

PFAS Questionnaire

ESF / ETSA / EURATEX / FESI

INTRODUCTION

Your expertise is needed – help shape the future of PPE in Europe

The Universal PFAS restriction is approaching. Your feedback is crucial to keep protective products safe, accessible – and exempted where necessary.

This questionnaire gives you a chance to voice your concerns and ensure ECHA and the European Commission understands how PFAS are genuinely used – and what's at risk if they are overly restricted.

The UPFAS restriction proposal is among the most extensive in chemical policy history. If ECHA and the European Commission don't receive practical, real-world data from you – the people working with PPE – they might assume that PFAS are only used for water repellency, and that alternatives are readily available and straightforward.

This is your opportunity to prevent unrealistic rules, unworkable bans, and unintended consequences.

The European Safety Federation (ESF), the European Textiles Services Association (ETSA), the European Apparel and Textile Confederation (EURATEX) and the Federation of the European Sporting Goods Industry (FESI), are collecting inputs for the upcoming EU public consultation on the ECHA Socio-Economic Assessment Committee (SEAC) draft opinion. This report is a key step in the decision-making process for the proposed UPFAS restriction under REACH.

Questions in the current survey are based on questions we received from ECHA and authorities during the process of the UPFAS restriction proposal.

What is SEAC and why is it important?

SEAC is the Socio-Economic Assessment Committee of the European Chemicals Agency (ECHA). It assesses the economic, social, and technical impacts of proposed restrictions. While the Risk Assessment Committee (RAC) focuses on health and environmental risks, SEAC evaluates feasibility, costs, benefits, and societal consequences of a restriction. RAC and SEAC are the responsible Committees for ECHA's scientific opinions, which inform the European Commission's decision-making. Final legislative decisions are made by the European Commission.

Your responses will help SEAC understand how PFAS are genuinely used in PPE – and what risks might arise if they're abruptly banned. This can shape:

- Derogations (exemptions) for certain product categories
- Transition periods

The information received will be treated in a confidential manner and the compilation of answers will be anonymized and presented as a no exhaustive list of answers. ESF, EURATEX, ETSA and FESI will join the answers received to create a holistic representation for PPE and workwear.

- Technical feasibility considerations
- Economic impact statements

No data – no exemption. If you do not provide information, PFAS bans might be applied to all PPE.

This information will be later used in subsequent steps in the adoption process of the UPFAS restriction (e.g. Commission, CARACAL, ...).

Which products are covered in the questionnaire?

Considering that this industry sectors covers PPE and closely linked sectors the questionnaire has been set up to cover all these products:

- Technical textile / raw material / ingredient / component used in PPE or other covered products (as listed below)
- All types of PPE as in the scope of the PPE Regulation (EU)2016/425 (PPER)
- PPE excluded from the PPE Regulation (Art 2.2 e.g. use by the armed forces or in the maintenance of law and order; used for self-defence; use on seagoing vessels or aircraft that are subject to the relevant international treaties; for head, face or eye protection of users (UNECE Reg.22) on uniform provisions concerning the approval of protective helmets and their visors for drivers and passengers of motorcycles and mopeds.
- Medical textiles that are medical device as in the scope of the Medical Device Regulation (EU) 2017/745 (MDR)
- Professional outdoor safety equipment
- Cleanroom garments
- Technical textiles in other application than under the PPE Regulation or the Medical Device Regulation
- Workwear and uniforms that are not PPE

In the questionnaire, when the term “PPE” is used in the questionnaire, this means all products listed above, unless specified differently.

Why fill in the questionnaire?

By completing it, **even partial input is useful**, you help:

- Ensure that essential protective functions are not unintentionally banned
- Provide facts to counter simplistic or incorrect assumptions about PFAS use
- Represent your company and the PPE/ workwear sector in the EU policy process
- Support requests for realistic transition periods or specific exemptions

What if you don't respond?

- Products critical to safety or health may face **delays, recertification, or market withdrawal**.
- Sales and production ban /availability / enforcement (unfair competition from non-EU companies)

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- Your company's situation may **not be taken into account**.
- There is a risk of **inappropriate or overly broad restrictions** being implemented.

If you don't want to share data with the trade associations, you will need to respond directly to the ECHA consultation on the SEAC draft opinion.

Who should fill this in?

Whether you produce raw materials, apply finishes, assemble PPE/workwear, or maintain and clean "PPE", your input is valuable. No one else can tell your story. And without your story, policymakers will assume the sector can operate without PFAS – even where it cannot.

This questionnaire is intended for:

- **Manufacturers and importers of finished products and raw materials** used in "PPE"
 - **Service providers** involved in maintenance, care or refurbishment of "PPE"
- "PPE" is explained above.

Don't have all the answers? That's okay.

You don't need to complete this alone. If you're unsure about certain chemical inputs or PFAS content:

Reach out to your supplier or trusted testing laboratory.

They often have detailed technical documentation and experience with regulatory questions. Having lab test reports might help our sector to be far more convincing! If you wish to share **test reports or documents** with ECHA as **confidential annexes**, please indicate this clearly in your response.

Even **partial responses are very valuable**. Please complete what you can and simply indicate where information is unavailable or why you cannot provide information.

If you have **multiple product types** (e.g. footwear, hearing protectors, ...), you may complete the questionnaire separately for each type as the responses might be different for each type.

What happens with your data?

All responses will be treated **confidentially** as the survey is carried out by Survey Monkey, if you do provide your name and contact details these will be treated confidentially by the secretariat of the organisation (ESF, ETSA, EURATEX or FESI) as indicated in question 0.1.

