

PFAS: LA PROPOSTA EUROPEA¹

Nelle scorse settimane cinque Paesi europei (Danimarca, Germania, Svezia, Paesi Bassi e Norvegia) hanno presentato una proposta per la messa al bando dell'uso e della produzione di PFAS (Sostanze Poli- e Per- fluoroalchiliche) nell'ambito del regolamento europea REACH. Si tratterebbe della regolamentazione più ampia e significativa presentata nella storia dell'Unione Europea (e probabilmente anche a livello globale)². Il dossier, oltre a prendere in esame i rischi ambientali e gli effetti sulla salute di questi composti, fornisce una valutazione complessiva sull'efficacia, sulla praticabilità, e sulla possibilità di monitorare gli effetti e le conseguenze della proposta, oltre agli impatti socioeconomici. A seguito della pubblicazione del dossier, lo scorso 22 marzo sono partiti i sei mesi di consultazione pubblica previsti dall'iter normativo in cui vari stakeholder possono inviare osservazioni.

Scopo della proposta

Il dossier parte dalla definizione di PFAS identificata dall'OCSE e fa riferimento a oltre 10 mila sostanze chimiche: non solo i PFAS noti per essere persistenti, bioaccumulabili e pericolosi per la salute, ma anche i polimeri che ne derivano, i cosiddetti Fluoropolimeri (il più noto è il PTFE commercializzato da alcune aziende come Teflon). Storicamente i PFAS in forma di polimeri sono stati considerati innocui a causa del loro elevato peso molecolare che diventa un limite oggettivo per superare le barriere biologiche di cellule, tessuti e organi. Ma anche i Fluoropolimeri rispondono al criterio di persistenza e per questo vengono inclusi nella proposta di restrizione (si veda dopo).

La definizione copre anche tutti i PFAS a catena corta come i gas fluorurati, usati nella refrigerazione, nel riscaldamento e nella ventilazione. Vengono considerati allo stesso modo anche quei PFAS che hanno buone caratteristiche di degradabilità (che però, quando dispersi nell'ambiente, si decompongono in PFAS più pericolosi e persistenti). Il provvedimento <u>non copre solo</u> le schiume antincendio, già oggetto di un iter di regolamentazione separato tutt'ora in corso.

L'approccio del dossier è il più ampio possibile e mira ad ottenere l'azzeramento dell'uso e della produzione nella quasi totalità dei comparti industriali in poco più di dieci anni.

Un business globale in mano a poche multinazionali

Il 60% della produzione globale di fluoropolimeri a base di PFAS è in mano a otto multinazionali (65% della produzione globale è in Cina): Shandong Donyue Group (13%),

¹ Questa è una sintesi, non esaustiva, del corposo dossier (1800 pagine) per la messa al bando dei PFAS in Europa

² Abitualmente le proposte di restrizione sono focalizzate su una sostanza alla volta (si veda ad esempio Convenzione di Stoccolma)

Chemours (ex Du Pont 12%), Daikin (11%), Solvay (8%), Arkema (7%), 3M³/Dyneon (5%) e AGC INC (4%). In Italia operano due stabilimenti: quello di Solvay Solexis a Spinetta-Marengo (Alessandria) e quello di Daikin a Collebeato (Brescia)

Usi industriali ed emissioni

Nel continente europeo nei prossimi 30 anni, in assenza di misure, l'uso complessivo di PFAS sarà pari a 49 milioni di tonnellate, generando un quantitativo di emissioni totale, nelle sole fasi di produzione e uso, pari a 4,5 milioni di tonnellate (in questo calcolo sono esclusi i rifiuti⁴, quindi il quantitativo disperso in ambiente potrebbe essere di gran lunga sottostimato). Tutto ciò andrà a generare dei costi ambientali e sanitari ben più alti rispetto a quelli attualmente stimati nel range compreso tra 52 e 84 miliardi di euro l'anno in UE⁵.

Le emissioni complessive medie nel 2020 di PFAS sono stimate in un quantitativo di poco inferiore alle 75 mila tonnellate, e incluse nel range tra 56 mila e 92 mila tonnellate (*Table 1*). I settori industriali (per cui esistono dei dati) a emettere i maggiori quantitativi di PFAS nelle fasi di uso e produzione sono, nell'ordine, quelli in cui si impiegano i gas fluorurati e TULAC (ovvero tessile, tappezzeria, pelle, abbigliamento).

