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Date
2020-09-22

Eurovent's position to the ECHA public consultation on the PFHxA restriction proposal

In a nutshell

With this position paper, Eurovent supports the derogation request submitted by a coalition of leading filtration and separation media manufacturers (submission number 3014) for filtration and separation media used in high performance air and liquid applications that require a combination of water- and oil-repellence.

Providing the effective and energy-efficient filtration is essential for the HVAC industry. A number of Ecodesign requirements for HVAC products can only be met due to the use of low pressure drop air filters.

In the opinion of Eurovent members, the proposal to restrict C6 chemistry under the REACH Regulation poses a threat to accessing filtration products of required properties.

Eurovent is the European association of manufacturers of ventilation, air conditioning, refrigeration and heating systems (HVACR). Eurovent was founded in 1958 and over the years become a well-respected and known stakeholder. Currently, we represent more than 1.000 producers from over 30 countries. Our policy is to strongly support energy efficient and sustainable technologies, that contribute to well-being, life and work quality as well as safety aspects.

Effective and energy-efficient filtration plays a crucial role in all HVAC industries. The filtration media of which the air filters are made have a fundamental impact on their performance.

In this context, Eurovent would like to raise common concerns about the restriction proposal for PFHxA, its salts and PFHxA related substances under the REACH Regulation.

Eurovent expresses its support to the derogation request submitted by a coalition of leading filtration and separation media manufacturers (submission number 3014), for filtration and separation media used in high performance air and liquid applications that require a combination of water- and oil-repellency.

In addition to the information already submitted by this coalition, Eurovent would like to highlight the importance of C6 chemistry for the HVAC and EPA/HEPA/ULPA industries, with respect to the following aspects.

1. C6-treated filters are used in a variety of HVAC, EPA, HEPA and ULPA applications

- C6-treated filters for HVAC: Ventilation and indoor air quality, including residential and non-residential air handling units, air filters/cleaners/humidifiers, energy recovery components.
- C6-treated filters for EPA/HEPA and ULPA: e.g. hospitals, pharmaceuticals, laboratories, clean rooms, nuclear, food production. All these sectors rely on clean air and C6 fluorinated chemistry is critical to achieve this due to its unique performance in terms of water and oil repellency

2. C6 fluorinated chemistry is important to support the demand to reduce energy consumption for HVAC filters

C6 fluorinated chemistry ensures reduced pressure drop, which is critical to maintain low energy consumption, particularly in humid environments. Increasing pressure drop would force HVAC and EPA/HEPA/ULPA systems to use more energy to provide the required air flow.

A worldwide recognised standard for evaluating the energy efficiency of air filters (Eurovent REC 4-21) was developed by the members of Eurovent Product Group 'Air Filters'. It forms the basis for the certification programme carried out by the Eurovent Certita Certification body (ECC). Over 80% of filters placed on the EU market are ECC Certified.

3. Importance of glue repellency in the filter manufacturing process

Manufacturers use hot melt glue to fabricate numerous filter components, i.e. to assemble the filter media itself, to fix the pleats of the filters and to give them high mechanical resistance.

Without glue repellent properties, the glue would penetrate inside the media with the risk of clogging the pore, leading to an increase of pressure drop properties as well as a reduced lifetime. Glue-repellence is therefore a crucial feature for filter manufacturers.

4. Re-qualification process

The abovementioned properties are not the only factor to be considered. It should be noted that any change in the production process of filtration media would require the requalification of the filters containing the filtration media, and in certain cases of the HVAC equipment. This requalification does not concern the performance of filters in terms of water and oil repellency but the compliance of filters and HVAC products with all standards that apply to these products. A non-exhaustive list of these standards is provided in Table 1 below.

Table 1 – Standards for filtration media and filters in HVAC, EPA, HEPA and ULPA industries

Filtration and separation media – Performance in terms of repellency	Performance Standards
Water repellency	EN20811 (Hydrostatic pressure)
	ISO811 (Hydrostatic pressure)
	EDANA NWSP 080.6 (Hydrostatic pressure)
	Mil Std 282 (Q-101) (Hydrostatic pressure)
	NWSP 080.11.R0 (15) (Mason Jar)
	WSP 80.11 (09) (Mason Jar)
	ASME-AG-1-2017; FC-I-3241 (prior to gamma irradiation)
	ASME-AG1-2017; FC-I-3242 (after gamma irradiation)

Glue repellency and PU wicking	ISO 14419
	Tappi T559
	Dupont Kit test
	3M Kit test
Fire behaviour relevant to media	DIN53438
	DIN4102
	ISO11925
	EN13501
	NP P92-503, -504, -505
Other performance requirements per application	Filter Performance Standards
HVAC	EN779:2012
	ISO16890
	ASHRAE52.2
	ISO846
	VDI6022
	MIL-F-51079D
EPA/HEPA/ULP	EN1822
	ISO29463
Nuclear industry	ASME AG-1
	CTHEN

