

DXC CDX WEBINAR | Sept 22, 2025

PFAS Regulatory Updates for Key Global Markets EU, US, & UK

This session will be recorded.



Webinar Housekeeping

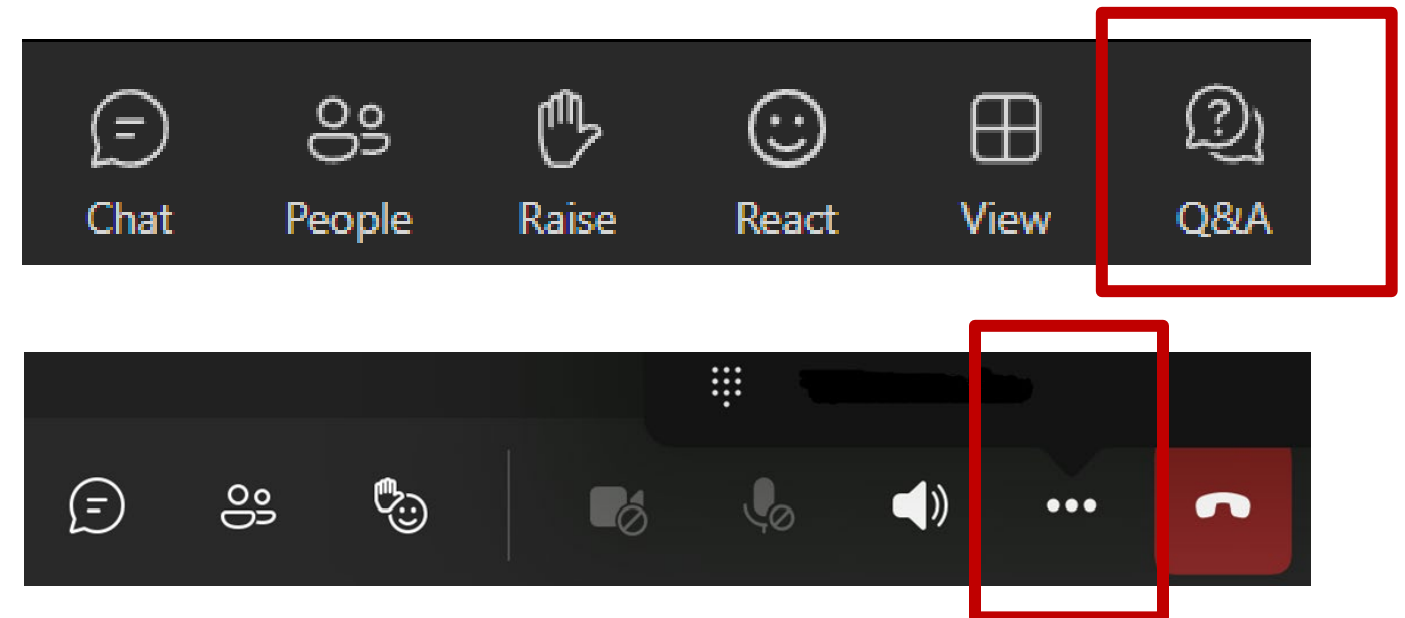
 This session is being recorded

 Participant audio and video are disabled

 Post questions using the Q&A

 cdx-info@dxcc.com

If you wish to avoid sharing personally identifiable information, do not provide private information during webinar entry or during the session.



DXC at a glance

\$12.87B

FY25 revenue

60+

years of innovation delivering mission-critical systems for customers

120,000+

employees worldwide

70+

countries

50,000

Engineers

200

customers in the Fortune 500

200+

partner ecosystem with best-of-breed partners

49,000

Partner certifications

In Business since 2011

DXC leveraged the lessons learned while providing IMDS to create CDX

30,000+

Chemical Abstract System (CAS) substances found in common products

10,000+

Of standard metals with compositions and norms

Compliance & Privacy Certifications

- ISO 9001 Quality Management
- ISO/IEC 27001 Information Security Management
- ISO 50001 Energy Management
- SOC1 & SOC2
- TiSAX

Memberships

CDX is an active member and partner of several international associations, where we work closely with various industry players to ensure the best use of our products.



11.6k+

Companies
registered

40.3k+

Active users

~1MM

Material
Declaration
Sheets (MDSs)

50.5k+

Conflict Minerals
Declarations
(CMDs)

Speaker Introduction

Chuck LePard

Executive Consultant, IMDS & CDX Americas Representative

Chuck.Lepard@dxc.com

[LinkedIn Profile](#)

- **Degrees in Electrical & Computer Engineering and Computer Science**
- **Honorable Discharge, United States Navy**
- **40 Years EDS/General Motors/Hewlett Packard/HPE / EntServ / DXC**
- **Decades of plant floor and engineering experience in related areas**
- **Advisor to multiple manufacturing industry groups**
 - Automotive Industry Action Group, International Aerospace Environmental Group,
 - Association of Equipment Manufacturers, Responsible Materials Initiative
- **Leader in Standards Development organizations**
 - American National Standards Institute (ANSI), International Standards Organization (ISO) Technical Committee TC-111 on Environmental Sustainability Data Exchange
 - IPC 2-18 175x family for Product Declaration and Compliance reporting



Speaker Introduction

Will Martin

Managing Director of EPR Consulting Ltd

- **Provider of Chemical Service to DXC Technology, managing substance & regulatory updates in IMDS & CDX**
- **DXC Training partner for UK**
- **Consultant to ACEA supporting Substance Impact Assessment Process (SIAP), and GADSL processes**
- **Member of Institute of Sustainability and Environmental Professionals (ISEP)**
- **Developed software and data to support M&P compliance and risk assessments, integrated with product development for aerospace companies**



Will.Martin@epr-consulting.co.uk

[Linkedin profile](#)

Speaker Introduction

Monika E. Kotkowska

Senior CDX Consultant / Regulatory Product Compliance Expert

Monika.Kotkowska@dxc.com

[LinkedIn profile](#)

- Specializes in Regulatory Product Compliance, ESG, and Chemical Management Solutions
- Currently pursuing a Master of Business Administration (MBA) with a focus on ESG topics
- Certified Agile and PRINCE Project Manager.
- Holds a Master's degree in Chemistry and Engineering from the University of Technology in Wroclaw, Poland.
- Over a decade of experience in diverse regulatory RA.
- Actively involved in IAEG, AIAG, and more recently, AEM.
- Outside of work, a true travel backpacker at heart.