No individual answers or company names will be shared.

The results will only be used to create an **aggregated and anonymized summary** to inform the sector's response to the upcoming consultation.

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If you wish to share **test reports or documents** with ECHA as **confidential annexes**, please indicate this clearly in your response.

If you don't want to share data with the trade associations, you will need to respond directly to the ECHA consultation on the SEAC draft opinion.

How long will it take?

If you have all information at hand, the questionnaire should take approximately **15-30 minutes** to complete, depending on the type of your organisation, your product types and the availability of data in your organisation.

Deadline

Please submit your completed questionnaire by **31 December 2025**.

This allows time to process and prepare sector input ahead of the consultation which is expected first half 2026 (see [ECHA announcement](#)).

Contact

If you have any questions, please contact the **ESF secretariat** via henk.vanhoutte@eu-esf.org / the **EURATEX secretariat** via chaima.elyahmadi@euratex.eu / the **ETSA secretariat** via n.ledevic@etsa-europe.org / the **FESI secretariat** via pero@fesi-sport.org.

Important context

During recent discussions, the use of PFAS in “PPE” has been wrongly simplified to repellency functions only. Finally, TULAC (Textiles, Upholstery, Leather, Apparel, Carpets), which covers materials that are linked to clothing or garments as the acronym implies, has been extended to other PPE that are not related to TULAC such as safety helmets, eye protection, face shields, ear plugs, ear defenders, air bags (e.g. protection from motorcycle falls or when in avalanches) and respiratory protective equipment. However, PFAS are used in **many other forms**, including **films**, coatings, lubricants, o-rings and components in PPE designed to protect against heat (including electric arc), flame, mechanical protection, chemicals, greases and solvents – including in helmets, face shields, respiratory equipment and more. This is a significant misunderstanding of what protective clothing and PPE are.

Moreover, the EU restriction proposal, in its [Background Document](#) (revised Annex XV by the five competent authorities based on the comments from the previous consultation) ([link](#)), sets quantitative thresholds to fall within its scope:

- A **limit of 25 ppb** for individual PFAS substances,

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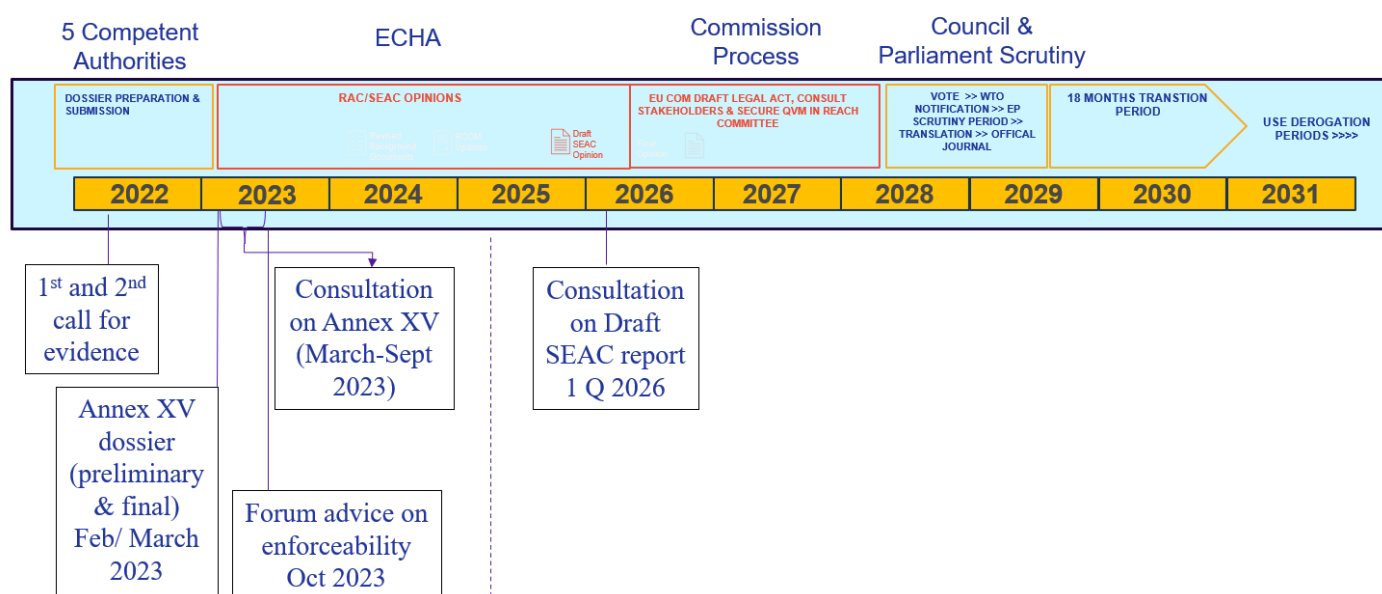
- **250 ppb** for the sum of related substances and degradation products,
- **50 ppm of total fluorine**, including polymers

When completing the questionnaire, please consider **the final PPE product**, its **application**, **all raw materials**, and any production step where PFAS may be used — even in components or parts. One of the comments made by RAC and SEAC are the lack of granularity for targeted derogation on emissions, cost and benefits do not allow drawing a conclusion on different derogation or differentiate derogation periods.

Timeline from restriction proposal to published restriction

The [Background document](#) of the 5 competent authorities (revised Annex XV proposal) became available on the 27th August 2025, the Risk Assessment Committee (RAC) and Socio-Economic Assessment Committee (SEAC) of ECHA will provide their (draft) opinions by early 2026. This may occur in one go or in steps therefore keep an eye on the documents as they are released if you are interested in the detail.

