

# Call for evidence on Perfluorohexane-1-sulphonic acid, its salts and related substances

**This consultation takes place as part of Norwegian Environment Agency's preparation of an Annex XV restriction dossier on PFHxS and PFHxS-related substances. The Norwegian Environment Agency intends to submit the restriction dossier for PFHxS and PFHxS-related substances on 12 April 2019. A separate and targeted stakeholder consultation by our consultant RPA on this restriction proposal is also ongoing.**

The Norwegian Environment Agency calls for information to identify uses of Perfluorohexane-1-sulphonic acid, its salts and related substances (hereafter referred to as PFHxS and PFHxS-related substances). The information will be used in the assessment of socio-economic consequences of the restriction proposal, including the feasibility of alternatives in the preparation of an Annex XV restriction dossier. The information will also be used in the global regulation process for [PFHxS and PFHxS-related substances](#) under the Stockholm Convention.

PFHxS and its salts were identified as substances of very high concern due to their vPvB properties according to Article 57(e) of REACH in July 2017. The concerns for PFHxS and PFHxS-related substances are similar to other regulated per- and polyfluorinated substances (PFASs). The Norwegian Environment Agency therefore expects that the restriction proposal will be similar to [previous restrictions](#) and restriction proposals on PFASs under REACH or under the [POPs regulation](#). This might implicate that the limit values will be low, and that articles, substances and/or mixtures containing impurities of PFHxS and PFHxS-related substances could be affected. However, this will become clearer during the development of the restriction proposal and when taking into consideration information from this stakeholder consultation.

PFHxS and PFHxS-related substances may be present in fire-fighting foams, food contact materials water/stain-proofing agents, cleaning and polishing products (as surfactants or surface protection agents). PFHxS and PFHxS-related substances may also be present in electronic equipment, semiconductors and metal plating<sup>1,2</sup>. These substances have been used as raw materials to produce PFAS-based products and are also unintentionally produced during industry processes<sup>3</sup>, for example, PFHxS is a known impurity in the production of PFOS<sup>3</sup>. The available information suggests that it is technically possible to substitute PFHxS and PFHxS-related substances in a range of applications and that there may be suitable non-fluorinated alternatives on the market. It is not clear, however, whether companies are facing specific challenges in substitution, or how much time would be needed to overcome possible obstacles.

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<sup>1</sup> Bipro and ETH Zürich (2018): Investigation of sources to PFHxS in the environment. Available at: <http://www.miljodirektoratet.no/Documents/publikasjoner/M961/M961.pdf>

<sup>2</sup> TÜV SÜD (2017): EU – 17<sup>th</sup> Public Consultation on REACH Candidate List. Available at: <https://www.tuv-sud.com/home-com/resource-centre/publications/e-ssentials-newsletter/consumer-products-e-ssentials/e-ssentials-5-2017/eu-17th-public-consultation-on-reach-candidate-list>

<sup>3</sup> Persistent Organic Pollutants Review Committee Thirteenth meeting (2017): Proposal to list perfluorohexane sulfonic acid (CAS No: 355-46-4, PFHxS), its salts and PFHxS-related compounds in Annexes A, B and/or C to the Stockholm Convention on Persistent Organic Pollutants. Available at: <http://chm.pops.int/Convention/POPsReviewCommittee/Chemicals/tabid/243/Default.aspx>

The Norwegian Environment Agency invites anyone who could be affected by this possible restriction or who holds relevant information to give comments as soon as possible and before 22 August 2018 by filling the web form available at: [https://comments.echa.europa.eu/comments\\_cms/CallForEvidence.aspx?RObjctId=0b0236e1827f87da](https://comments.echa.europa.eu/comments_cms/CallForEvidence.aspx?RObjctId=0b0236e1827f87da)

This call for evidence does not replace the public consultation for the restriction proposal that will take place after the proposal has been submitted to ECHA.

Please note that the Norwegian Environment agency is being supported in the preparation of the Annex XV dossier by an independent consultant, Risk Policy Analysts (RPA). RPA will be collecting more in-depth information on the uses, emissions and alternatives (chemical and non-chemical) of PFHxS and PFHxS-related substance.

Any information provided will be used, amongst other issues, to determine if any derogations are required for any potential restriction that is proposed. However, derogations cannot be proposed without adequate information on risk and socio-economic information, including alternatives. If a derogation is not proposed in the initial restriction proposal, it will be incumbent on relevant stakeholders to provide a full justification based on a comprehensive information on risk, socio-economic elements and alternatives, during the opinion-making process.

*RPA may have already approached you or your organisation on this subject. If you have submitted or plan to submit information to RPA in the context of this work, there is no need to resubmit the information by answering this call for evidence. Also, if you have more detailed information to provide, we would be grateful if you participate in the stakeholder consultation held by RPA. The Survey can be found here: <http://rpaltd.co.uk/PFHxS-consultation> Please note that the deadline for the RPA survey is 29 July 2018.*

## Questions:

1. Please explain your interest in PFHxS and PFHxS-related substances. For example, your role and activities in the supply chain (manufacturer/importer/distributor/user).
2. Are there uses for which technically and economically feasible alternatives exist for PFHxS and PFHxS-related substances? If so, please list and describe both the uses and the corresponding alternatives. Non-fluorinated alternatives are of particular interest.
3. Specify what challenges can be foreseen to substitute PFHxS and PFHxS-related substances? Please list and describe the uses here and explain why the substitution is challenging.
4. For the uses identified in question 3: list potential alternatives and describe why these are not used. Information may include technical difficulties, economic impacts of switching, availability or other. Non-fluorinated alternatives are of particular interest
5. For the uses identified in the responses to previous questions: what is the time frame needed to adapt the relevant processes? Non-fluorinated alternatives are of particular interest
6. Please provide any environment or human health exposure data on PFHxS and PFHxS related substances? (full reference or links to the reports is appreciated)

7. Is there anything else you would like to emphasise for the Norwegian Environment Agency to consider in the preparation of the restriction dossier?