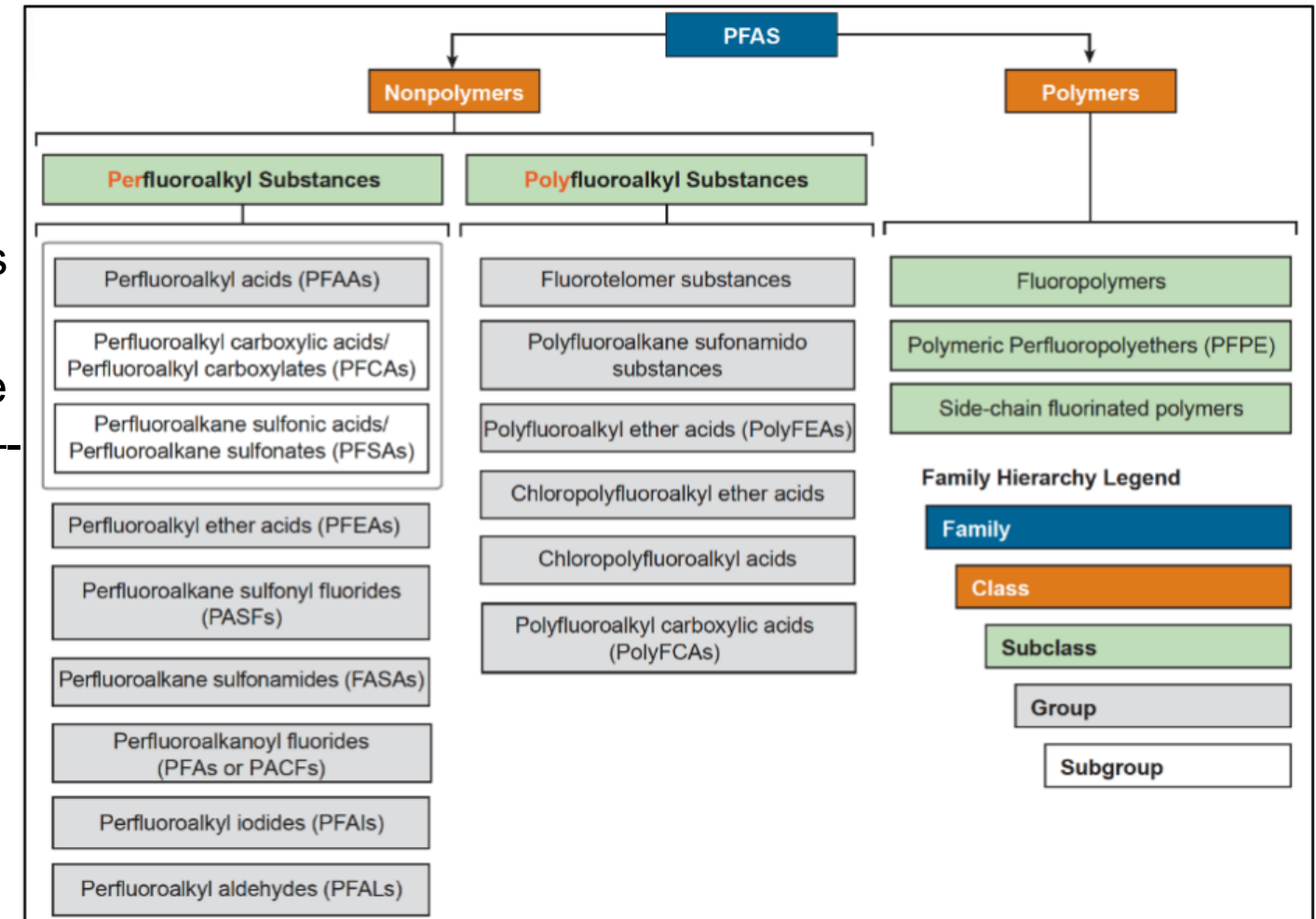
Agenda

- 1** Overview of PFAS and their significance
- 2** In-depth analysis of the PFAS regulatory landscape in the EU
- 3** PFAS regulatory developments in the UK
- 4** The current state of PFAS regulations in the US
- 5** Strategies for narrowing down PFAS data collection from 15k to 3k
- 6** Live demonstration of the CDX System
- 7** Interactive Q&A session with our expert panel



“Forever chemicals” – Definitional Complexities

- **Extensive Family of Chemicals:** PFAS are a large family of more than 10,000 synthetic chemicals.
- **Regulatory Challenges:** Different regulatory bodies and scientific organizations may adopt varying criteria for what constitutes a PFAS, leading to inconsistencies in definitions [2].
 - **OECD** (one or more fully fluorinated methyl or methylene carbons without a chlorine, bromine, or iodine attached — CF₃ or —CF₂—)
 - **U.S. TSCA 8(a)7 Reporting Rule** (three structural definition)
 - **State of Maine, California and other states** (at least one fully fluorinated carbon atom C-F)
 - **UK Regulatory Management Options Analysis (RMOA)** (two or more contiguous perfluorinated methylene groups)
- **Industry Influence:** The definition of PFAS can have significant regulatory and economic implications.



Source: *Naming Conventions for Per- and Polyfluoroalkyl Substances (PFAS)*; The Interstate Technology & Regulatory Council (ITRC); Sep 2023.

PFAS: Double-Edged Sword of Chemistry

The Paradox: The same properties that make PFAS incredibly useful – their stability and durability – also make them persistent environmental pollutants.

Unique Properties

- Exceptional chemical & thermal stability
- Water and oil repellency
- Durability & resistance to degradation
- Non-stick and stain-resistant

Health Implications

- Potential links to cancer
- Hormonal disruption
- Immune system effects
- Developmental issues in children
- Liver and kidney damage



Lifecycle and Contamination

- Raw Material Extraction
- Fluorinated Polymer Production
- Product Manufacturing
- Product Use
- Waste Management

Environmental Concerns

- Bioaccumulation in living organisms
- Long-lasting presence in soil and water
- Potential health risks to humans and wildlife
- Challenging to remove from the environment

PFAS Applications in Automotive Components

Lubricants

(Fluoropolymer)

- ESP systems
- Chain guides in automotive engines
- Combustion engines
- Electrical components in brake systems
- Bearings and throttle sensors
- General lubrication applications
- Weather strips
- Electric and thermal protection of connectors in electronic systems

Corrosion inhibitor

(Monomeric PFAS: PFOS, PFOA, PFHxS)

- Protect electrodes from aggressive electrolytes and achieve corrosion inhibition.
- Coating for separator film in Li-Ion batteries



Fire-resistant, oleo- & hydro- phobic Coatings

(Fluoropolymer & Monomeric PFAS: PFOA, PFOS, FTOHs)

- Aerosol spray paints and other paint coatings
- UV-stable coatings
- Cables and wire & cable insulation
- Coating of diesel & gasoline particle filter hoses
- High abrasion resistance in brake pads
- Coating of insulation materials
- O-Rings and other gaskets & seals

Tyres

(Fluoropolymer)

- Non-stick coating in manufacturing process

Heat exchange system fluid/gases

F-Gases such as Freon

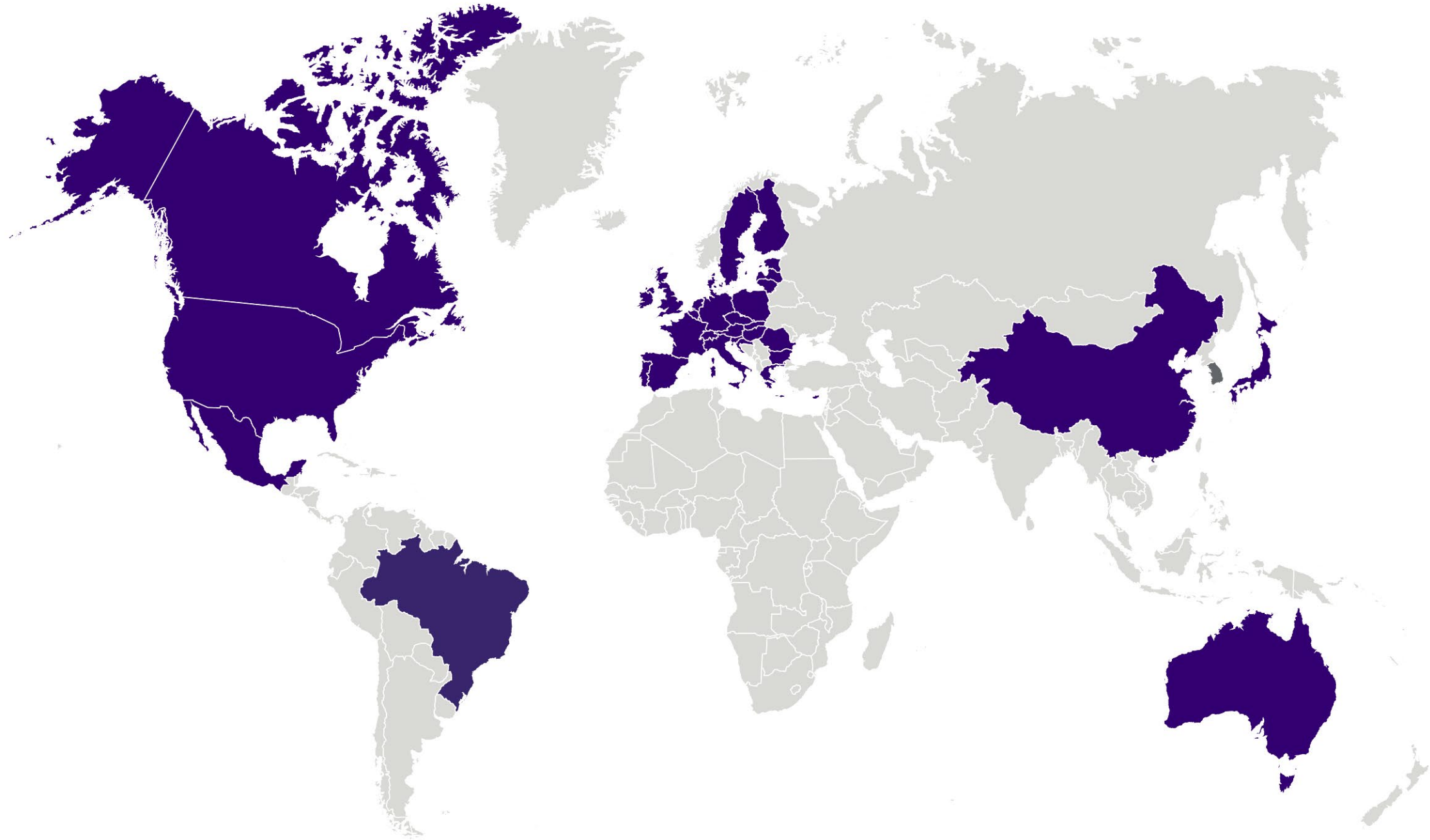
Engine Cooling / Radiator systems

Cabin Air Conditioning

Electronics & Fluidics (Fluoropolymer)

- Membranes
- Hoses
- Seals

PFAS Global Regulatory Landscape



Agenda

- 1** Overview of PFAS and their significance
- 2** In-depth analysis of the PFAS regulatory landscape in the EU
- 3** PFAS regulatory developments in the UK
- 4** The current state of PFAS regulations in the US
- 5** Strategies for narrowing down PFAS data collection from 15k to 3k
- 6** Live demonstration of the CDX System
- 7** Interactive Q&A session with our expert panel



2025 Updates to EU POPs Regulation

PFOS restricted 2009 → exemptions removed 2020 → PFOA banned 2020 → PFHxS banned 2023 → 2025: PFOS limits tightened; PFOA foam rules adjusted

PFOS — Delegated Reg. (EU) 2025/718

- **Scope:** aligned with PFOA entry — “Perfluorooctane sulfonic acid (PFOS), its salts and PFOS-related compounds,” incl. derivatives.
- **UTC limits:**
 - PFOS (incl. salts): ≤ 0.025 mg/kg in substances, mixtures or articles.
 - Sum of PFOS-related compounds: ≤ 1 mg/kg in substances, mixtures or articles.
- **Derogation removed:** mist suppressant in non-decorative hard chromium(VI) plating deleted.
- **Effective date:** Applies from 3 December 2025.