Probable Timeline Universal PFAS Restrictions



The RAC and SEAC process is still on-going with the topics of the next two meetings announced (September and December 2025) and a number of topics that have not yet been addressed (see below flow chart). As indicated above ECHA [announced](#) the timeline for the PFAS restriction evaluation. According to the [briefing note](#), ECHA has to deliver the final RAC and SEAC opinions to the European Commission in 2026. Therefore, RAC and SEAC plan to conclude their discussions on the 14 sectors covered by the original restriction proposal plus PFAS manufacturing and horizontal issues by the end of 2025, with the goal of carrying out the consultation on the SEAC draft opinion in the first half of 2026.

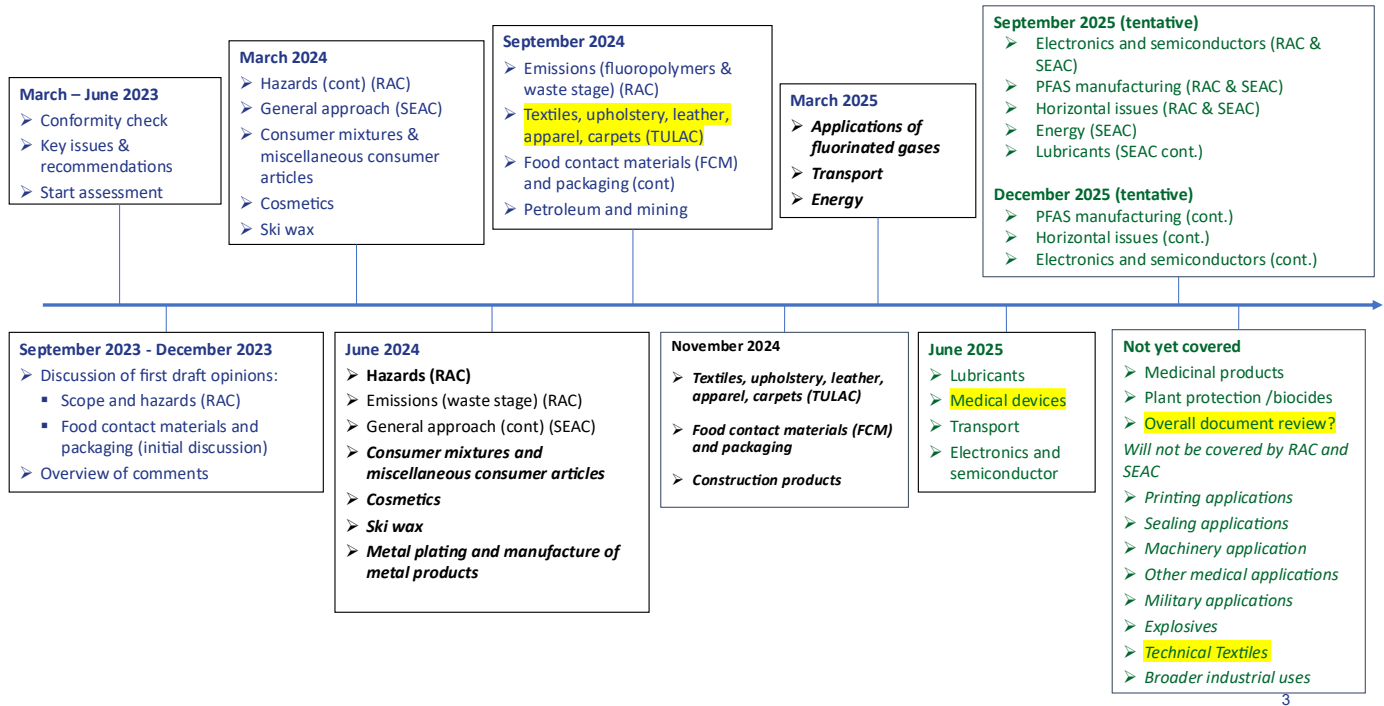
However, the Committees **will not carry out** a sector specific evaluation of the **8 new sectors** identified in the updated Background Document, as it “*would require significant time beyond 2026 to finalise the opinion with these sectors*”.

The 8 new sectors that have been identified are the following:

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

ECHA - RAC & SEAC opinion development on U-PFAS Restrictions



3

YOUR INPUT MATTERS

- Even if you only have partial information – your input matters.
- You are the expert. No one knows your product like you do.
- It only takes 15–30 minutes, but it can help shape the regulation for decades.
- Your answers stay confidential and will only be used in anonymised, aggregated form.
- Still unsure? We're here to support – contact us anytime.

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QUESTIONNAIRE

Please provide responses that are as complete as possible (if you don't know indicate "don't know", or why you can't answer, if confidential, please indicate so), tick the appropriate box(es) and provide additional information in free text form or add an attachment in the appropriate areas (frequently at the end of the section).

A list of acronyms is available at the end of the questionnaire.

SECTION 0: RESPONDENT INFORMATION

This section is critical to answer correctly, as the answers will direct to whom the answers will be sent at end (ESF, ETSA, EURATEX or FESI), in addition section 0.2 will direct you to the appropriate sections depending on your role in the supply chain.

Please provide the following information, only if we can contact you for further information.

