

HOW PFAS POLLUTERS MUDDY EU POLICY WATERS AND WHAT WE SHOULD DO ABOUT IT

Corporate Europe Observatory

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HOW PFAS POLLUTERS MUDDY EU POLICY WATERS — AND WHAT WE SHOULD DO ABOUT IT

Executive summary

This week the European Chemicals Agency will finalise its opinion on the proposed EU-wide PFAS ban. The European Commission will then need to make up its mind on how to respond. This will be a crucial step in the fight against one of the worst chapters in the history of chemical pollution. The 'forever pollution' crisis caused by the manufacture, use, and disposal of PFAS is getting worse. It is clear that citizens across Europe (and beyond) are contaminated with these chemicals, some at far higher levels than is considered safe. This puts their health at serious risk. Not only that, but the bill for environmental clean-up is already unaffordable, and will only increase if we don't take urgent action.

Yet the EU's proposed ban on all but the most vital uses of PFAS is under threat. In January 2025 **research** showed how the PFAS industry dominated the lobby discourse at EU level. At the same time **media investigations** showed how the fluoropolymer lobby was using arguments many of which were found to be "misleading, fearmongering, exaggerated, or potentially dishonest" to try to exempt these chemicals from the ban.

Today these lobbyists remain active and vocal. A new wave of PFAS industry lobbying is happening in the context of the second von der Leyen Commission, which has shown itself to be extremely friendly towards the chemicals sector and its interests.

The fluoropolymer lobby — which includes AGC Chemicals (UK/JP), Arkema (FR), Chemours (US), Daikin (JP), Solstice (US), Syensqo (BE), and their trade association Plastics Europe — **demands** a full exemption for its products from the proposed PFAS regulation. Just these 7 groups alone have already secured at least 37 lobby meetings during the second von der Leyen Commission where the topic of PFAS was discussed. That is the equivalent of at least 1 meeting every third week, almost entirely with the most senior officials. Total lobbying on the topic of PFAS from across industry would be far, far higher.

The fluoropolymer industry is relying upon arguments about emissions reduction, safe disposal, lack of alternatives, and the "criticality" of its chemicals, even though these claims are disputed and discredited, including by independent scientists. Some of the same voices also demand a full exemption for F-gases which is also highly problematic.

But the risk is that lobbyists are successfully muddying the PFAS policy waters and sowing enough doubt in the minds of regulators that they opt for a weaker regulation than the strong action that the forever pollution crisis requires.

It is time for the Commission and other decision-makers to end their complacency towards the PFAS industry lobby.

It is time for a new approach which prioritises the public interest, accountability, transparency, and far more scrutiny of industry claims.

It is time for a **strong, universal restriction on PFAS** and for toxic-free politics.



HOW PFAS POLLUTERS MUDDY EU POLICY WATERS AND WHAT WE SHOULD DO ABOUT IT



1. INTRODUCTION

1.1 What are ‘forever chemicals’ PFAS?

Per- and polyfluoroalkyl substances (PFAS, also known as ‘forever chemicals’) are a group of more than **10,000** human-made chemicals whose defining property (‘persistence’) derives from their strong carbon-fluorine bonds. PFAS have waterproof, greaseproof, and heatproof properties, and as a result are widely used in industry, as well as in professional and consumer products — from machinery to raincoats. But, as detailed in section 1.2, their negative impact on human health and the environment is huge.

Fluoropolymers are a sub-group of PFAS, essentially ‘plastic PFAS’. They include PTFE (polytetrafluoroethylene, commercially known as Teflon, but also by other names) and PVDF (polyvinylidene fluoride or polyvinylidene difluoride). They are found in solar panels, medical devices, defence applications, as well as other uses. Fluorinated gases (F-gases) are another, separate group of substances, some of which fall within the broad PFAS definition. Some fluoropolymer producers also manufacture F-gases. They are used in refrigeration, air conditioning, heat pumps, and other applications. As well as contributing to PFAS pollution, many F-gases also have severe impacts on global heating.

The former head of the US Environmental Protection Agency, Michael Regan, **called** PFAS pollution “one of the most pressing public and environmental health problems of the modern world”. Regulators worldwide are slowly waking up to the fact that tackling PFAS pollution is increasingly urgent.

1.2 The forever pollution crisis keeps getting bigger

"PFAS pose a profound threat to human rights and the environment that compels an immediate ban of all non-essential uses of PFAS and urgent action at every level to effectively control PFAS and prevent PFAS pollution."