PFOA — Delegated Reg. (EU) 2025/1399

- **Definition added:** “Firefighting foams means any mixture to fight fires with foam and includes firefighting foam concentrates and firefighting foam solutions.”
- **Deadline extended:** exemption for PFOA-containing firefighting foam already installed in systems now expires on 3 December 2025 (was 4 July 2025).
- **Interim UTC limits:** for existing Class B foams/foams concentrates (until 3 Aug 2028):
 - PFOA (incl. salts) ≤ 1 mg/kg.
 - Any individual PFOA-related compound or combination ≤ 10 mg/kg.
- **After cleaning:** fluorine-free replacement foams may contain a carry-over sum of PFOA + salts + PFOA-related compounds ≤ 10 mg/kg from cleaned equipment.
- **Action:** audit legacy systems and decontamination plans.

2025 EU REACH updates



January 2025 SVHC Update

- ECHA added 5 new substances to the SVHC Candidate List on **January 21, 2025**, bringing the total to 247 entries.
- **Perfluamine** (EC 206-420-2, CAS 338-83-0) added for vPvB properties (very persistent and very bioaccumulative).
- Used in manufacture of electrical, electronic and optical equipment, machinery and vehicles.



Annex XVII (Restrictions)

- No new PFAS-wide restriction was formally added to Annex XVII in 2025.
- The major PFAS restriction is Entry 79, covering PFHxA, adopted in 2024.
- Staged compliance dates:
 - October 2026 for most products (textiles, footwear, cosmetics, food contact)
 - October 2029 for civil aviation foams.



PFAS Restriction Dossier: RAC/SEAC Progress

- **August 2025:** Dossier Submitter releases major proposal update.
- **RAC/SEAC Progress:** Provisional conclusions reached for medical devices, lubricants, and transport.
- **Next Steps (Sept-onwards):** **Committee meetings to continue** for electronics, energy, manufacturing, and other key sectors.

August 2025 PFAS Proposal Update

Based on over 5,600 public comments, the five national authorities (Denmark, Germany, the Netherlands, Norway, and Sweden) have updated the restriction proposal.

Key changes include:

1. The Background Document, submitted to ECHA on 24 June 2025, now covers assessments for 8 additional sectors:

- Printing & Sealing application
- Machinery & Military applications
- Explosives & Technical textiles
- Other medical & industrial uses

2. ECHA's RAC and SEAC

will finalize their opinions on the original 14 sectors, PFAS manufacturing, and horizontal issues (e.g., reporting requirements) by end-2025. Sector-specific evaluation of the eight newly assessed sectors is deferred to avoid extending the process beyond 2026.

3. Timeline & Next Steps:

- End 2025: Conclude committee discussions on the 14 original sectors, PFAS manufacturing, and horizontal measures.
- 2026: Final RAC & SEAC opinions delivered to the European Commission, covering > 90% of PFAS emissions and volumes.
- The Commission will propose legal measures under its Chemicals Industry Action Plan “as soon as possible” after receiving ECHA's opinions.

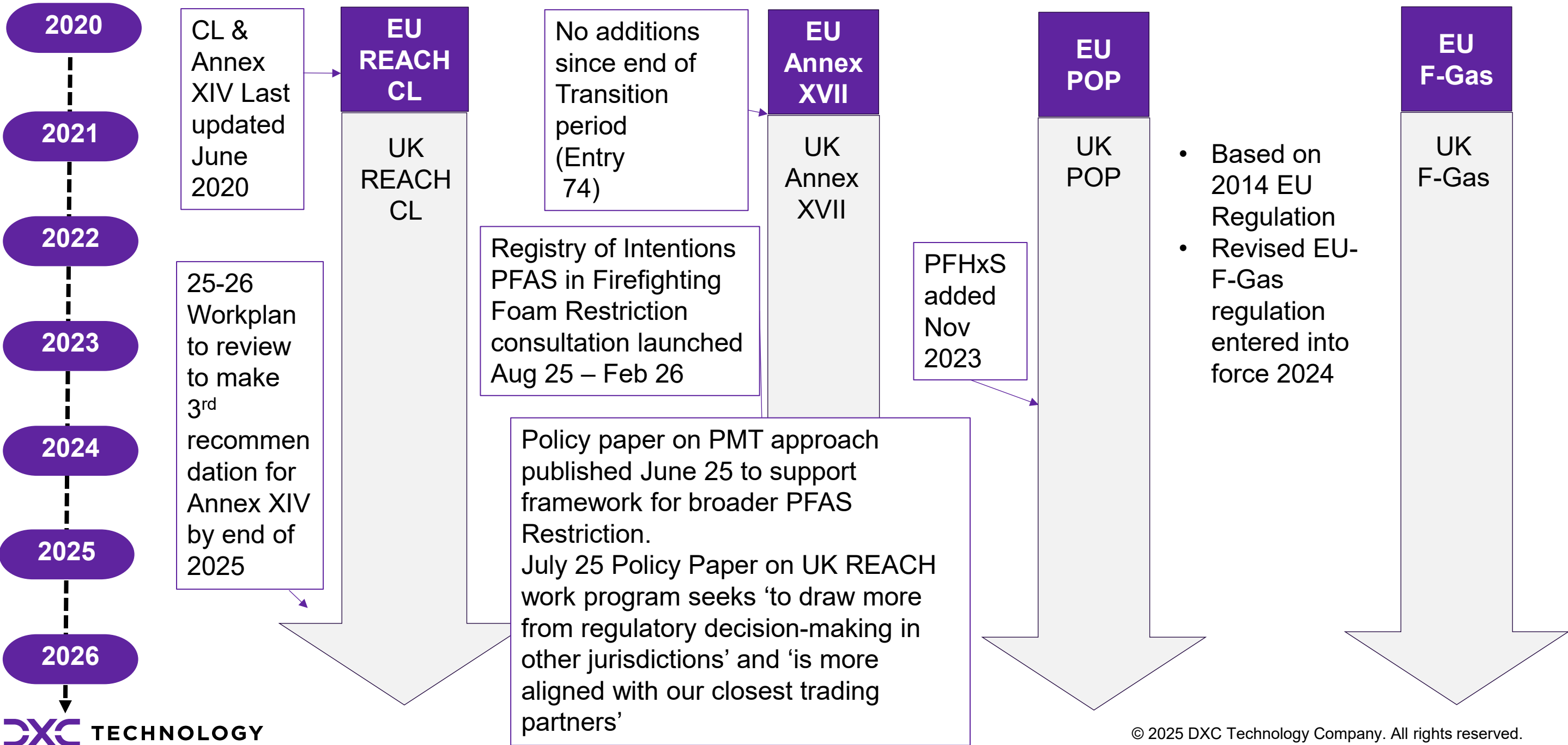


Agenda

- 1** Overview of PFAS and their significance
- 2** In-depth analysis of the PFAS regulatory landscape in the EU
- 3** PFAS regulatory developments in the UK
- 4** The current state of PFAS regulations in the US
- 5** Strategies for narrowing down PFAS data collection from 15k to 3k
- 6** Live demonstration of the CDX System
- 7** Interactive Q&A session with our expert panel



PFAS Regulatory Landscape in UK



Agenda

- 1** Overview of PFAS and their significance
- 2** In-depth analysis of the PFAS regulatory landscape in the EU
- 3** PFAS regulatory developments in the UK
- 4** The current state of PFAS regulations in the US
- 5** Strategies for narrowing down PFAS data collection from 15k to 3k
- 6** Live demonstration of the CDX System
- 7** Interactive Q&A session with our expert panel



TSCA Section 8(a)(7) PFAS Reporting & Recordkeeping

Overview

- Requires reporting on per- and polyfluoroalkyl substances (PFAS) manufactured or imported since between January 1, 2011 – December 31, 2022
- Rule requires information for each year in which PFAS was manufactured or imported

Who Must Report:

- Any person who has manufactured (including imported) PFAS for commercial purposes
- Includes manufacturers of any amount - no de minimis exemption

20 December 2019

The National Defense Authorization Act (NDAA) introduce regulatory measures

13 November 2023

TSCA 8(a)(7) went into effect

13 October 2026

The EPA reporting window closes **for most entitles**

13 April 2027

The EPA reporting window closes **for small manufacturers**

8-26 September 2025

U.S. E.P.A. Common Data Exchange Industry testing

11 April 2026

The reporting **start date**

Amara's Law (Minnesota PFAS Pollution Prevention Act)

Enacted June 2023, this law phases out non-essential PFAS uses to safeguard public health, the environment, and Minnesota's economy by avoiding costly cleanup. *Named for Amara Strande - diagnosed with a rare cancer linked to PFAS exposure—this law reflects Minnesota's 'prevention first' PFAS blueprint.*



Phase 1 | Jan 1 2025

Ban PFAS in 11 consumer-product categories (e.g., cookware, textiles, cosmetics)



Phase 2 | Jul 1 2026

Mandatory manufacturer reporting of PFAS content in all products.