Company Name (including department and/or country if relevant): [Click here to enter text.](#)

Contact person: [Click here to enter text.](#)

Email of contact person: [Click here to enter text.](#)

Function of contact person: [Click here to enter text.](#)

Please tick the appropriate box(es)

0.1 You are submitting this questionnaire through (tick only one box even if you are a member (or member of member) of more than one):

- ☐ ESF
- ☐ ETSA
- ☐ EURATEX
- ☐ FESI

0.2 Response to which organisation you belong (Please tick all applicable boxes):

- ☐ EU manufacturer
- ☐ Non-EU manufacturer
- ☐ importer based in the EU/EFTA

If you ticked either of those boxes for manufacturer or importer please respond to the set of 5 questions and click all applicable boxes below):

- ☐ Technical textile / raw material / ingredient / component used in PPE or other covered products (as listed below)
- ☐ PPE as in the scope of the PPE Regulation (EU) 2016/425
- ☐ PPE excluded from the PPE Regulation
(Art 2.2 e.g. use by the armed forces or in the maintenance of law and order; used for self-defence; use on seagoing vessels or aircraft that are subject to the relevant international treaties; for head, face or eye protection of users (UNECE Reg.22) on uniform provisions concerning the approval of protective helmets and their visors for drivers and passengers of motorcycles and mopeds.

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- ☐ Medical textiles that are medical device as in the scope of the Medical Device Regulation (EU) 2017/745 (MDR) (e.g. similar products)
- ☐ Professional outdoor safety equipment
- ☐ Cleanroom garments
- ☐ Technical textiles in other application than under the PPE Regulation or the Medical Device Regulation
- ☐ Workwear and uniforms that are not PPE

When in the questionnaire, “PPE” is referred to, it means any of the materials listed above

- ☐ Services provided to any of the above listed products):
 - ☐ cleaning / decontamination
 - ☐ repair
 - ☐ other; specify: [Click here to enter text.](#)
- ☐ Distributor of the above listed products
- ☐ Professional user of PPE (employer)
- ☐ Other (please specify, e.g. manufacturer / seller of re-impregnation agents) [Click here to enter text.](#)

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SECTION 1: PFAS IN PRODUCTION PROCESS (only for manufacturers / importers)

The intention of this section is to understand if PFAS is used intentionally or unintentionally added during the production of “PPE” (whether the “PPE” as a whole or only part of the production process), including how the PFAS comes in contact with the “PPE”. This section is split in three parts. 1A intentional, 1B Unintentional including cross-contamination, 1C Exposure and emissions. 1D reflects on potential alternatives and their limitations. There is also some open space to add personal comments that could not be captured in 1A or 1B. At the end of each section there is a possibility to add either text or an attachment if this is easier. This question should be answered once for all products (if additional explanations are necessary, please provide in the open space or in an attachment to this section).

Section 1A – PFAS in Production Process – Direct PFAS use (intentional)

Please tick the appropriate box(es) and provide additional information in the appropriate areas (if you don't know indicate “don't know”, or why you can't answer, if confidential, please indicate so).

1A.1 . PFAS substance is intentionally added during the process

No ☐

Yes ☐ (if yes, continue below)

1A.1.1. What is the substance, polymer or mixture (if possible, please add SDS info, CAS N°)? [Click here to enter text.](#)

1A.1.2. Do you know the quantities used, if yes, please provide an indication of the quantity if possible? [Click here to enter text.](#)

1A.1.3. What is the purpose of the substance/mixture? [Click here to enter text.](#)

1A.1.4. Does the PFAS substance remain in the product?

No ☐

Yes ☐

If yes, is it intentional in the product?

No ☐

Yes ☐ what is the purpose of the PFAS? [Click here to enter text.](#)

1A.1.5 If PFAS remain in your products (confirmed):

- What is the total PFAS content in your product? [Click here to enter text.](#)
- Is this based on a measurement
 - o Yes ☐
 - o Using which test method? [Click here to enter text.](#)
 - o Is it estimated? ☐
- Is the quantity in your product above the PFAS thresholds in the final product (>25 ppb, >250 ppb or >50 ppm)?
 - o Yes ☐
 - o No ☐

1A.1.6. Is the PFAS a component (see questions on PFAS in product)(intentionally added):

No ☐

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Yes ☐

If yes,

- what is the component (e.g. o-rings, electronics components)? [Click here to enter text.](#)
- what is the purpose of the component within the “PPE”? [Click here to enter text.](#)

1A.2 This is left open for providing additional information (or add an attachment) that was not well covered in the questionnaire:

[Click here to enter text.](#)

Section 1B – PFAS in Production Process – Un-intentional PFAS use

Consider that un-intentional PFAS could enter/or be detected in your products, for example through the use of water, or lubricants. In the case of water the levels would be insignificant but this may not be the case of other PFAS in the process or PFAS and non-PFAS products being produced on the same line. There is also some open space to add personal comments that could not be captured in 1A or 1B. At the end of each section there is a possibility to add either text or an attachment if this is easier. This question should be answered once for all products (if additional explanations are necessary, please provided in the open space or in an attachment to this section).

1B.1.1 Do you have PFAS in your process (e.g. processing aids, demoulding agents, sealants, lubricants, or similar applications) that could un-intentionally be added to the product during production?

No ☐ (if no, stop here))

Yes ☐ (if yes, continue below)

Don't know ☐ (if don't know, continue below)

If yes or don't know,

- what is the origin of this PFAS? [Click here to enter text.](#)
- have you done any analysis to find the possible sources of this PFAS and what was the result? [Click here to enter text.](#)

1B.1.2 Could you have PFAS coming through the recycled content?

