

## **PFAS Position Statement**

Savillex is committed to:

- 1. Providing information to stakeholders regarding PFAS so that thoughtful, informed discussion is possible
- 2. Working with supply chain partners to ensure environmental stewardship is promoted during the manufacture of fluoropolymer plastics used by Savillex
- 3. Continuously improving our efforts to capture and reuse fluoropolymer plastics processed by Savillex
- 4. Encouraging best practices for end-of-life handling of fluoropolymer products by users
- 5. Remaining compliant with environmental and health & safety regulations and best practices related to fluoropolymer plastics

The fluoropolymer plastics processed by Savillex satisfy widely accepted assessment criteria to be considered "polymers of low concern".

## According to the American Chemistry Council's Performance Fluoropolymer Partnership:

## Fluoropolymers satisfy widely accepted assessment criteria to be considered as "polymers of low concern" (PLC).<sup>1</sup>

Fluoropolymers, high molecular weight polymers, have unique properties that constitute a distinct class within the PFAS group. Fluoropolymers have thermal, chemical, photochemical, hydrolytic, oxidative, and biological stability. They have negligible residual monomer and oligomer content and low to no leachables. Fluoropolymers are practically insoluble in water and not subject to long-range transport. With a molecular weight well over 100,000 Da, fluoropolymers cannot cross the cell membrane. Fluoropolymers are not bioavailable or bioaccumulative.

## It is not scientifically appropriate to group fluoropolymers with other PFAS classes.<sup>1</sup>

Furthermore, fluoropolymers have unique properties that constitute a distinct class within the PFAS group. They are distinctly different from other polymeric and nonpolymeric PFAS and should be separated from them for hazard assessment or regulatory purposes. Grouping fluoropolymers with all classes of PFAS for "read across" or structure–activity relationship assessment is not scientifically appropriate.

<sup>1</sup> A Critical Review of the Application of Polymer of Low Concern and Regulatory Criteria to Fluoropolymers (2018) Barbara J Henry, Joseph P Carlin, Jon A Hammerschmidt, Robert C Buck, William Buxton, Heidelore Fiedler, Jennifer Seed, and Oscar Hernandez



For more information regarding the 2018 and 2022 papers published by the Performance Fluoropolymer Partnership:

Performance Fluoropolymer Partnership

In 2018, the PFP published an evaluation of four fluoropolymers (ETFE, FEP, PFA, PTFE) against internationally recognized criteria for identifying polymers of low concern. The link to the 2018 paper is below:

<u>A critical review of the application of polymer of low concern and regulatory criteria to fluoropolymers - Henry</u> - 2018 - Integrated Environmental Assessment and Management - Wiley Online Library

In 2022, the PFP published an evaluation of an additional 14 fluoropolymers against internationally recognized criteria for identifying polymers of low concern. The link to the 2022 paper is below:

A critical review of the application of polymer of low concern regulatory criteria to fluoropolymers II: Fluoroplastics and fluoroelastomers - Korzeniowski - Integrated Environmental Assessment and Management -Wiley Online Library