That is the **verdict** of the UN Special Rapporteur on human rights and toxics, **Dr Marcos A. Orellana**, in a report written just before his term ended in September 2026.

The PFAS pollution crisis is getting bigger; as the nickname implies, once created, these 'forever chemicals' are with us for the very long-term. In 2023 the Forever Pollution Project **identified** nearly 23,000 sites across Europe which were contaminated by PFAS, with a further 21,500 presumptive contamination sites (due to current or past industrial activity). One of the many consequences of the persistence of PFAS is that when some forever chemicals break down, they can form further persistent PFAS. These include short-chained PFAS such as **TFA (trifluoroacetic acid)**.

Evidence is mounting that our own bodies are also PFAS contamination sites. For example, blood tests have recently **shown** that citizen volunteers from different parts of Europe all had PFAS in their blood. Not only that, but 25 per cent had levels that exceed a health-based threshold derived from the European Food Safety Authority's tolerable intake level. When 23 environment ministers and the EU Environment Commissioner were **tested** in Summer 2025, each person was found to be contaminated with PFAS, with 50 per cent exceeding levels beyond which health impacts cannot be ruled out. Other studies, such as from the **European Human Biomonitoring Initiative**, or from **the Netherlands,** or the **UK,** also reflect alarming findings. In short, it is likely that everyone reading this report has blood contaminated by PFAS. Workers in certain sectors, including chemical manufacturing and firefighting (among other industries), are on the frontline of PFAS pollution, with their **blood tests** "frequently [showing] higher concentrations of PFAS than surrounding communities".

IT IS LIKELY THAT EVERYONE READING THIS REPORT HAS BLOOD CONTAMINATED BY PFAS

What do these blood test results mean? PFAS contamination is associated with elevated risk for numerous health conditions. These endocrine-disrupting chemicals are **associated** with impacts on foetal growth and development, immunotoxicity, increased risk of kidney and testicular cancers, thyroid and liver damage, higher cholesterol levels, plus reproductive and fertility-related effects. Health impacts have been linked to a wide range of PFAS, from long-chained PFAS (eg. PFOA and PFOS which are now banned in the EU), to short-chained PFAS (eg. TFA, which ECHA recently **recommended** classifying as toxic to reproduction). **GenX** is another PFAS with **problematic health impacts** (according to animal studies) which was used as a substitute when previous forever chemicals such as PFOA were banned.

In the light of this evidence it is not surprising that health care professionals are **supportive** of urgent action to tackle PFAS.

BOX A: INTERVIEW WITH A RESIDENT LIVING NEAR A FLUOROPOLYMER PRODUCTION SITE

"I'm from Dordrecht in the Netherlands. I'm 50 years old, married, and I have a son who is 15 years old. I live approximately 1.5 kilometres from the plant of Chemours here in Dordrecht.

I learned about Chemours and PFAS for the first time in 2016 after journalists drew a parallel between a chemical plant in the US, where there was a scandal around PFAS, and Dordrecht, because the plant here is an exact copy. So, there were protests and I took part. Ever since, I've been kind of worried. But in the beginning, the stories were mostly that it was dangerous for the people working in the plant itself or living less than one kilometre around the plant. So, I was worried mostly for these people.

In 2023, our province of South Holland, which is responsible for the permitting process that Chemours needs for its operations, tried to make the permit for emissions of PFAS a lot stricter. But Chemours went to court to prevent this, and unfortunately the judge agreed with the company. I had already started studying law by then, but this made me start to dive into this topic from a judicial point of view. Soon after, the TV programme **Zembla** confirmed the suspicions around Chemours with regard to how much they already knew about PFAS and how harmful these chemicals are. The documentary basically showed that the management at the plant in Dordrecht already knew, for decades. It also showed that the waters and the soil are polluted as far as 15 kilometres away from the plant. [Chemours' response to the documentary is available **here.**]

I was so angry and so sad, also for my personal situation. Because I live 1.5 kilometres from the plant, I swim in a river very close by, I have a vegetable garden, and I breastfed my child when the plant was still using PFOA [which has since been banned] at the site. And it's not just going into the water, but it's also going into the air, actually mostly into the air.

So we initiated a **criminal complaint** and filed it with the General Prosecutor in Autumn 2023, on behalf of around 4,000 people. The criminal investigation against Chemours started in October 2023 and is still ongoing. [Last year, the police carried out a raid on the company as part of this investigation. A new **legal summons** was launched by residents in early November 2026.]

From the company we hear the same line over and over, broadly: 'we understand that there is concern and we are sorry about that, but we've always abided by the law. We've done so much to reduce the emissions and we stayed within the law and we want to take away the concerns. So we will organise discussions.'