No ☐

Yes ☐

Don't know ☐

What is the source of the PFAS in the recycled content? [Click here to enter text.](#)

What is the concentration of the recycled content? [Click here to enter text.](#)

Do you know the quantity of PFAS? [Click here to enter text.](#)

1B.2 This is left open for providing additional information (or add an attachment) that was not well covered in the questionnaire:

[Click here to enter text.](#)

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Section 1C – PFAS in Production Process – Exposure and Emissions

This section is applicable to both intentional and unintentional use of PFAS. There is also some open space to add personal comments that could not be captured in the questions below. At the end of each section there is a possibility to add either text or an attachment if this is easier. This question should be answered once for all products (if additional explanations are necessary, please provided in the open space or in an attachment to this section).

1C.1 What is the potential exposure of the worker to PFAS in the production process (quantification if possible):

1C.1.1 How many hours is the PFAS used per day? [Click here to enter text.](#)

1C.1.2 What is the toxicity of the PFAS? Describe or provide SDS. [Click here to enter text.](#)

1C.1.3 What is the potential exposure of PFAS? [Click here to enter text.](#)

How was this quantified? [Click here to enter text.](#)

Don't know [Click here to enter text.](#)

1C.1.4 Please indicate the route of occupational health exposure:

Oral ingestion/inhalation (quantify) [Click here to enter text.](#)

Skin contact (quantify) [Click here to enter text.](#)

Other (explain + quantify) [Click here to enter text.](#)

1C.2 What are your emissions from production (how is the amount measured or estimated):

1C.2.1 Air

Do you have air emissions?

No ☐

Yes ☐

If yes, what is the quantity of air emissions? [Click here to enter text.](#)

Are these point-emission or diffuse emission? [Click here to enter text.](#)

Is there treatment of the air streams? If yes what kind (e.g. filters, incineration) and efficiency of the treatment [Click here to enter text.](#)

Don't know ☐

1C.2.2 Wastewater

Do you have wastewater?

No ☐

Yes ☐

If yes, do you treat your wastewater?

Yes ☐ If yes, what is the remaining PFAS that is released? (how is the amount measured or estimated (specific substance or total PFAS), using what standards?) [Click here to enter text.](#)

No ☐

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If no, does your wastewater go to a shared wastewater treatment station (e.g. municipal, common with several companies, ...)?

No ☐

Yes ☐ If yes, does the wastewater treatment station understand the PFAS content? [Click here to enter text.](#)

Or is the wastewater released directly to the environment? How much is released? (how are the amount measured or estimated (specific substance or total PFAS), using what standards?) [Click here to enter text.](#)

Or is the wastewater treated as waste? yes ☐, please cover in part below

1C.2.3 Waste treatment (% landfill, incineration (effectiveness), recycling)

Do you have production waste containing PFAS?

No ☐

Yes ☐

If yes, is it treated as hazardous waste?

No ☐ If no, how is it treated ? landfill, incineration or recycling? [Click here to enter text.](#)

Yes ☐ If yes. how much is sent to landfill, incineration or recycling? [Click here to enter text.](#)

1C.3 This is left open for providing additional information (or add an attachment) that was not well covered in the questionnaire:

[Click here to enter text.](#)

Section 1D – PFAS in production Process – Alternatives to PFAS

There is also some open space to add personal comments that could not be captured in 1A or 1B. At the end of each section there is a possibility to add either text or an attachment if this is easier. This question should be answered once for all products (if additional explanations are necessary, please provided in the open space or in an attachment to this section).

1D.1 Are there alternatives to the PFAS in your production process?

No ☐

Yes ☐

If yes, indicate which/ and for what application? [Click here to enter text.](#)

1D.2 What is the timeline for implementing/using in your production process? [Click here to enter text.](#)

1D.3 Would there need to be additional qualification necessary at customers? [Click here to enter text.](#)

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1D.4 Would there need to be new certification of the “PPE” (if relevant)? [Click here to enter text.](#)

1D5. Explain why the alternative is not used (e.g. availability at industrial scale, cost, equipment incompatibilities, comfort, does not provide expected level of protection...)? [Click here to enter text.](#)

1D.6 If unknown, or answered “no” alternatives for the PFAS (question 1D.1). Are R&D activities on-going?

No ☐

Yes ☐

If yes, what is the expected timeline for finding substitutes and implementing them? [Click here to enter text.](#)

1D.7 This is left open for providing additional information (or add an attachment) that was not well covered in the questionnaire:

[Click here to enter text.](#)

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SECTION 2: “PPE” PRODUCT CONTAINING PFAS (MANUFACTURER / IMPORTER)

This section refers to the finished “PPE”, especially if PFAS are (intentionally or unintentionally) contained. If you have answered positive in Section 1, meaning that your products fall within the scope of the UPFAS Restriction proposal whether derogated or not, please answer the following questions:

2.1 Description of the product

2.1.1 Does your “PPE” contain a PFAS

No ☐

Yes ☐

If yes continue with this section 2, if no continue with the next relevant section

2.1.2 What type of “PPE” are you referring to, please describe our product (or add a picture), if multiple groups of products (please add an attachment here or at the end of this Section 2) : [Click here to enter text.](#)

2.1.2.1 What is the PFAS in your “PPE” (Please tick all applicable boxes):

- ☐ a substance or mixture
- ☐ a polymer
- ☐ a coating/finishing on textile
- ☐ a film (ETFE, PTFE, etc.)
- ☐ a non-textile part of the “PPE” or parts (RPD, visors, o-rings), please describe [Click here to enter text.](#)
- ☐ Other, please describe [Click here to enter text.](#)