Fire behaviour relevant to final products for a wide range of applications	EN 45545-2:2016-02
	DIN 4102
	UL900
Energy efficiency of air filters	EUROVENT REC 4/21 – 2019

The re-qualification process for the introduction of new filter products includes the following steps:

- Internal redesign and testing;
- Third-party certification for filters as well as for finished HVAC and HEPA/EPA/ULPA equipment; and
- Field testing

It must be noted that the re-qualification process can only start once a good candidate has been identified. However, as discussed in the response from the coalition of filtration and separation media manufacturers, there are no candidates to replace C6 chemistry in high performance filtration applications.

Additionally, the filtration sector just completed its transition from C8 to C6, which took from 5 to 10 years depending on applications. As a result of the lack of alternatives, transitioning to non-fluorinated chemistry will take more time, and the duration of the requalification by customers is therefore expected to be longer.

5. Negligible releases related to use and disposal of C6-treated filters

C6 chemistry is integrated in the filter matrix. No release of C6 can be expected during the use phase of filters installed in HVAC, EPA/HEPA/ULPA applications.

Further, at the time of disposal, filters have to be disposed according to their corresponding waste code. Depending on the type of waste, the following codes would apply, for instance:

- 150202 – absorbents, filter materials (including oil filters not otherwise specified), wiping cloths, protective clothing contaminated by hazardous substances; and
- 150203 – absorbents, filter materials, wiping cloths and protective clothing other than those mentioned in 150202.

It should also be stressed that C6-treated filters are incorporated into equipment fall into Category 1 of the Waste Electrical and Electronic Equipment Directive (WEEE Directive), meaning they are subject to collection schemes.

EUROVENT thanks ECHA and relevant authorities for considering these comments and remains available to discuss any part of this contribution that would require clarifications.

Eurovent and transparency

When assessing position papers, are you aware whom you are dealing with?

Eurovent's structure rests upon democratic decision-making procedures between its members and their representatives. The more than 1.000 organisations within the Eurovent network count on us to represent their needs in a fair and transparent manner. Accordingly, we can answer policy makers' questions regarding our representativeness and decisions-making processes as follows:

1. Who receives which number of votes? At Eurovent, the number of votes is never determined by organisation sizes, country sizes, or membership fee levels. SMEs and large multinationals receive the same number of votes within our technical working groups: 2 votes if belonging to a national Member Association, 1 vote if not. In our General Assembly and Eurovent Commission ('steering committee'), our national Member Associations receive two votes per country.	2. Who has the final decision-making power? The Eurovent Commission acts as the association's 'steering committee'. It defines the overall association roadmap, makes decisions on horizontal topics, and mediates in case manufacturers cannot agree within technical working groups. The Commission consists of national Member Associations, receiving two votes per country independent from its size or economic weight.
3. How European is the association? More than 90 per cent of manufacturers within Eurovent manufacture in and come from Europe. They employ around 150.000 people in Europe largely within the secondary sector. Our structure as an umbrella enables us to consolidate manufacturers' positions across the industry, ensuring a broad and credible representation.	4. How representative is the organisation? Eurovent represents more than 1.000 companies of all sizes spread widely across 20+ European countries, which are treated equally. As each country receives the same number of votes, there is no 'leading' country. Our national Member Associations ensure a wide-ranging national outreach also to remote locations.

Check on us in the [European Union Transparency Register](#) under identification no. 89424237848-89.

We are Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies – thinking 'Beyond HVACR'

Eurovent is Europe's Industry Association for Indoor Climate (HVAC), Process Cooling, and Food Cold Chain Technologies. Its members from throughout Europe represent more than 1.000 companies, the majority small and medium-sized manufacturers. Based on objective and verifiable data, these account for a combined annual turnover of more than 30bn EUR, employing around 150.000 people within the association's geographic area. This makes Eurovent one of the largest cross-regional industry committees of its kind. The organisation's activities are based on highly valued democratic decision-making principles, ensuring a level playing field for the entire industry independent from organisation sizes or membership fees.

Eurovent's roots date back to 1958. Over the years, the Brussels-based organisation has become a well-respected and known stakeholder that builds bridges between the manufacturers it represents, associations, legislators and standardisation bodies on a national, regional and international level. While Eurovent strongly supports energy efficient and sustainable technologies, it advocates a holistic approach that also integrates health, life and work quality as well as safety aspects. Eurovent holds in-depth relations with partner associations around the globe. It is a founding member of the ICARHMA network, supporter of REHVA, and contributor to various EU and UN initiatives.

Igor Sikonczyk (Eurovent)

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