They sound very reasonable when they say that. And also it is true that they have reduced the GenX emissions [GenX replaced the banned PFOA, but is another PFAS substance with **associated risks**], but they're not down to zero, if you look at the amount of kilos that they're still allowed to emit and throw in the river. Even if it is legal, it is still not right. And we think Chemours is also emitting other types of PFAS, among which are TFA and F-gases, both known to be harmful and bad for the environment. But instead they portray themselves as leaders in sustainability.

I think we need to continue to bring into the open this strategy being used by the industry, because I don't think they should get away with it. People need to know that this is not just an environmental issue, it's a health issue, it's an issue of decency, moral decency. And there are a lot of stressed people that are worried about what they should, could, or can do.

There's this group of mothers who, like me, breastfed their kids. And if you breastfeed, **you give the PFAS** to your baby through the milk. I didn't know that at the time, but there are lots of these mothers that even though they were in the same position as I was, they felt guilty and they can't stop feeling guilty. And that's really sad because they shouldn't bear the guilt, yet they feel guilty and stressed.

There is no easy solution to this problem, but it does start with a very clear policy of the European Commission, of the EU, just to stop production and sales of products with PFAS, as well as any other process that leads to additional PFAS pollution. Even when this happens, we're not there yet. It's just a start, but we need to start there – we need to stop pollution at the source. Because it's about the future, not just ours, but especially for future generations, in Dordrecht as well as everywhere else in this world."

For more information on Chemours, see Box F.



2. TACKLING THE FOREVER POLLUTION CRISIS

2.1 60 legal cases, and counting

In response to the growing forever pollution problem, numerous legal actions are commencing against the producers and industrial users of PFAS, and against regulators where there has been inaction. Afterall the impacts of PFAS have long been known. In total, close to 60 cases have been launched across Europe, primarily by affected local communities.

In October 2026, the not-for-profit organisations ClientEarth, Notre Affaire à Tous, and Générations Futures **formally** put the French cookware-maker SEB "on notice" for failing to adequately identify, assess, and mitigate the environmental and health risks linked to its continued use of PFAS, particularly Teflon used in cookware. In July 2026 ClientEarth **filed** a human rights complaint to the European Committee of Social Rights over Belgium's failure to protect public health from widespread PFAS pollution. In July 2025 a criminal trial found 11 former Miteni executives at a PFAS production site in Italy guilty of polluting the water and soil around the plant.

IN JULY 2025 A CRIMINAL TRIAL FOUND 11 FORMER MITENI EXECUTIVES AT A PFAS PRODUCTION SITE IN ITALY GUILTY OF POLLUTING THE WATER AND SOIL AROUND THE PLANT

The defendants were **sentenced** to 141 years in jail collectively.

Legal action is vital, to try to hold PFAS polluters and regulators to account, and to implement the EU treaty-enshrined **"polluter pays principle"**, at least for the clean-up costs in their locality. But this is not enough: the remediation of water, air, and soils is "not a sufficient, affordable or plausible solution", according to a **recent study.** The Forever Lobbying Project **calculated** that, if emissions remain unrestricted, cleaning up PFAS contamination in Europe would cost €2 trillion over a 20-year period, or €100 billion annually in perpetuity. The Commission has **estimated** that, if current levels of pollution continue until 2050, the cost to society would reach €440 billion, with the treatment of polluted water alone costing more than €1 trillion.

Often perceived as a curative remedy, legal action mostly takes place after PFAS contamination has occurred. This is too little too late. Considering that scientists **say** that "additional environmental and human health concerns will be identified as research continues into this class of chemicals", it is increasingly urgent to stop this forever pollution crisis from getting any worse.



2.2 What are EU regulators planning for PFAS?

Several EU member states are taking regulatory action at the national level on PFAS, including **Denmark, France, Sweden,** and the **Netherlands.**

But it is at the EU level where the biggest regulatory effort is underway. In 2023 five countries (Denmark, Germany, the Netherlands, Norway, and Sweden — the so-called 'dossier submitters') made a **proposal** to introduce an EU-wide universal PFAS (henceforth referred to as uPFAS) restriction to ban the manufacture, sale, and use of PFAS. Importantly the proposal groups *all* PFAS substances together, in an effort to speed up regulation and ensure that substances that are banned are not replaced with a similar but unbanned substance (regrettable substitution).