2.1.2.2 Number of units of “PPE” placed on the market in EU [Click here to enter text.](#)

2.1.2.3 Number of accidents prevented per year (type of accidents)(if available) [Click here to enter text.](#)

2.1.2.4 Who is the potential end user? (Please tick all applicable boxes):

- ☐ Industrial users
- ☐ Professional user
- ☐ Public servants (municipal road/maintenance person)
- ☐ Fire fighter (volunteer ☐ or professional ☐)
- ☐ Other first responders (e.g. ambulance) (Dual use or not (PPE and/or Medical device))
- ☐ Hospital or other medical workers (Dual use or not (PPE and/or Medical device))
- ☐ Military and police (exempted from PPE regulation)
- ☐ Use on ships or aircrafts (exempted from PPE regulation)
- ☐ Consumer/private person outside of profession
- ☐ Other, please describe [Click here to enter text.](#)

2.2 Function/purpose of PFAS (e.g. protection of wearer, protection of patient, ...)

What is the function/purpose of the PFAS in your product (whether intentionally added or not): [Click here to enter text.](#)

2.2.1 Does it help meet a requirement in one or more standards?

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No ☐

Yes ☐

If yes, describe below

which standard(s), please list: [Click here to enter text.](#)

which requirement(s), please describe: [Click here to enter text.](#)

2.2.2 Does the PFAS provide a function/purpose other than from a protection perspective?

No ☐

Yes ☐

If yes, please tick all applicable boxes and quantify if possible:

- ☐ durability in use, describe the increase: [Click here to enter text.](#)
- ☐ reduced breakdown/repair, describe the reduction: [Click here to enter text.](#)
- ☐ improved ease of cleaning, describe the improvement/reduced cleaning/decontamination: [Click here to enter text.](#)
- ☐ other, describe the improvement: [Click here to enter text.](#)

2.3 Alternative to PFAS in the “PPE” or to “PPE” product containing PFAS

The purpose of this section is to understand whether there is an alternative that provides the equivalent or sufficient protection to the wearer.

This series of questions is looking to understand possible alternatives.

Therefore, we also try to understand what the impact may be of the change to the alternatives in broader societal impacts, such as increased accidents or occupational diseases, higher environmental impact (e.g. shorter product lifespan, more waste),

2.3.1 Are there alternative to PFAS in the “PPE” or to “PPE” product containing PFAS that provide sufficient protection

No ☐

If no, what is the risk in society (what **type of protection** (e.g. protection against heat, chemicals, flame, biological agents, oils/greases, etc) would be reduced or lost if your product were no longer available due to PFAS restrictions? [Click here to enter text.](#)

Yes ☐ (see 2.3.1.1)

2.3.1.1 If yes, do the alternative to the PFAS or to the product create or have any hazards, or have other negative attributes (What is the consequence for the user if the product fails or is downgraded due to lack of PFAS? e.g. higher injury or fatality risk, reduced operational safety, more frequent replacement, decreased comfort)?

No ☐

Yes ☐

If yes, explain in what way it may create or have any hazards or have other negative attributes?

[Click here to enter text.](#)

2.3.2 For an alternative product without PFAS, indicate if the protection is the same or may be different and why? [Click here to enter text.](#)

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- 2.3.3 What is the timeline for implementing/using this alternative? [Click here to enter text.](#)
- 2.3.4 Would there need to be additional qualification necessary at customers? [Click here to enter text.](#)
- 2.3.5 Would there need to be new certification of the “PPE” when using the alternative (if relevant)?
[Click here to enter text.](#)
- 2.3.6 Explain why the alternative is not used (e.g. availability at industrial scale, cost, equipment incompatibilities, comfort, does not provide expected level of protection...)? [Click here to enter text.](#)
- 2.4 This is left open for providing additional information (or add an attachment) that was not well covered in the questionnaire:
[Click here to enter text.](#)

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SECTION 3 – IMPACT OF PFAS RESTRICTION FOR PPE SECTOR – SOCIO-ECONOMIC ASSESSMENT (SEA)

This section covers the impact on manufacturers, importers, distributors and service providers to understand the impact the restriction. Questions may ask for an opinion for the impact on your product **with** and **without** a general “PPE” derogation.

3.1 Impacts related to supply

3.1.1 To what extent do you think the U-PFAS restriction has led/will lead to the following impacts related to supply? Please tick the appropriate boxes in the table below based on the products listed in 0.2.

	Strongly Disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	I do not know
There will be supply chain PFAS disruptions that will impact the production / servicing of the “PPE” in the EU						
We will stop producing/importing PFAS based “PPE” in the EU						
A derogation for “PPE” will mitigate the disruption						
We are looking into the possibility of outsourcing as a manufacturer or importer of PFAS/PFAS based material for “PPE” from third countries						
Would enforcement to be an issue without a derogation?						
At the end of the derogation period, do you expect to be an impact on maintenance and refurbishment if no extension is given for this.						

3.1.2 If you foresee or are experiencing difficulties of sourcing your PFAS, could you describe the impact triggered by this challenge?

☐ Interruption of the production/import

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- ☐ Delays in the manufacture of the “PPE”
- ☐ Increase in the price of the “PPE” or PFAS raw materials or components
- ☐ Increase of administrative duties or certification times
- ☐ Others, please specify [Click here to enter text.](#)

3.1.3 Did your company experience an increase in prices in the supply of PFAS to manufacture/import or service your “PPE” product/s (including either containing or treated components) needed to manufacture your “PPE” in the last 12 months?