ANNEX XV RESTRICTION REPORT - Per- and polyfluoroalkyl substances (PFASs)

Table 1. Estimated annual emissions from the use phase for PFAS manufacture and major PFAS use sectors in 2020 (low, mid and high estimates). Emissions relate to new products on the market, unless stated otherwise. Mid points are used in impact assessment.

| Application | PFAAs and PFAA precursors (t/y) | | | Fluorinated gases (t/y) | | | Polymeric PFASs (t/y) | | | Total PFASs (t/y) | | |
|--|---------------------------------------|-------|--------|----------------------------|-----------------|-----------------|--------------------------|-----------|-----------|----------------------|-----------------|-----------------|
| | low | mid | high | Low | mid | high | low | mid | high | low | mid | high |
| Manufacture | 54 | 86 | 118 | 309 | 1 973 | 3 637 | 15 | 23 | 30 | 378 | 2 082 | 3 785 |
| TULAC ^b | 2 058 | 6 177 | 10 295 | | | | 8 326 | 16 643 | 24 960 | 10 384 | 22 820 | 35 255 |
| Food contact materials and packaging | 123 | 491 | 858 | | | | 99 | 100 | 100 | 222 | 591 | 959 |
| Metal plating and manufacture of metal products ^c | 0.5 | 6 | 11.4 | | | | | | | 1 | 6 | 11 |
| Consumer mixtures | | | | | | | | | | 23 | 23 | 23 |
| Cosmetics | | | | | | | | | | 0.015 | 32 | 64 |
| Ski wax | | | | | | | | | | 1 | 1 | 1 |
| Applications of fluorinated gases ^{d,e} | | | | 38 806 1 696 | 38 806 1 696 | 38 806 1 696 | | | | 38 806 1 696 | 38 806 1 696 | 38 806 1 696 |
| Medical devices | 128 | 239 | 350 | 3 772 | 5 586 | 7 400 | 32 | 76 | 120 | 3 932 | 5 901 | 7 870 |
| Transport ^d | | | | | | | 269 35 | 439 58 | 609 80 | 269 35 | 439 58 | 609 80 |
| Electronics and semiconductors | 348 | 513 | 677 | 7 | 7 | 7 | 11 | 152 | 292 | 366 | 671 | 976 |
| Energy sector | 42 | 42 | 42 | | | | 12 | 13 | 13 | 53 | 55 | 56 |
| Construction products | 88 | 152 | 216 | | | | 1 364 | 2 338 | 3 311 | 1 451 | 2 489 | 3 527 |
| Lubricants | 0.11 | 0.6 | 1.1 | 29 | 46 | 62 | 123 | 174 | 225 | 152 | 220 | 288 |
| Petroleum and mining ^c | 0.3 | | 2.3 | | | | | | | 0 | 1 | 2 |
| TOTAL ^f | 2 842 | 7 707 | 12 571 | 42 923 | 46 418 | 49 912 | 10 251 | 19 958 | 29 660 | 56 038 | 74 137 | 92 232 |
| Total ^g | 2 842 | 7 707 | 12 571 | 5 813 | 9 308 | 12 802 | 10 017 | 19 577 | 29 131 | 18 694 | 36 646 | 54 593 |

a) In some cases a basis for providing a range is lacking. There the available estimate is applied throughout; b) TULAC = Textile, upholstery, leather, apparel and carpets; c) No data available for emission of polymeric PFASs; d) For these sectors the emissions relate to stock (presented in italics). For reference only, the emissions from tonnage brought new to market in 2020 are also given; e) Includes emissions of fluorinated gases in transport sector; f) Total based on emissions from best available data (stock if available, new to market if stock is not available); g) For reference only, also the total emissions from tonnage brought new to market in 2020 are presented.

³ 3M ha già annunciato che interromperà la produzione a partire dal 2025 https://cen.acs.org/environment/persistent-pollutants/3M-says-end-PFAS-production/101/i1

⁴ Stima molto difficile da ottenere perché soggetta a molteplici variabili

⁵ Il progetto giornalistico Forever Pollution Project ha stimato la presenza di 17 mila siti contaminati in Europa

Come si evince dalla tabella (*Table 3*), limitata al solo 2020, si stima un uso annuo pari a circa 837 mila tonnellate⁶ in Europa (30% di queste prodotte in UE). Riguardo l'uso complessivo troviamo, nell'ordine, l'applicazione dei gas fluorurati, le aziende che producono PFAS, il settore dei trasporti e TULAC (ovvero tessile, tappezzeria, pelle, abbigliamento).

