

We offer three different testing packages:

- Test package 1: Existing market restrictions EU (incl. Switzerland).
- Test package 2: Testing of more than 100 PFAS
- Test package 3: Total fluorine content
- Test package 4: Total organic fluorine

CHEMICAL ANALYSIS OF PFAS FOR EUROPE AND THE USA		PACKAGE 1	PACKAGE 2	PACKAGE 3	PACKAGE 4
	Legal basis*	160.- Euro	220.- Euro	140.- Euro	200.- Euro
PFOA and related compounds	POP VO Annex I Part A	•	PAKET 1		
PFOS and its derivatives	POP VO Annex I Part A	•			
PFHxS and related compounds	POP VO Annex I Part A	•			
C9-C14 PFCA and related compounds	REACH VO Annex XVII	•			
PFHxA and related compounds	Recommendation for REACH VO		•		
Additional PFAS (C4F to C16F, > 25 PFAS)	-		•		
Total Fluorine (TF)	US states**			•	•
„Total Organic Fluorine“ (TOF)	US states**				•

\* Further national regulations possible in the European Economic Area, e.g. Switzerland ChemRRV – PFHxS restriction

\*\* including California AB 1817 or California AB 1200, screening for intentional use

\*\*\* the actual achievable reporting limit depends on the type and nature of the material to be analyzed (density, calorific value, composition, ...)

## OUR RECOMMENDATION

The analytical examination which products contain PFAS can be seen as the first and mandatory step in order to identify suitable substitutes, and to improve the affected products accordingly.

Besides the analytical testing, it is also suggested to monitor the supply chain with regard to the usage of chemicals. A review and further development can be carried out, for example, on the basis of production site audits on chemical and/or wastewater management (textile or electroplating industry), which are additional measures to eliminate PFAS from the production.

Companies who decide not react to the recent developments should at least prepare a process enabling them to respond in a timely manner to authorities or inquiries from NGOs.

Further information on current legal changes can also be found on our homepage at [www.tuv.com](http://www.tuv.com) or <https://www.tuv.com/regulations-and-standards/en/>.

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**Info box:** For additional information about PFAS Services please see:  
<https://go.tuv.com/pfas-testing>

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