No ☐

Yes ☐ if yes, by how much (in percentage)? [Click here to enter text.](#)

3.2 Impact to investment

3.2.1 To what extend do you think the U-PFAS restriction has led/will lead to the following impacts related to investments currently or in the coming years:

	Strongly Disagree	Somewhat disagree	Neutral	Somewhat agree	Strongly agree	I do not know
You are re-allocating funds assigned to innovation/or certification of new “PPE” to find PFAS alternatives						
You are redirecting your approach to innovation/or certification of new “PPE” due to legal uncertainty around PFAS						
There is a freeze of investments/or certification of new “PPE” because of the restriction process						
There is a reduction of investments/or certification of new “PPE” because of the restriction						
Do you approach the import of “PPE” differently because of the restriction process						
Would you consider your PFAS based “PPE” production outside of the EU						

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3.3 Do you experience more questions from customers regarding the potential content of PFAS in the “PPE”?

No ☐

Yes ☐

2.3.1 are you able to answer these customer questions?

No ☐

Yes ☐

if no, why not: [Click here to enter text.](#)

3.4 Have you asked more questions to suppliers regarding the potential content of PFAS in the “PPE”?

No ☐

Yes ☐

if no, why not: [Click here to enter text.](#)

3.5 This is left open for providing additional information (or add an attachment) that was not well covered in the questionnaire:

[Click here to enter text.](#)

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SECTION 4: “PPE” (CONTAINING PFAS) IN USE PHASE (question for end user (employer), or service providers, importers and manufacturers)

Please provide responses that are as complete as possible (if you don't know indicate “don't know”, or why you can't answer, if confidential, please indicate so), tick the appropriate box(es) and provide additional information in free text form or add an attachment in the appropriate areas (frequently at the end of the section).

A list of acronyms is available at the end of the questionnaire.

4.1 Maintenance

4.1.1 Does the PPE require routine maintenance?

No ☐

Yes ☐

4.1.2 Who carries out the maintenance (e.g. manufacturer, service provider, user)?

[Click here to enter text.](#)

4.1.2.1 How are they trained to do this maintenance? [Click here to enter text.](#)

4.1.2.2 What is the frequency of the maintenance? [Click here to enter text.](#)

4.1.3 Repellency / lubrication or other substance refurbishment?

No ☐

Yes ☐

If yes, could they be replaced by non-PFAS substitutes (without consequences to the certification)?

No ☐

Yes ☐ , if yes explain: [Click here to enter text.](#)

4.1.4 Part replacement

No ☐

Yes ☐

4.1.4.1 If yes, what kind of part? (check what is relevant)

☐ O-rings and seals, describe if contain PFAS (fluoroelastomers - FKM, FFKM, FEPM, FPM, etc.)
Please describe: [Click here to enter text.](#)

☐ Other parts Please describe: [Click here to enter text.](#)

4.1.4.2 How long would you need spare parts?

☐ Shorter than the transition period of the PFAS Restriction implementation?

☐ Shorter than the PFAS derogation?

☐ Longer than the PFAS derogation? Explain why: [Click here to enter text.](#)

4.1.5 Are there a non-PFAS maintenance solutions for the “PPE” end use?

No ☐

Yes ☐

4.1.5.1 If yes (e.g. different repellency (C0), non-identical spare parts or other refurbishment), please indicate the impact on potential issues like validity of the PPE, or need for a new certificate, etc.?

Explain: [Click here to enter text.](#)

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How is planned to deal with customers? Explain: [Click here to enter text.](#)

4.2 Laundry / cleaning and decontamination

4.2.1 Are any PFAS released during washing process?

No ☐

Yes ☐

4.2.2 Is repellency or other products/functions reapplied during the maintenance of "PPE"?

No ☐

Yes ☐

4.2.3 If yes to either the two above questions, do they contain PFAS?

No ☐ , has the process ever contained PFAS? If yes, is there a risk for cross contamination, please explain: [Click here to enter text.](#)

Yes ☐ , if yes please explain
- the type of PFAS (e.g. lubricants, repellency, other) [Click here to enter text.](#)

If yes to any of this sections 4.2, can you provide :

- provide estimate of PFAS quantities used (or solution containing PFAS (please provide SDS information if available): [Click here to enter text.](#)
- Either provide estimate of quantities of PFAS on the product after reapplication (refinish): [Click here to enter text.](#)
- Or provide estimate of pick-up of repellent finish in product: [Click here to enter text.](#)

4.3 Is there a potential for cross contamination during the use phase of non-PFAS products that are "PPE", whether this is at laundries, or in other processes? Make sure that respondents understand that they should indicate possible issues with PFAS and PFAS free products at the same time in the laundry - maybe additional question ?

No ☐

Yes ☐ if yes please explain (including level if cross-contamination) :
[Click here to enter text.](#)

4.4 Emission and waste

4.4.1 Indicate if there are any air emissions?

No ☐

Yes ☐ , if yes please explain quantities (if know (how determined: measured / estimated) or not): [Click here to enter text.](#)

4.4.2 Do you have wastewater?

No ☐

Yes ☐

4.4.2.1 If yes, do you treat your wastewater?

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Yes ☐ If yes, what is the remaining PFAS that is released? (how are the amount measured or estimated (specific substance or total PFAS), using what standards?)

[Click here to enter text.](#)

No ☐

If no, does your wastewater go to a shared wastewater treatment station (e.g. municipal, common with several companies, ...)?

No ☐

Yes ☐ If yes, does the wastewater treatment station understand the PFAS content?

[Click here to enter text.](#)

4.4.2.1.1 Or is the wastewater released directly to the environment? How much is released? (how are the amount measured or estimated (specific substance or total PFAS), using what standards?)