Table 3. Estimated annual tonnages for PFAS manufacture and major PFAS use sectors for 2020 (low, mid and high estimates)^a. Tonnages are for PFAS used or placed on the market (as substance on their own, in mixtures or articles), unless stated otherwise. Mid points are used in impact

| PFAAs and PFAA precursors | | | Fluorinated gases | | | Polymeric PFASs | | | Total PFASs | | | |
|---|--------|--------|-------------------|-------------------|-------------------|-------------------|-----------------|-------------------|-------------------|-------------------|-------------------|-------------------|
| Application | (t/y) | | | (t/y) | | | (t/y) | | | (t/y) | | |
| | low | mid | high | Low | mid | high | low | mid | high | low | mid | high |
| Manufacture | 53 902 | 85 977 | 118 051 | 15 000 | 95 774 | 176 548 | 49 000 | 75 381 | 101 763 | 117 902 | 257 132 | 396 362 |
| TULAC ^b | 8 092 | 20 620 | 33 148 | | | | 33 091 | 71 318 | 109 544 | 41 183 | 91 938 | 142 692 |
| Food contact materials and packaging | 3 267 | 6 305 | 9 342 | | | | 15 330 | 17 880 | 20 430 | 18 597 | 24 185 | 29 772 |
| Metal plating and manufacture of metal products | 2 | 30 | 57 | | | | 960 | 960 | 960 | 962 | 990 | 1 017 |
| Consumer mixtures | | | | | | | | | | 21 | 26 | 30 |
| Cosmetics | | | | | | | | | | 0.028 | 32.1 | 64.2 |
| Ski wax | | | | | | | | | | 1.6 | 1.6 | 1.6 |
| Applications of fluorinated gases ^{c,d} | | | | 493 173 30 671 | 493 173 30 671 | 493 173 30 671 | | | | 493 173 30 671 | 493 173 30 671 | 493 173 30 671 |
| Medical devices | 1 279 | 2 387 | 3 495 | 20 160 | 33 080 | 46 000 | 3 233 | 7 633 | 12 032 | 24 672 | 43 100 | 61 527 |
| Transport | | | | | | | 97 216 6 410 | 159 712 10 532 | 222 208 14 653 | 97 216 6 410 | 159 712 10 532 | 222 208 14 653 |
| Electronics and semiconductors | 841 | 1 195 | 1 549 | 140 | 140 | 140 | 1 560 | 3 088 | 4 615 | 2 541 | 4 423 | 6 304 |
| Energy sector | 293 | 294 | 294 | | | | 2 592 | 2 756 | 2 920 | 2 885 | 3 050 | 3 214 |
| Construction products | 987 | 1 696 | 2 405 | | | | 4 254 | 7 287 | 10 320 | 5 241 | 8 983 | 12 725 |
| Lubricants | 1 | 6 | 10 | 70 | 110 | 150 | 1 100 | 1 550 | 2 000 | 1 171 | 1 666 | 2 160 |
| Petroleum and mining | 4.4 | 7 | 9.5 | | | | 3 500 | 5 500 | 7 500 | 3 504 | 5 507 | 7 510 |
| TOTAL (excl. manufacture)* | 14 766 | 32 540 | 50 310 | 513 543 | 526 503 | 539 463 | 162 836 | 277 684 | 392 529 | 691 168 | 836 787 | 982 398 |
| Total ^f | 14 766 | 32 540 | 50 310 | 51 041 | 64 001 | 76 961 | 72 030 | 128 504 | 184 974 | 137 860 | 225 105 | 312 341 |