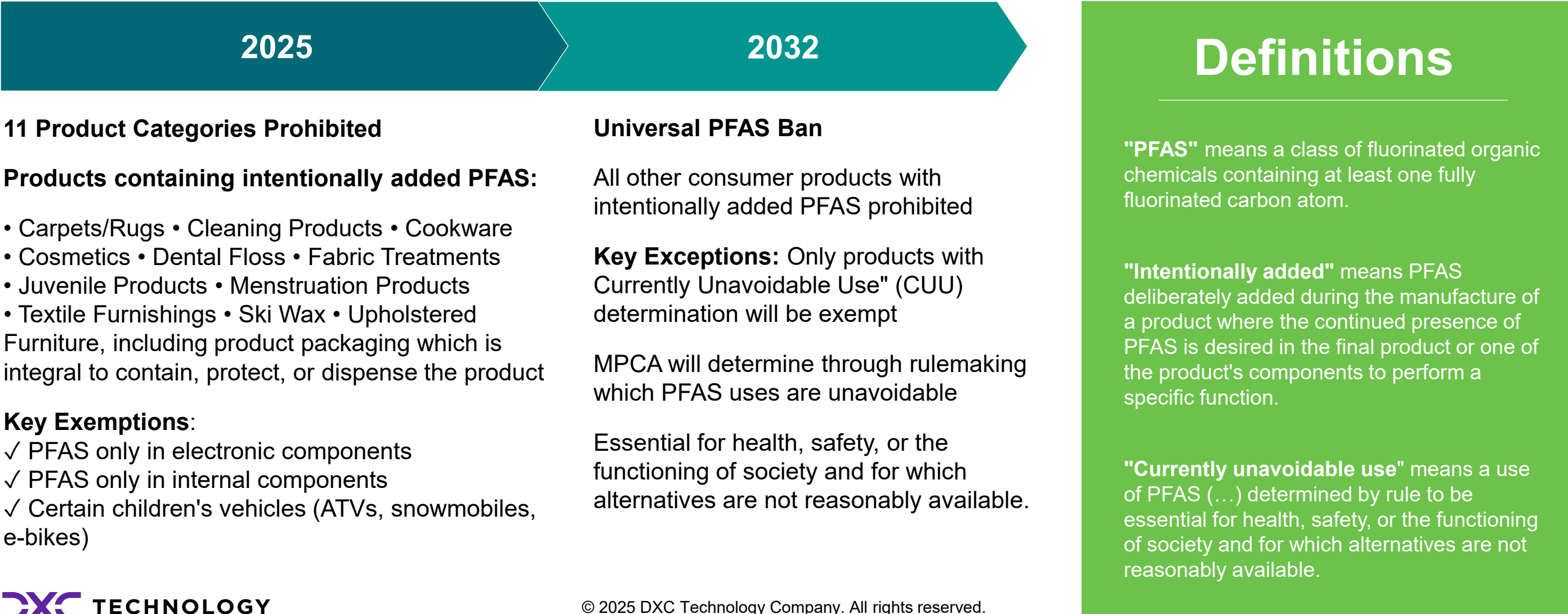


Phase 3 | Jan 1 2032

Complete PFAS ban in products by Jan 1 2032, except for MPCA-approved 'Currently Unavoidable Uses.'

Minnesota PFAS Prohibition: Understanding Amara's Law

Beginning January 1, 2025, any product sold or distributed in Minnesota with intentionally added PFAS in 11 designated categories is prohibited; on January 1, 2032, the ban extends to all consumer products unless granted a CUU exemption by the Minnesota Pollution Control Agency (MPCA). Violations carry civil penalties of up to \$10,000 per day (or \$25,000 per day for knowing or willful violations) plus potential injunctive relief.



Minnesota HF1597: PFAS Product Reporting Overview

No final rule released yet !

Effective Date: July 1, 2026 (primarily January, 1 2026)

Responsible Party: A “manufacturer” is the company that produces or brands a product sold in Minnesota.

- If the brand owner is outside the U.S., the importer assumes reporting duties.
- Parties may designate another entity via written agreement

Scope: Only products and component with **intentionally added PFAS** sold, offered for sale, or distributed in Minnesota since January 1, 2026, require reporting. Removing intentional PFAS before that date exempts the product.

Exemptions: Reporting is not required for:

- Products mandated by federal law to contain PFAS (e.g., certain medical devices)
- Firefighting foam covered by existing rules
- Secondhand or used goods
- Agricultural products with a special waiver
- Items subject to national security classification

Fees are required to submit:

- **\$1,000** for the initial report
- **\$500** for annual update or annual recertification

May 2023

Reporting requirements for PFAS in products were signed into law



Fall 2025

Rulemaking is finalized and the reporting system is available for testing



1 July 2026

Initial reports for PFAS in products due



1 February 2027

first annual update or recertification due



Minnesota HF1597: PFAS Product Reporting Overview

Initial Report Due: July 1, 2026

Manufacturers can request extensions or MPCA may grant waivers

Annual Updates: Required by **February 1 each year** if product changes are made or new products are introduced. Must update whenever there are significant changes in PFAS content or product composition.

Recertification: If no new information is available, then an update is not required, and a recertification of the existing report is required instead.

Fees: Associated with both updates and recertifications.



Extension Requests

- Submit at least **30 days** before deadline
- **Fee:** \$300 per extension request
- **Maximum Extension:** 90 days (must be approved by MPCA)



Documentation:

- Maintain all compliance documentation (**emails, letters, supplier responses**) for **at least five years**
- Records must be readily accessible for MPCA audits



Waivers:

- May be granted if equivalent info is already **publicly available**
- Must be approved by MPCA
- Annual waiver **fee:** \$1,000
- Waivers do not exempt from annual reporting fees

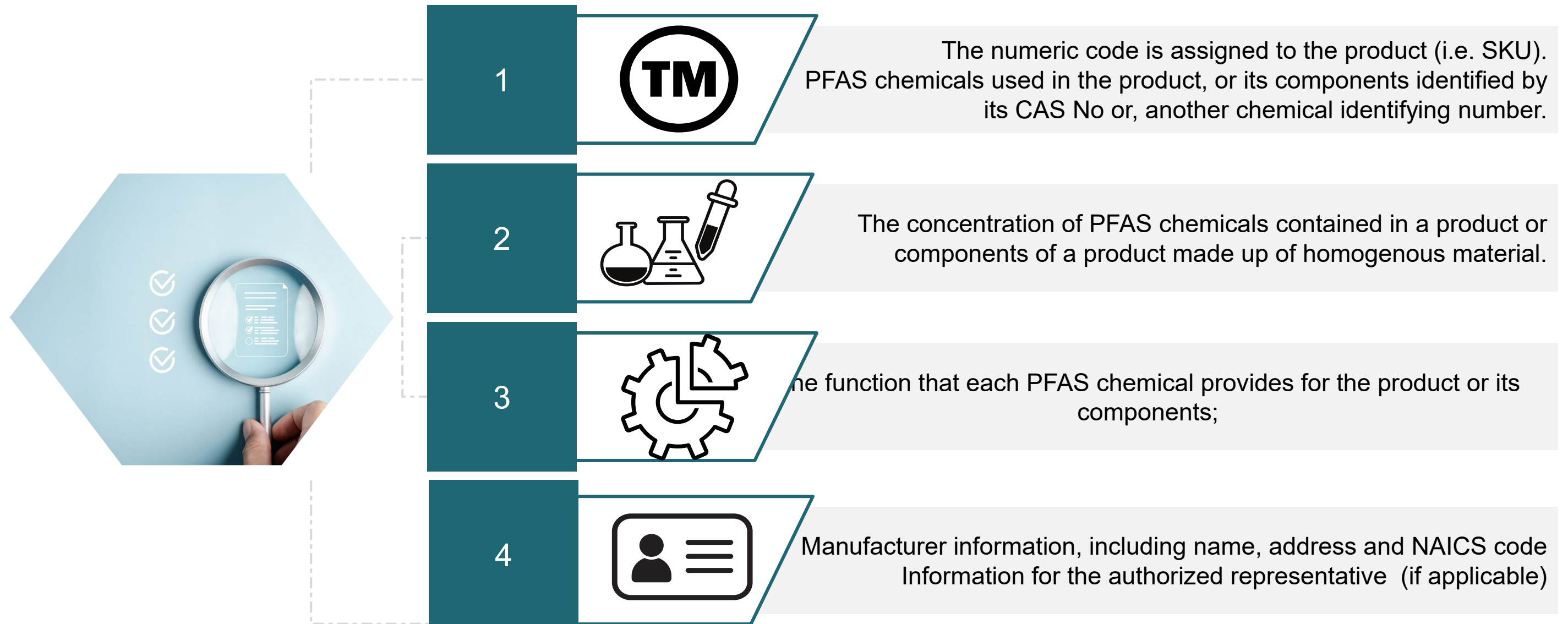


Due Diligence Requirements:

- Actively request PFAS data from all suppliers until all product information is collected
- Provide evidence of due diligence to authorities if asked

Essential Data Requirements for PFAS Reporting

The components can be grouped if they are the same, in the same concentration range, provide the same function, and have the same form and function but differ in size, color or other superficial qualities. The manufacturer must provide:



Maine PFAS in Products Law – Scope & Milestones

Maine’s PFAS in Products Law bans the sale, offer for sale, or distribution of products with intentionally added PFAS. This prohibition is effective immediately for all covered products, including those already in the stream of commerce.

