

28th October 2025, Brussels

To:

Mrs. Ursula von der Leyen, President of the European Commission,
Mr. Stéphane Séjourné, Executive Vice-President of the European Commission,
Ms. Jessika Roswall, Commissioner of the European Commission

The undersigned producers of PFAS alternative technologies are writing to you to bring to your attention that **PFAS-free alternatives are either already available or are up and coming in all the green transition technologies** that the chemical industry claims PFAS are necessary in. We consider that **a green transition can happen in the EU without the use of PFAS whilst simultaneously enhancing the business competitiveness** that the EU leaders have been calling for and also bolstering technological innovation to position the EU as a global leader in the green transition.

PFAS-free alternatives for F-gases in refrigerants

Refrigerants use Hydrofluoroolefins (HFOs), which belong to a sub-group of PFAS known as F-gases. Several common HFOs – especially the most prevalent one, HFO-1234yf – break down in the atmosphere into another PFAS called trifluoroacetic acid (TFA), which combines with rain and infiltrates the environment. TFA is a very persistent and mobile PFAS and has contaminated drinking water supplies across the EU. Discussions are currently ongoing to classify TFA under the CLP legislation as a persistent, mobile and reprotoxic substance. The good news is that the rising concentration of TFA in the environment can be addressed by switching to PFAS-free alternatives in refrigerants. The main alternative used in domestic heat pumps is propane (R290). For commercial and industrial pumps, carbon dioxide (CO₂) and ammonia (NH₃) are the main alternatives. In addition, motor vehicle air-conditioning and heat pump systems are beginning to transition to CO₂ and propane. There are very established safety mechanisms for propane, CO₂ and ammonia technologies and these alternatives are currently being offered by numerous manufacturers at marketable and economically efficient rates.

PFAS-free alternatives for fluoropolymers in hydrogen ion exchange membranes, solar panels and batteries (in electric vehicles)

Green technologies like green hydrogen, solar panels and batteries use a sub-group of PFAS called fluoropolymers. Some of the chemical industry argue that fluoropolymers are substances of ‘low concern’. However, the OECD has recently clarified that it has never outlined any criteria for substances of ‘low concern’. Independent science shows that fluoropolymers emit harmful PFAS at every stage of their life cycle - during their production, use and disposal. Thus, fluoropolymers pose unacceptable risks to human health and the environment. Again, the good news is that fluoropolymer-free solutions for green hydrogen technology, solar panels and batteries are already being marketed by several companies.

The cost of inaction on PFAS pollution is huge. Research has shown that the healthcare from PFAS exposure could cost Europe €52-84 billion on an annual basis. Innovative European businesses have the talent, and commitment to create a competitive PFAS-free EU economy, however these need to be backed up with the political will and institutional support. The EU has the opportunity to support a comprehensive PFAS restriction for a complete phase-out with minimal derogations and transition times. This is vital not only to protect public health and the environment but also to drive innovation and position the EU as a leader in building a truly sustainable, 21st-century economy.

Yours sincerely,
OBRIST Engineering
COVEME SPA
Endurance Solar Solutions, Inc.
Fenagy A/S
Solarge
UAB Refra