Deroghe ed esenzioni

La proposta entrerà in vigore dopo 18 mesi dall'approvazione. Si caratterizza per l'introduzione di una serie di deroghe, molte delle quali con un intervallo temporale limitato e stabilito in base alla disponibilità di alternative. Tuttavia, non per tutte le deroghe sono stati inseriti dei limiti temporali come ad esempio biocidi, pesticidi e principi attivi di farmici ad uso umano e veterinario. Di seguito la lunga lista di deroghe:

| Paragraph 4 | Use | Period (years after 'entry into force', not including 18 month transition period) |
|----------------|--|--|
| а | Active substances in <i>biocidal products</i> within the scope of Regulation (EU) 528/2012 | Unlimited |
| b | Active substances in <i>plant protection products</i> within the scope of Regulation (EC) 1107/2009 | Unlimited |
| С | Active substances in <i>human and veterinary medicinal products</i> within the scope of Regulation (EC) No 726/2004, Regulation (EU) 2019/6 and Directive 2001/83/EC | Unlimited |

⁶ Una quantità pari a 5 Boing 747 a pieno carico (incluso il peso dell'areo) al giorno

| apply to the production of PTFE, PVDF and FKM b | Paragraph 5 | Use | Period (years after 'entry into force', not including 18- month transition period) |
|---|----------------|---|--|
| protect users against risks as specified in Regulation (EU) 2016/425, Annex I, Risk Category III (a) and (c) c | a | Polymerisation aids in the production of polymeric PFASs. Does not apply to the production of PTFE, PVDF and FKM | 5 |
| professional firefighting activities intended to protect users against risks as specified in Regulation (EU) 2016/425, Annex I, Risk Category III (a) - (m) d Impregnation agents for re-impregnation of articles referred to in paragraph 5b and 5c e Textiles for the use in filtration and separation media used in high performance air and liquid applications in industrial or professional settings that require a combination of water and oil repellence f Refrigerants in low temperature refrigeration below -50°C g Refrigerants in laboratory test and measurement equipment h Refrigerants in laboratory test and measurement equipment i Maintenance and refilling of existing HVACR equipment put on the market before [18 months after entry into force] and for which no drop-in alternative exists j Refrigerants in HVACR equipment in buildings where national safety standards and building codes prohibit use of alternatives k Industrial precision cleaning fluids l Cleaning fluids for use in oxygen-enriched environments t Clean fire suppressing agents where current alternatives damage the assets to be protected or pose a risk to human health n Diagnostic laboratory testing o Additives to hydraulic fluids for anti-erosion/anti-corrosion in hydraulic systems (including control valves) in aircraft and aerospace industry p Refrigerants in mobile air conditioning systems in combustion engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) 5 Lubricants where the use takes place under harsh conditions, or the | b | protect users against risks as specified in Regulation (EU) 2016/425, | 12 |
| paragraph 5b and 5c e | С | professional firefighting activities intended to protect users against risks as specified in Regulation (EU) 2016/425, Annex I, Risk | 12 |
| performance air and liquid applications in industrial or professional settings that require a combination of water and oil repellence f Refrigerants in low temperature refrigeration below -50°C 5 g Refrigerants in laboratory test and measurement equipment 12 h Refrigerants in refrigerated centrifuges 12 i Maintenance and refilling of existing HVACR equipment put on the market before [18 months after entry into force] and for which no drop-in alternative exists 13 j Refrigerants in HVACR equipment in buildings where national safety standards and building codes prohibit use of alternatives 12 k Industrial precision cleaning fluids 12 l Cleaning fluids for use in oxygen-enriched environments 12 m Clean fire suppressing agents where current alternatives damage the assets to be protected or pose a risk to human health 12 n Diagnostic laboratory testing 12 o Additives to hydraulic fluids for anti-erosion/anti-corrosion in 12 hydraulic systems (including control valves) in aircraft and aerospace industry 12 p Refrigerants in mobile air conditioning systems in combustion 13 engine vehicles with mechanical compressors 14 q Refrigerants in transport refrigeration other than in marine 15 applications 15 r Insulating gases in high-voltage switchgear (above 145 kV) 5 Lubricants where the use takes place under harsh conditions, or the 12 | d | | 12 |
| g Refrigerants in laboratory test and measurement equipment h Refrigerants in refrigerated centrifuges i Maintenance and refilling of existing HVACR equipment put on the market before [18 months after entry into force] and for which no drop-in alternative exists j Refrigerants in HVACR equipment in buildings where national safety standards and building codes prohibit use of alternatives k Industrial precision cleaning fluids l Cleaning fluids for use in oxygen-enriched environments 12 m Clean fire suppressing agents where current alternatives damage the assets to be protected or pose a risk to human health n Diagnostic laboratory testing o Additives to hydraulic fluids for anti-erosion/anti-corrosion in hydraulic systems (including control valves) in aircraft and aerospace industry p Refrigerants in mobile air conditioning systems in combustion engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) 5 Lubricants where the use takes place under harsh conditions, or the | е | performance air and liquid applications in industrial or professional | 5 |