2023 - Present



3 months left

2026



2029



2032



2040



- Carpets, rugs, fabric treatments with intentionally added PFAS
- Products in fluorinated containers

- Cleaning products | Cookware | Cosmetics
- Dental floss | Juvenile products | Menstruation products
- Textile articles* | Ski wax | Upholstered furniture

*Excludes outdoor apparel for severe wet conditions and vehicle/aircraft components

- Artificial turf
- Outdoor apparel for severe wet conditions

- Any products unless the use of PFAS in the product is a currently unavoidable use.

- Cooling, heating, ventilation, air conditioning or refrigeration equipment.
- Refrigerants, foams or aerosol propellants.

Exemptions & CUU Process

No general PFAS reporting requirements. Reporting is required **only for products granted a CUU**.

A. Exempt Products (no CUU needed):

- ✗ Federal-regulated (FDA, USDA, EPA) items (Medical devices, drugs, Veterinary products)
- ✗ Transportation equipment (motor vehicles, aircraft, watercraft)
- ✗ Packaging (except of fluorinated container or container that otherwise contains intentionally added PFAS, or when the packaging itself is sold as a product).
- ✗ Used product or used product component
- ✗ Firefighting or fire-suppressing foam
- ✗ Products developed for public health, environmental, or water quality testing
- ✗ Semiconductors, including equipment and materials used in manufacturing
- ✗ Non-consumer laboratory equipment or electronics
- ✗ Equipment directly used in the manufacture or development of the above-exempted

B. CUU Criteria & Timeline:

Definition: Use essential for health, safety or societal functioning with no reasonably available alternatives

CUU application: 60 to 18 months before prohibition (no fee), 5 years (renewable), must be submit to PFASProducts@maine.gov

- 2026 products: proposals due June 1, 2025
 - 11 proposals for 2026 ban – only *cleaning-container components* (vented cap liners & cartridge valves) approved
- 2029 products: proposals due July 1, 2027
- 2032 products: proposals due July 1, 2030

C. Notification & Cost

Notification fee: \$1,500 per notification, due when you formally notify DEP that you're continuing to sell a CUU-approved product (manufacturers with >100 employees only). Notification must include all information required under Section 3 of Chapter 90 (unless waived via substantially equivalent public information).

New Mexico PFAS Protection Act – Phase Implementation

New (April, 9 2025) Mexico PFAS Protection Act ([HB 212](#)) establishes a four-phase timeline **to eliminate intentionally added PFAS** in consumer and industrial products, with notification and reporting requirements beginning in January 2026, escalating to a statewide ban on all non-exempt PFAS-containing products by January 2032.



Phase 1: First Wave Prohibitions & Reporting Deadline (Effective January 1, 2027)

- **Prohibited products:** Cookware, Food packaging, Dental floss, Juvenile products, Firefighting foam
- Electronics exemption: Personal computers, associated peripheral devices gaming consoles, phones NOT included in juvenile products
- **Mandatory product-level reporting** to NMED on PFAS usage and alternatives.



Phase 2: Second Wave Prohibitions (Effective January 1, 2028)

- **Additional prohibited products:** Carpets/rugs, Cleaning supplies, Cosmetics, Fabric treatments, Feminine hygiene products, Textiles/textile furnishings, Ski wax, Upholstered furniture



Phase 3: Comprehensive PFAS Ban (Effective January 1, 2032)

- Ban on **all intentionally added PFAS** in products, unless:
- Granted a Currently Unavoidable Use (CUU) designation by the Environmental Improvement Board (EIB).
 - Covered under statutory federal exemptions.

Exemptions, CUU Applications & Manufacturer Actions

A. Exemptions:

- ✗ Semiconductors & manufacturing equipment
- ✗ Non-consumer electronics
- ✗ Non-consumer laboratory equipment
- ✗ HVAC/refrigeration equipment
- ✗ **Fluoropolymers with specific backbones**
- ✗ Products regulated by federal law (USDA-regulated medical devices, veterinary products, etc.)
- ✗ Motor vehicles & equipment, Watercraft and Aircraft
- ✗ Products for electricity generation/distribution

Affected Products:

- ✓ All other products with intentionally added PFAS after each phase—industrial machinery, consumer goods, packaging, textiles, cosmetics, etc.

B. Currently Unavoidable Use (CUU) Option:

- Application to Environmental Improvement Board (EIB) must demonstrate that PFAS is:
 - Essential for health, safety, or functioning of society.
 - No reasonably available non-PFAS alternatives exist.
- CUU designation grants temporary relief from prohibition."

C. Next Steps for Manufacturers (by January 1, 2027)

1. Identify all PFAS-containing products and potential CUU candidates.
2. Document supply chain: Raw materials, suppliers, formulations, and PFAS concentrations.
3. Implement reporting systems
4. Compile technical and economic justifications, search for alternatives, and draft petitions to EIB.

California SB 682: Comprehensive PFAS Product Ban

California's SB 682, enforced by the Department of Toxic Substances Control (DTSC) phases in prohibitions on intentionally added PFAS from 2027 through 2040, with no outright exemptions in Phase 1, escalating reporting and least-toxic requirements, and a CUU pathway for essential uses.



Phase 1: First Prohibitions & Reporting (Effective January 1, 2027)

- **Prohibited products:** Cleaning products, Cookware, Dental floss, Juvenile products, Food packaging, Ski wax
- **Reporting Deadline:** Manufacturers must report PFAS use to the Department of Toxic Substances Control (DTSC).
- **Substitution Requirement:** Use the least-toxic available alternatives.
- **Note:** No statutory exemptions; all covered products face an outright ban.



Phase 2: Second Wave Prohibitions (Effective January 1, 2035)

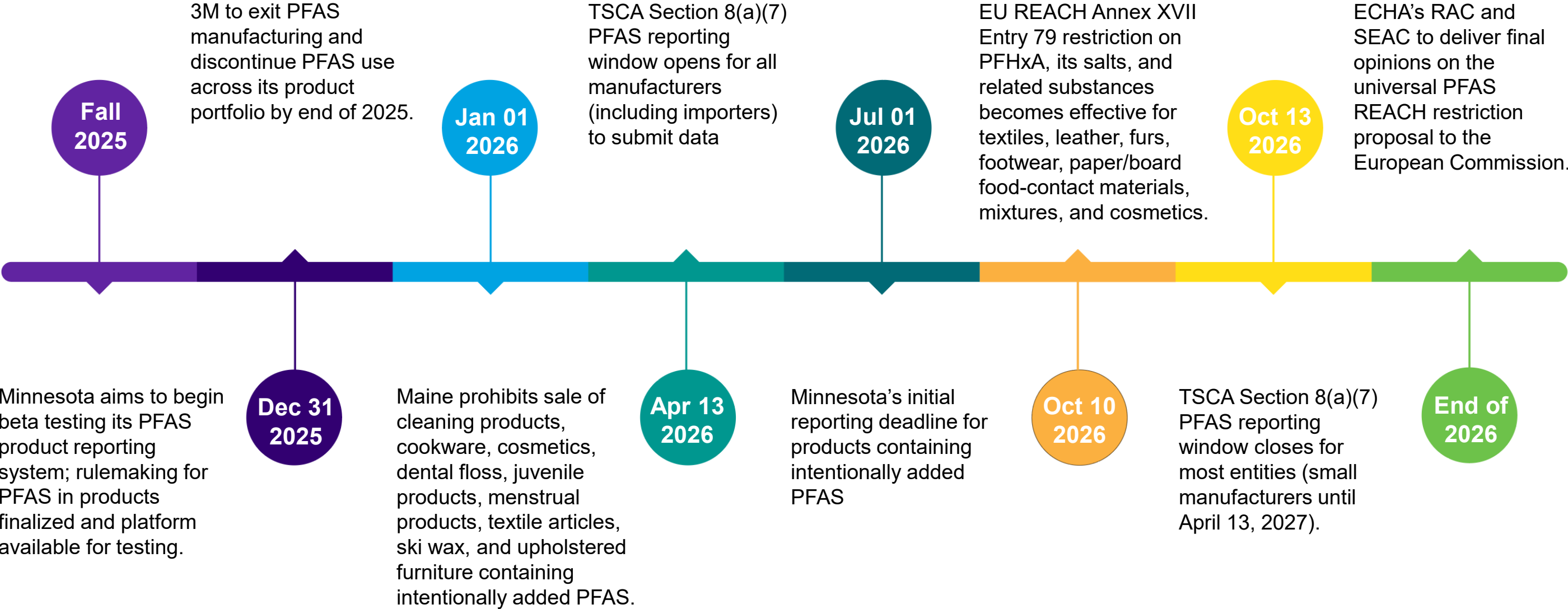
- **Scope:** All other consumer products containing intentionally added PFAS prohibited unless exempt
- **Currently Unavoidable Use (CUU)** exemption process available
- Expanded **"intentionally added"** definition includes manufacturing byproducts
- **Decision Standard:** DTSC applies the "broadest reasonable product category" when evaluating CUU or alternatives.



