

PLANLAGTE PFAS RESTRIKTIONER UNDER REACH.

Vink Plast får dagligt henvendelser om PFAS indhold i de produkter vi leverer. Det gælder såvel plast som papirbaserede produkter. Vi kan ikke afvise, at der et eller andet sted i værdikæden ubevidst er tilført PFAS til vores produkter. Den undersøgelse pågår løbende. Det bør dog nævnes, at vi forhandler "articles" og ikke "substances," jvf. REACH, hvorfor risikoen for udslip af PFAS i vores del af værdikæden er yderst minimal.

PFAS er en fællesbetegnelse for per- og polyfluoroalkyl substanser. Gruppen af PFAS omfatter mere end 10.000 forskellige substanser, herunder fluoropolymerer som forhandles af Vink Plast – bl.a. PTFE og PVDF. Mange af substanserne er allerede reguleret under den såkaldte POP forordning EU 2019/1021 af 20. juni 2019 omhandlende persistente organiske miljøgifte (Persistent Organic Pollutants).

Holland, Tyskland, Norge, Sverige og Danmark har foreslået en yderligere regulering af PFAS, som en del af landenes bæredygtighedsstrategi for kemikalier. Forslaget sigter mod at adressere de risici der er for miljø samt menneskelig sundhed ved anvendelse af PFAS holdige produkter. De planlagte restriktioner omfatter ret vidtgående restriktioner af PFAS under EU's kemikalie regulativ REACH, EU 1907/2006. Processen, som tog sigte på implementering af denne restriktion, blev initieret i maj 2020 af de fem landes kompetente myndigheder. Interessenter blev inviteret til at bidrage med informationer om egenskaberne ved og anvendelserne af PFAS. De indsamlede informationer danner nu grundlag for det forslag, som er sendt til høring i EU. Der er tale om en høringsperiode på seks måneder. Den startede den 22. marts 2023.

Resultatet, der opnås ved høringen, forventes at danne grundlag for en REACH Annex XV dokumentation. Baseret på denne dokumentation vil Det Europæiske Kemikalie Agentur (ECHA) udsende en anbefaling om det eksakte indhold i eventuelle PFAS restriktioner under REACH.

Baseret på den viden der p.t. er tilgængelig fra vores leverandører og ECHA forventer vi, at en restriktion vil blive gjort gældende i 2025. Vi ved af gode grunde ikke hvad indholdet bliver. Indtil eventuelle yderligere restriktioner foreligger, kan vi oplyse, at vores produkter lever op til den nugældende kemikalielovgivning som beskrevet under REACH/SVHC - med seneste ændring implementeret den 17. januar 2023. En opdateret REACH erklæring fra Vink Plast findes på www.vink.dk.

Med denne erklæring håber vi at have skabt lidt mere klarhed omkring den meget komplekse PFAS problematik. Via partnerskaber med vores leverandører, vil vi til enhver tid leve op til gældende lovgivning og dokumentationskrav.

Randers, den 30. marts 2023

A blue ink signature of Morten Grue Jakobsen, written in a cursive style.

Morten Grue Jakobsen Business Unit Director

A blue ink signature of Jan Busk, written in a cursive style.

Jan Busk
QHSE- & CSR-manager

PLANNED PFAS RESTRICTIONS UNDER REACH

Vink Plast receives daily inquiries regarding PFAS content in the products we deliver, covering both plastic and paper-based materials. We cannot entirely rule out that PFAS may have been unintentionally introduced to our products somewhere upstream in the supply chain. This investigation is ongoing on a continuous basis. It should be noted, however, that we distribute “articles” and not “substances” as defined under REACH, which is why the risk of PFAS release in our part of the value chain is extremely minimal.

PFAS is an umbrella term for per- and polyfluoroalkyl substances. The group of PFAS encompasses more than 10,000 different substances, including fluoropolymers distributed by Vink Plast — such as PTFE and PVDF. Many of these substances are already regulated under the so-called POP Regulation (EU 2019/1021 of June 20, 2019) concerning persistent organic pollutants (Persistent Organic Pollutants).

The Netherlands, Germany, Norway, Sweden, and Denmark have proposed additional regulation of PFAS as part of the countries’ chemicals strategy for sustainability. The proposal aims to address the risks to the environment and human health associated with the use of PFAS-containing products. The planned restrictions include far-reaching restrictions on PFAS under the EU chemical regulation REACH, EU 1907/2006. The process aimed at implementing this restriction was initiated in May 2020 by the competent authorities of the five countries. Stakeholders were invited to contribute information on the properties and uses of PFAS. The collected information now forms the basis of the proposal submitted for EU public consultation. The consultation period ran for six months, starting on March 22, 2023.

The results obtained from the consultation are expected to form the basis of a REACH Annex XV dossier. Based on this documentation, the European Chemicals Agency (ECHA) will issue a recommendation on the exact content of any eventual PFAS restrictions under REACH.

Based on the knowledge currently available from our suppliers and ECHA, we expect a restriction to come into force in 2025. For obvious reasons, we do not know what the specific content will be. Until any further restrictions are published, we can inform you that our products comply with current chemical legislation as described under REACH/SVHC — with the latest amendment implemented on January 17, 2023. An updated REACH declaration from Vink Plast can be found at www.vink.dk.

With this declaration, we hope to have provided greater clarity regarding the highly complex PFAS issue. Through partnerships with our suppliers, we will at all times comply with applicable legislation and documentation requirements.

Randers, den 30. marts 2023

A handwritten signature in blue ink, appearing to read "Morten Grue Jakobsen".

Morten Grue Jakobsen Business Unit Director

A handwritten signature in blue ink, appearing to read "Jan Busk".

Jan Busk
QHSE- & CSR-manager