| h Refrigerants in refrigerated centrifuges i Maintenance and refilling of existing HVACR equipment put on the market before [18 months after entry into force] and for which no drop-in alternative exists j Refrigerants in HVACR equipment in buildings where national safety standards and building codes prohibit use of alternatives k Industrial precision cleaning fluids l Cleaning fluids for use in oxygen-enriched environments m Clean fire suppressing agents where current alternatives damage the assets to be protected or pose a risk to human health n Diagnostic laboratory testing o Additives to hydraulic fluids for anti-erosion/anti-corrosion in hydraulic systems (including control valves) in aircraft and aerospace industry p Refrigerants in mobile air conditioning systems in combustion engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) 5 Lubricants where the use takes place under harsh conditions, or the | f | Refrigerants in low temperature refrigeration below -50°C | 5 |
| h Refrigerants in refrigerated centrifuges i Maintenance and refilling of existing HVACR equipment put on the market before [18 months after entry into force] and for which no drop-in alternative exists j Refrigerants in HVACR equipment in buildings where national safety standards and building codes prohibit use of alternatives k Industrial precision cleaning fluids l Cleaning fluids for use in oxygen-enriched environments m Clean fire suppressing agents where current alternatives damage the assets to be protected or pose a risk to human health n Diagnostic laboratory testing o Additives to hydraulic fluids for anti-erosion/anti-corrosion in hydraulic systems (including control valves) in aircraft and aerospace industry p Refrigerants in mobile air conditioning systems in combustion engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) 5 Lubricants where the use takes place under harsh conditions, or the | g | Refrigerants in laboratory test and measurement equipment | 12 |
| market before [18 months after entry into force] and for which no drop-in alternative exists j Refrigerants in HVACR equipment in buildings where national safety standards and building codes prohibit use of alternatives k Industrial precision cleaning fluids 1 Cleaning fluids for use in oxygen-enriched environments 12 m Clean fire suppressing agents where current alternatives damage the assets to be protected or pose a risk to human health n Diagnostic laboratory testing o Additives to hydraulic fluids for anti-erosion/anti-corrosion in hydraulic systems (including control valves) in aircraft and aerospace industry p Refrigerants in mobile air conditioning systems in combustion engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) 5 Lubricants where the use takes place under harsh conditions, or the | | | 12 |
| safety standards and building codes prohibit use of alternatives k Industrial precision cleaning fluids 1 Cleaning fluids for use in oxygen-enriched environments 12 m Clean fire suppressing agents where current alternatives damage the assets to be protected or pose a risk to human health n Diagnostic laboratory testing o Additives to hydraulic fluids for anti-erosion/anti-corrosion in hydraulic systems (including control valves) in aircraft and aerospace industry p Refrigerants in mobile air conditioning systems in combustion engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) 5 Lubricants where the use takes place under harsh conditions, or the | i | market before [18 months after entry into force] and for which no | 12 |
| Cleaning fluids for use in oxygen-enriched environments 12 | j | , , , | Unlimited |
| m Clean fire suppressing agents where current alternatives damage the assets to be protected or pose a risk to human health n Diagnostic laboratory testing o Additives to hydraulic fluids for anti-erosion/anti-corrosion in hydraulic systems (including control valves) in aircraft and aerospace industry p Refrigerants in mobile air conditioning systems in combustion engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) s Lubricants where the use takes place under harsh conditions, or the | k | Industrial precision <i>cleaning fluids</i> | 12 |
| the assets to be protected or pose a risk to human health n Diagnostic laboratory testing o Additives to hydraulic fluids for anti-erosion/anti-corrosion in hydraulic systems (including control valves) in aircraft and aerospace industry p Refrigerants in mobile air conditioning systems in combustion engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) s Lubricants where the use takes place under harsh conditions, or the | ı | Cleaning fluids for use in oxygen-enriched environments | 12 |
| o Additives to hydraulic fluids for anti-erosion/anti-corrosion in hydraulic systems (including control valves) in aircraft and aerospace industry p Refrigerants in mobile air conditioning systems in combustion engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) s Lubricants where the use takes place under harsh conditions, or the | m | | 12 |
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| engine vehicles with mechanical compressors q Refrigerants in transport refrigeration other than in marine applications r Insulating gases in high-voltage switchgear (above 145 kV) 5 s Lubricants where the use takes place under harsh conditions, or the 12 | o | hydraulic systems (including control valves) in aircraft and | 12 |
| applications r Insulating gases in high-voltage switchgear (above 145 kV) s Lubricants where the use takes place under harsh conditions, or the 12 | р | | 5 |
| s Lubricants where the use takes place under harsh conditions, or the 12 | q | | 5 |
| | r | Insulating gases in high-voltage switchgear (above 145 kV) | 5 |
| ase is needed for safe functioning and safety of equipment | S | Lubricants where the use takes place under harsh conditions, or the use is needed for safe functioning and safety of equipment | 12 |
| t Calibration of measurement instruments and as analytical Unlimited reference materials | t | Calibration of measurement instruments and as analytical | Unlimited |