Phase 3: Comprehensive PFAS Ban (Effective January 1, 2040)

- **Full Ban:** All products containing intentionally added PFAS, unless granted CUU or under statutory federal exemptions.
- **Additional Covered Items:** Refrigerants, solvents, propellants, fire suppressants fall under the ban

Key Dates



Best Practice

1. Regulatory Monitoring and Engagement

- Subscribe to PFAS rulemaking updates from EPA, state agencies, ECHA, and other global regulators
- Join relevant industry consortia (AEM, AIAG, IAEG, MedTech Europe, etc.)

2. Product Assessment & Alternatives

- Inventory PFAS across all materials, components, and processes
- Prioritize high-risk applications (e.g., seals, coatings, cables)
- Evaluate and qualify non-PFAS alternatives; if none exist, pursue Currently Unavoidable Use (CUU) exemptions

3. Supply Chain Management

- Distribute standardized PFAS questionnaires
- Strategies to narrow down PFAS data collection
- Enforce escalation procedures for non-responsive or non-compliant suppliers
- Require supplier declarations with Total Organic Fluorine (TOF) test results below detection limits
- Submit high-risk products for TOF analysis when supplier data are unavailable

4. Third-Party Certification

Pursue PFAS-free certifications—confirm each program's PFAS definition and test thresholds

- Intertek PFAS-Free (< 20 ppm)
- NSF 537
- Green Seal (full PFAS prohibition)

Validate PFAS criteria in Cradle to Cradle, OEKO-TEX, GreenScreen Certified, MADE Safe

5. Documentation & Reporting

- Retain all correspondence, test reports, and CUU filings for ≥ 5 years
- Centralize records in a compliance platform (e.g., CDX)

6. Risk Management & Training

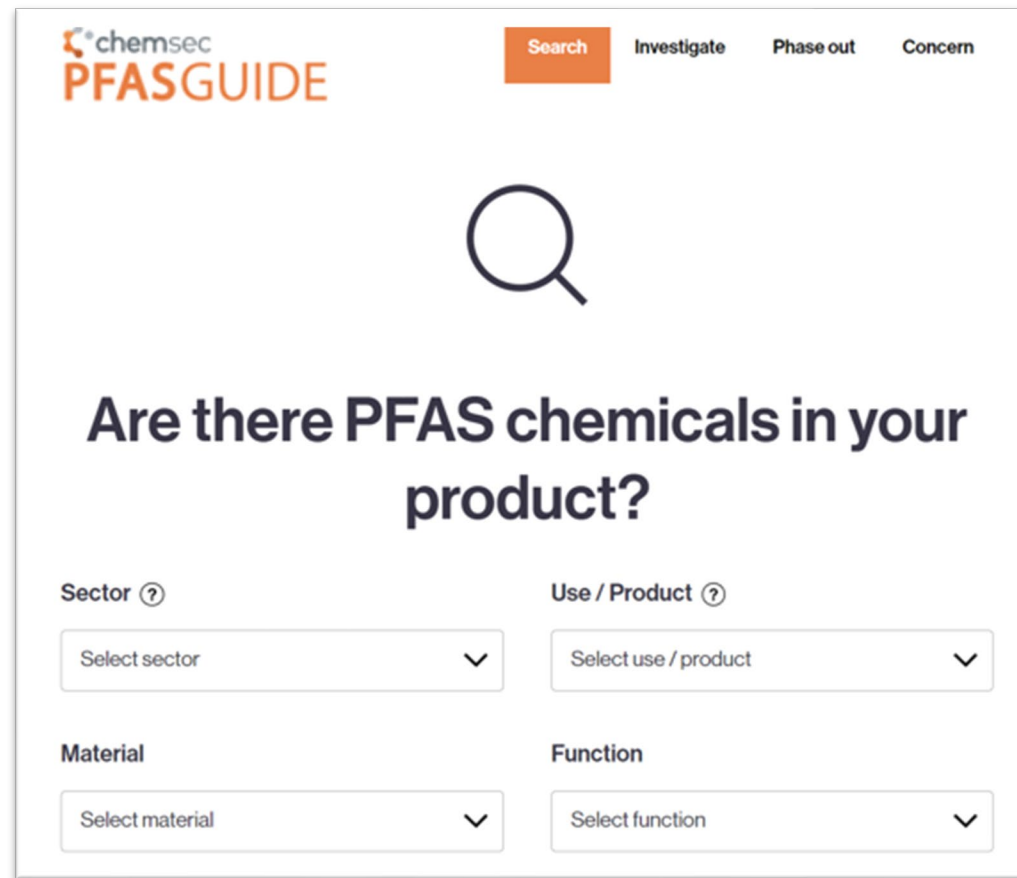
Perform product-category risk assessments (seals, coatings, electronics, etc.)

Educate procurement, R&D, and quality teams on PFAS-free design principles and regulatory updates

Uncover the presence of PFAS with online resources

ChemSec's PFAS Guide

serves as a starting point for **identifying common applications** within various industries/sectors and **provides potential alternatives** for some of these applications.



The screenshot shows the ChemSec PFAS Guide website. At the top, there is a navigation bar with the ChemSec logo, the text 'PFASGUIDE', and four buttons: 'Search' (highlighted in orange), 'Investigate', 'Phase out', and 'Concern'. Below the navigation bar is a large magnifying glass icon. The main heading asks 'Are there PFAS chemicals in your product?'. Below this heading are four dropdown menus arranged in a 2x2 grid. The top-left dropdown is labeled 'Sector' with a question mark icon and contains the text 'Select sector'. The top-right dropdown is labeled 'Use / Product' with a question mark icon and contains the text 'Select use / product'. The bottom-left dropdown is labeled 'Material' and contains the text 'Select material'. The bottom-right dropdown is labeled 'Function' and contains the text 'Select function'.

REACH Annex XV

Universal PFAS Restriction



ZeroPM Alternative Assessment Database

is an excel database to identify all types of alternatives to PMT substances and PFAS. Funded by the European Union's Horizon 2020 research and innovation programme under grant agreement No 101036756.

For each use category:

- List of sub-use(s) and application(s) of PFAS
- List of PFAS identified
- Non-exhaustive list of potential alternatives

Agenda

- 1** Overview of PFAS and their significance
- 2** In-depth analysis of the PFAS regulatory landscape in the EU
- 3** PFAS regulatory developments in the UK
- 4** The current state of PFAS regulations in the US
- 5** Strategies for narrowing down PFAS data collection from 15k to 3k
- 6** Live demonstration of the CDX System
- 7** Interactive Q&A session with our expert panel



Strategies for narrow down PFAS Data Collection

Challenges associated with PFAS Compliance

- Definition of PFAS is not universal
- Technically challenging to build substance lists based on a common functional group:
 - Not all chemical inventories contain molecular formulas or chemical names to identify relevant functional groups
 - Many PFAS are polymers or mixtures which may not have molecular formulas available
 - Substances may be confidential and precise chemistry unavailable
 - Large resource burden as potential scope is >10,000+ substances

→ As a result, industry heavily reliant on regulatory / international bodies to provide lists of PFAS

PFAS Lists in CDX

• TSCA Section 8a(7)