[Click here to enter text.](#)

4.4.2.1.1.1 Or is the wastewater treated as waste? yes ☐, please cover in part waste disposal under end of life section

4.4.3 Do you have waste?

No ☐

Yes ☐, please cover in part waste disposal under end of life section

4.5 Exposure

What is the potential exposure of the worker in the production process (quantification if possible):

4.5.1 How many hours is the PFAS used per day? [Click here to enter text.](#)

4.5.2 What is the toxicity of the PFAS? Describe or provide SDS. [Click here to enter text.](#)

4.5.3 What is the potential exposure of PFAS? [Click here to enter text.](#)

4.5.3.1 How was this quantified? [Click here to enter text.](#)

4.5.3.2 Don't know, please explain: [Click here to enter text.](#)

4.5.4 Please indicate the route of occupational health exposure:

4.5.4.1 Oral ingestion/inhalation (quantify) [Click here to enter text.](#)

4.5.4.2 Skin contact (quantify) [Click here to enter text.](#)

4.5.4.3 Other (explain + quantify) [Click here to enter text.](#)

4.6 This is left open for providing additional information (or add an attachment) that was not well covered in the questionnaire:

[Click here to enter text.](#)

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SECTION 5 PPE (containing PFAS) IN END OF LIFE PHASE (expectation from manufacturer or services provider, importers or users)

Before answering the questions below, please consider the following:

- End-of-Use (EoU): When a PPE product is no longer used by a specific user, but may still be functionally sound, reusable, or suitable for maintenance, repair, refurbishment, or reconditioning.
- End-of-Life (EoL): When the PPE product is permanently taken out of service and cannot be reused or refurbished in any way — it must be disposed of or recycled.

In practice, some products are discarded prematurely at EoU, even though technically not at EoL. This distinction is important when considering the environmental impact, product durability, and consequences of PFAS restrictions.

5.1 Reuse / Recycling and Recovery

5.1.1 How much is reused, recycled or recovered? Explain how and quantify or estimate:

[Click here to enter text.](#)

5.1.2 What impact do non-PFAS contaminations (e.g. smoke, asbestos, biological risks) have on the recyclability of this PPE product? Provide examples or indicate “no information available” if unknown.

[Click here to enter text.](#)

5.1.3 What is the impact of PFAS content on the potential for recycling this product or its components? Explain: [Click here to enter text.](#)

5.2 Waste disposal

5.2.1 Is this product treated as hazardous waste at End-of-Life?

No ☐

Yes ☐

5.2.1.1 If yes, specify the amount sent to landfill, incineration, or other treatment.

5.2.1.1.1 Landfill (quantify): [Click here to enter text.](#)

5.2.1.1.2 Incineration (quantify): [Click here to enter text.](#)

5.2.1.1.3 other treatment (explain and quantify): [Click here to enter text.](#)

5.2.1.2 If not classified as hazardous, how is it disposed of?

5.2.1.2.1 Landfill (quantify): [Click here to enter text.](#)

5.2.1.2.2 Incineration (quantify): [Click here to enter text.](#)

5.2.1.2.3 other treatment (explain and quantify): [Click here to enter text.](#)

5.3 Life Expectancy & Regulatory Impact

5.3.1 If a derogation is granted, but the derogation does not extend period for spare parts, and other refurbishment such as repellency and lubricants?

5.3.1.1 Consider limitations on refurbishment, reconditioning, or spare part availability. (click what is appropriate)

☐ do you expect a shortened useful life of PPE products once the PFAS restriction enters into force

☐ do you expect no change, business as usual

5.3.2 Are products currently being discarded at End-of-Use even though they are technically reusable?

No ☐

Yes ☐

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If yes, why (e.g. lack of cleaning infrastructure, perception of contamination, missing spare parts)?

Please explain: [Click here to enter text.](#)

5.3.3 Would PFAS restrictions force earlier End-of-Life for otherwise reusable PPE?

No ☐

Yes ☐

If yes, explain why (e.g., missing spare parts)?

Please explain: [Click here to enter text.](#)

5.4 This is left open for providing additional information (or add an attachment) that was not well covered in the questionnaire:

[Click here to enter text.](#)

CONGRATULATIONS, YOU MADE IT TO THE END 😊

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Used abbreviations

Acronym	Explanation
BD	Background Document from 5 competent authorities (Revised Annex XV)
CARACAL	Commission Expert Group of Competent Authorities for the REACH and CLP Regulations
CAS N°	Chemical Abstracts Service number – unique numeric identifier assigned to every chemical substance
ECHA	European Chemical Agency
ESF	European Safety Federation
EFTA	European Free Trade Association (EFTA) is a regional trade organization consisting of four member states: Iceland, Liechtenstein, Norway, and Switzerland
EoL	End-of-Life
EoU	End-of-Use
ETFE	Ethylene tetrafluoroethylene
ETSA	European Textile Services Association
EU	European Union
EURATEX	European apparel and textile industry federation
FEPM	Tetrafluoroethylene propylene
FESI	Federation of the European Sporting Goods Industry
FFKM	Perfluorelastomer
FKM	Fluoroelastomer (Fluorine Kautschuk Material)
FPM	Fluoroelastomer
MD	Medical Devices
MDR	Medical Device Regulation
PFAS	Per- and Polyfluoroalkyl Substance
PPE	Personal Protective Equipment
PPER	PPE Regulation
PTFE	polytetrafluoroethylene
RAC	Risk Assessment Committee
RPD	Respiratory protective device

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SDS	Safety Data Sheet
SEA	Socio Economic Assessment
SEAC	Socio-Economic Assessment Committee
TULAC	Textiles, Upholstery, Leather, Apparel and Carpets (includes also all types of PPE, including those that are not made of textiles)
UPFAS	Universal PFAS
UNECE	United Nations Economic Commission for Europe

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