Manca l'approccio basato sull'uso essenziale

La proposta non ricorre al concetto di uso essenziale: ovvero consentire, in assenza di alternative valide per la tutela dell'ambiente e della salute, l'uso di sostanze chimiche pericolose solo nei casi in cui il loro impiego è assolutamente necessario per la salute o la sicurezza, o possa essere ritenuto critico per funzioni fondamentali per la società (ad esempio per la fabbricazione delle divise dei vigili del fuoco).

Il protocollo di Montreal, nato per regolamentare e mettere al bando le sostanze che distruggono lo strato di ozono stratosferico, è stato un concreto caso di successo globale basato proprio sul concetto di uso essenziale. Con un approccio analogo avremmo avuto un minor numero di deroghe ed esenzioni rispetto a quelle proposte nella restrizione PFAS.

La persistenza giustifica l'approccio di gruppo

Come noto i PFAS, una volta immessi in natura, tendono a degradarsi in tempi estremamente lunghi diventando dei composti chimici persistenti (da qui il nome *Forever Chemicals*) e sono

peraltro in grado di essere trasportati su lunghe distanze con le masse d'aria e d'acqua. Il regolamento REACH prevede l'introduzione di restrizioni per quelle sostanze se sussistono <u>rischi inaccettabili</u> per la salute e l'ambiente. L'elevata persistenza⁷ è uno di questi rischi, unita all'elevata mobilità e la capacità di bioaccumulo. Tutti i PFAS presi in esame nella proposta rispondono direttamente ai criteri di persistenza o si degradano in altri PFAS persistenti una volta dispersi nell'ambiente.

LINK UTILI

La proposta europea, completa di allegati è disponibile a questo link: https://echa.europa.eu/it/registry-of-restriction-intentions/-/dislist/details/0b0236e18663449b

Nella stessa pagina web (appendice E2 file excel) è possibile scaricare il database con le alternative ai PFSA già disponibili nei vari settori industriali. Riguardo la fattibilità socio-economica delle varie alternative nei differenti settori industriali si faccia riferimento alla classificazione a colori (semaforo) presente nella tabella F.3 (*Table F.3*) disponibile qui: https://echa.europa.eu/documents/10162/290b67b0-f592-a78a-1854-e2574d675c4a

Di seguito alcune alternative per i vari settori industriali:

Gas refrigeranti: Ammoniaca, Anidride Carbonica, Azoto, Metilale, Etanolo, Argon etc

Packaging e altri materiali destinati al contatto con gli alimenti: materiali vegetali derivanti da piante, evitare di rivestire il packaging in carta con trattamenti idrorepellenti, materiali derivanti dall'argilla, biopolimeri (chitosano, cellulosa, acido polilattico), composti a base di silicone etc

TULAC: composti a base di cera d'api, paraffine, alcoli etossilati, cere, cera di carnauba, polimeri acrilici o a base di siliconi, dimeticone, dendrimeri, emulsioni a base di poliuretano etc

⁷ La persistenza è uno dei criteri che identificano la pericolosità delle sostanze note come interferenti endocrini. Si veda ad esempio il provvedimento approvato di recente nell'ambito del regolamento CLP (Classification, Labelling and Packaging) delle sostanze chimiche. A partire da pagina 9 del documento https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2023:093:FULL&from=EN