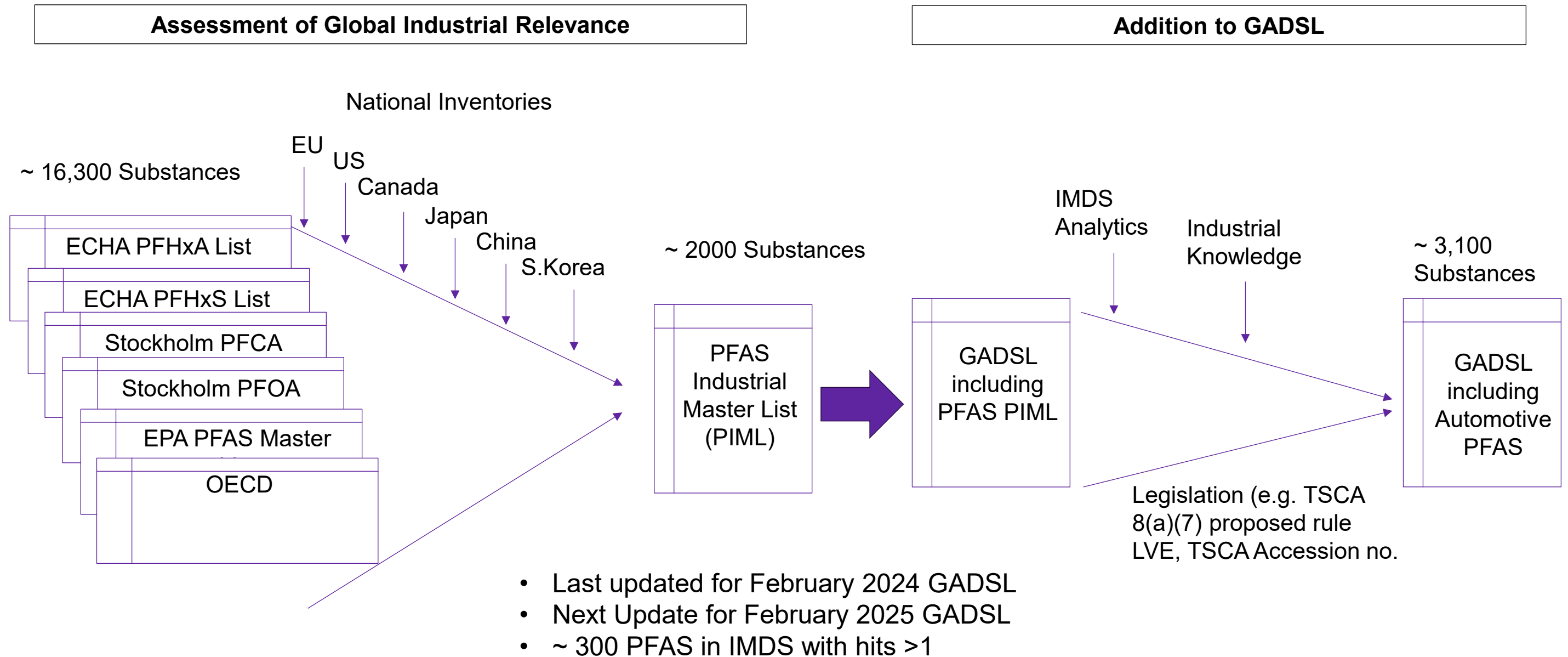
- Based on EPA derived lists of PFAS that meet the definition
- List developed from Proposed rule document which lists PFAS by CAS, LVE and TSCA Accession number; EPA list on CompTox, and public list of PFAS published by EPA on TSCA website.
- 11,466 substances

1. $R-(CF_2)-CF(R')R''$, where both the CF_2 and CF moieties are saturated carbons.
2. $R-CF_2OCF_2-R'$, where R and R' can either be F, O, or saturated carbons.
3. $CF_3C(CF_3)R'R''$, where R' and R'' can either be F or saturated carbons.

• PFAS Declarable Substance List

- Based on automotive industries GADSL list & approach to PFAS compliance

Strategies for narrow down PFAS Data Collection



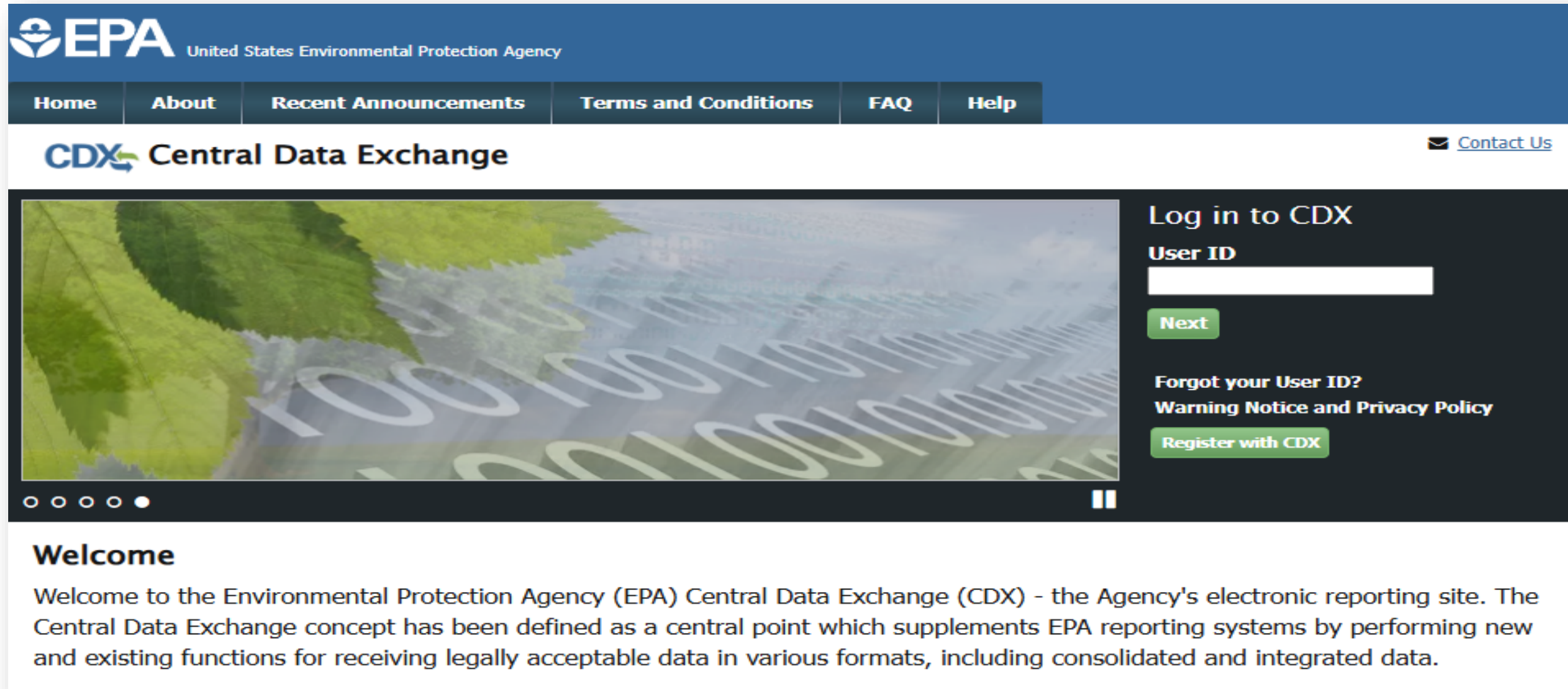
Agenda

- 1 Overview of PFAS and their significance
- 2 In-depth analysis of the PFAS regulatory landscape in the EU
- 3 PFAS regulatory developments in the UK
- 4 The current state of PFAS regulations in the US
- 5 Strategies for narrowing down PFAS data collection from 15k to 3k
- 6 Live demonstration of the CDX System
- 7 Interactive Q&A session with our expert panel



DXC Compliance Data eXchange (CDXSystem.com)

Do NOT confuse with U.S. EPA Central Data Exchange (cdx.epa.gov)!



The screenshot shows the homepage of the U.S. EPA Central Data Exchange (CDX). At the top is the EPA logo and the text "United States Environmental Protection Agency". Below this is a navigation bar with links: Home, About, Recent Announcements, Terms and Conditions, FAQ, and Help. To the right of the navigation bar is a "Contact Us" link with an envelope icon. The main header area features the "CDX Central Data Exchange" logo. Below the header is a large banner image showing green leaves and binary code. To the right of the banner is a login section titled "Log in to CDX" with a "User ID" input field, a "Next" button, and links for "Forgot your User ID?", "Warning Notice and Privacy Policy", and a "Register with CDX" button. Below the banner is a "Welcome" section with a paragraph of text.

EPA United States Environmental Protection Agency

[Home](#) [About](#) [Recent Announcements](#) [Terms and Conditions](#) [FAQ](#) [Help](#) [Contact Us](#)

CDX Central Data Exchange

Log in to CDX

User ID

[Next](#)

[Forgot your User ID?](#)
[Warning Notice and Privacy Policy](#)

[Register with CDX](#)

Welcome

Welcome to the Environmental Protection Agency (EPA) Central Data Exchange (CDX) - the Agency's electronic reporting site. The Central Data Exchange concept has been defined as a central point which supplements EPA reporting systems by performing new and existing functions for receiving legally acceptable data in various formats, including consolidated and integrated data.

A modern workspace with a large monitor, keyboard, mug, and plants. The monitor displays a blurred image of a person. The keyboard is a slim, light-colored model. A white mug sits on the desk. A potted plant with large green leaves is on the right. A pen holder with several pens is on the left. The background is a blurred office environment with more plants.

CDX Demo

Demo: Chemical compliance is more than REACH

CDX COMPLIANCE DATA EXCHANGE by DXC Technology

MDS Functions Administration Help

Component Search Ingredients Supplier data Recipient data Analysis MDS Request

Filter Common Regulations

PROD: REACH Candidate List

Operator Station PFAS Example

1x Instrument Panel

1x Dashboard

100.0kg Composite IP and Controls Overlay

0.0 - 0.55% Carbon

0.0 - 0.035% Phosphorus

0.0 - 0.035% Sulphur

0.0 - 0.35% Silicon

0.0 - 1.3% Manganese

0.0 - 1.7% Chromium

0.0 - 0.8% Molybdenum

0.0 - 0.35% Vanadium

0.0 - 0.08% Aluminium (metal)

0.0 - 0.3% Copper

0.0 - 0.02% Tin

0.0 - 0.005% Boron

97.1% Iron

0.0 - 0.06% Titanium

Rest 0.1075% Fluoroethylene-vinylether copolymer.

30.0kg ABS

80.0 - 90.0% ABS

5.0% GF-Fibre

3.0 - 5.0% Plasticizer, not to declare

5.0% Flame Retardant, not to declare

1.0% Ethene, tetrafluoro-, homopolymer

1x Trim

20.0kg + AS060 (hot-dip aluminium-silicium coated)

90.0% Aluminium (metal)

8.0 - 11.0% Silicon

0.5% Cyclotetrasiloxane, 2-(4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,11-heptafluoroundecyl)-2,4,6,8-tetramet

1x Operator Seat

1x Seat Frame

25.0kg HSLAS-F Grade 50 [340] (High-Strength Low-Alloy Steel with improved formability)

0.0 - 0.15% Carbon

0.0 - 0.15% Chromium

0.0 - 0.2% Copper

Rest 98.615% Iron

0.0 - 1.65% Manganese

0.0 - 0.06% Molybdenum

0.0 - 0.2% Nickel

0.0 - 0.02% Phosphorus

0.0 - 0.025% Sulphur

0.005 - 0.1% Vanadium

0.005 - 0.1% Titanium

0.005 - 0.1% Niobium

1x Seat Spring subassembly

12.0kg Spring Steel Wire SL EN 10270

Rest 98.19% Iron

0.4 - 1.2% Manganese

0.35 - 1.0% Carbon

0.1 - 0.3% Silicon

0.0 - 0.2% Copper

0.0 - 0.035% Phosphorus

0.0 - 0.035% Sulphur

1x Enhanced Foam Seat cover

4.0kg Seat Upholstery - Enhanced

50.0% Cotton-fibre

35.0% PA6+PA66+PTFE

Details

Common Information

Type Component

ID / Version 12484736 / 1

Node ID 12484736

Node Count 81

MDS Supplier CL Demo 3

100% declaration ☐

SCIP Compliance ☐

External SCIP number

Brand

Type

Model

Article Category

Article Category ...

Default Article Category for subcomponents ...

Name(s)

Name Operator Station PFAS Example

Additional Names

Identifier(s)

Part/Item No.

Part/Item No. 201803017011

Additional Identifiers

Dates

Query Lists

Product Business Info

Amounts and Weights

Measured weight per item 194.0 kg

Tolerance +/- 10.0%

Calculated weight per item 192.0 kg

Deviation -1.030927835%

Parts Marking

Required by law No

Polymeric part(s) marked ☐

Remark

Attachment

View

Filename Document Type Information Upload Date Filesize (kb)

Number of files: 0 / 5

Where used

Regulations

History Current Complete Overview

Scope: own company

Scope: Recipients

Confirmation

Demo: Examples of PFAS in common products

The screenshot displays the CDX Compliance Data Exchange (CDX CDE) software interface. The top header includes the CDX logo, "COMPLIANCE DATA EXCHANGE by DXC Technology", and the DXC TECHNOLOGY logo. The navigation bar contains tabs for MDS, Functions, Administration, and Help. Below this, a secondary navigation bar shows tabs for Component Search, Ingredients, Supplier data, Recipient data, Analysis, and MDS Request. The main interface is divided into two panes. The left pane, titled "Operator Console", shows a hierarchical tree of product components. The right pane, titled "Details", shows information for the selected component, "Operator Console".

Component Search

Filter: Common Regulations

PROD: PFAS Declarable Substance List

Operator Console

- 1x Instrument Panel
 - 1x Dashboard
 - 100.0kg Composite IP and Controls Overlay
 - 30.0kg ABS
 - 80.0 - 90.0% ABS
 - 5.0% GF-Fibre
 - 3.0 - 5.0% Plasticizer, not to declare
 - 5.0% Flame Retardant, not to declare
 - 1.0% Ethene, tetrafluoro-, homopolymer
 - 1x Trim
 - 20.0kg + AS060 (hot-dip aluminium-silicium coated)
 - 90.0% Aluminium (metal)
 - 8.0 - 11.0% Silicon
 - 0.5% Cyclotetrasiloxane, 2-(4,4,5,5,6,6,7,7,8,8,9,9,10,10,11,11,11-heptadeca
- 1x Operator Seat
 - 1x Seat Frame
 - 25.0kg HSLAS-F Grade 50 [340] (High-Strength Low-Alloy Steel with improved fo
 - 1x Seat Spring subassembly
 - 12.0kg Spring Steel Wire SL EN 10270
 - 1x Enhanced Foam Seat cover
 - 4.0kg Seat Upholstery - Enhanced
 - 50.0% Cotton-fibre
 - 35.0% PA6+PA66+PTFE
 - 14.7% PE-Fibre
 - 0.2% Chlorocresol
 - 0.1% Bronopol
 - 1x Recline Mechanism
 - 99.9g 100CrMo7-3 (Ball and roller bearing steel)
 - 0.1g Bearing Lubricant coating
 - 100.0% 1-Propene, 1,1,2,3,3,3-hexafluoro-, polymer with tetrafluoroethene
- 2x Side Mirror Improved
 - 750.0g Oleophobic Metal Frame
 - Rest 97.0% Aluminium (metal)
 - 3.0% Fluorosiloxane resin
 - 250.0g Water Repellent Glass
 - 10.0% Chromium-potassium-sulfate-dodecahydrate-
 - Rest 88.0% Silica, vitreous
 - 2.0% Fluoroalkylsilane ester, hydrolyzed.
- 1x 118-137 MHz Aircraft RF Communications Module

Details

Common Information

Type	Component
ID / Version	12484736 / 1.01
Node ID	12487777
Node Count	154
MDS Supplier	CL Demo 3
100% declaration	☐
SCIP Compliance	☐
External SCIP number	
Brand	
Type	
Model	

Article Category

Article Category

Default Article Category for subcomponents

Name(s)

Name *

Additional Names

Identifier(s)

Part/Item No. No file chosen

Part/Item No. *

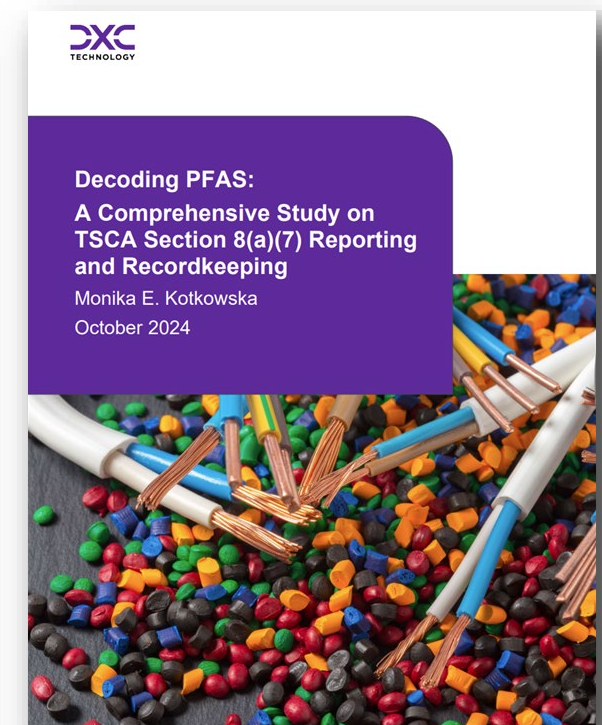
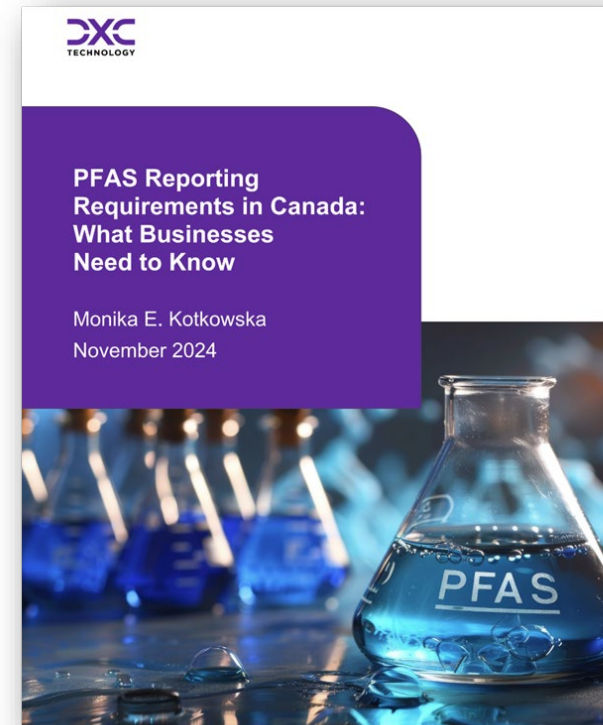
Additional Identifiers

Identifier Type	Identifier Value

Dates

Query Lists

Explore More Resources



[Supportive Material - CDX Web](#)

[Newsletter - CDX Web](#)

Agenda

- 1 Overview of PFAS and their significance
- 2 In-depth analysis of the PFAS regulatory landscape in the EU
- 3 PFAS regulatory developments in the UK
- 4 The current state of PFAS regulations in the US
- 5 Strategies for narrowing down PFAS data collection from 15k to 3k
- 6 Live demonstration of the CDX System
- 7 Interactive Q&A session with our expert panel





Questions and answers