The uPFAS restriction is being introduced under the **REACH chemicals regulation** and has been assessed by the scientific committees of the European Chemicals Agency (ECHA). ECHA is expected to finalise its opinion in the coming days, and then to pass this to the Commission, at the latest by the end of 2026. The Commission, in particular its industry and environment departments, DGs GROW and ENV, steered by **Executive Vice-President Stéphane Séjourné** and **Commissioner Jessika Roswall** respectively, would then have 3 months to draft its own proposal, upon which the 27 member states via the **REACH committee** will make a final decision. After adoption, there will be an 18 month transitional period for all PFAS uses to be phased out. Where adequate PFAS-free alternatives do not yet exist for vital uses, these will be granted additional 'derogations', expected to range from between 5 and 12 additional years. Some PFAS uses, such as those in biocides, pesticides, pharmaceuticals, and veterinary products, have already been fully exempted from consideration and will, **unfortunately**, remain unaffected. For more details on the proposed restriction see the European Environmental Bureau's **new briefing.**



3. THE FLUOROPOLYMER LOBBY FIGHTS BACK AGAINST REGULATION

3.1 von der Leyen's second Commission proves highly industry-friendly

ChemSec, a Swedish NGO, **reports** that there is a worrying "global trend towards expanding PFAS production", driven by AI and data-centre infrastructure (see Box E), semiconductor manufacturing, and lithium-ion battery materials. As just one recent **example,** a Swiss private equity firm has taken over a German fluoropolymer plant that had been slated for closure, and has **promised** to "ramp up manufacturing operations". Meanwhile local residents are dealing with the consequences of living in a wide PFAS **contamination zone.**

PFAS producers have also been lobbying hard to delay, weaken, and derail the uPFAS restriction. The extent of the industry lobby fight-back against the proposal, especially in 2023-24 after the original uPFAS proposal was first published and consulted upon by ECHA, was detailed in Corporate Europe Observatory's January 2025 **Chemical reaction** report. These lobbyists remain active and vocal.

A new wave of lobbying is happening in the context of the second von der Leyen Commission, which has shown itself to be extremely friendly with the chemicals industry and its interests. Since taking office in December 2024, this Commission has: reversed previous ambitions to **revise REACH** which would have helped get harmful chemicals off the market; worked to weaken the rules governing carcinogens in cosmetics, hazard labelling of chemicals for consumers, and **pesticide authorisations,** as part of its **deregulation drive;** and put the chemicals industry in the driving seat of its **Critical Chemicals Alliance** (see section 4.4). Chemicals industry lobbying has helped develop and reinforce the Commission's agenda in all these cases.

A NEW WAVE OF LOBBYING IS HAPPENING IN THE CONTEXT OF THE SECOND VON DER LEYEN COMMISSION, WHICH HAS SHOWN ITSELF TO BE EXTREMELY FRIENDLY WITH THE CHEMICALS INDUSTRY AND ITS INTERESTS

BOX B: DECADES OF EVADING AND FIGHTING REGULATION

From the late 1990s onwards, leading PFAS producers were forced (by US courts) to disclose toxicity information about their products. They had previously hidden evidence for decades to evade and fight regulation. **Academic analysis** of previously secret documents from DuPont and 3M by Nadia Gaber et al in "The Devil they Knew" showed that, by 1970, these companies knew that the PFAS they were producing were "highly toxic when inhaled and moderately toxic when ingested." This was forty years before the public health community knew about the harms. The documents also show that these manufacturers used "several strategies that have been shown common to tobacco, pharmaceutical and other industries to influence science and regulation — most notably, suppressing unfavorable research and distorting public discourse." As a result, regulatory action was significantly delayed.

3.2 Fluoropolymer industry lobbies hard once again

This report largely examines the lobbying of the fluoropolymer industry. In January 2025 the **Forever Lobbying Project** criticised the industry, calling many of its lobby arguments "misleading, fearmongering, exaggerated, or potentially dishonest". This was based on a **stress-test** which examined the evidence behind the industry's most common claims. Plastics Europe's responses to the Project's findings are available **here** and **here.**

Our new analysis shows that the fluoropolymer lobby (defined as the trade association **Plastics Europe** and its sectoral group the Fluoropolymers Product Group, plus its members, in particular **AGC Chemicals Europe, Arkema, Chemours, Daikin Chemical Europe, Syensqo,** and **Solstice Advanced Materials** (formerly **Honeywell Europe**) continue to be active and vocal lobbyists. Just these groups alone have already secured at least 37 lobby meetings during the second von der Leyen Commission (12 December 2024 — 24 September 2026) on the topic of PFAS. That is the equivalent of at least 1 meeting every third week, almost entirely with the most senior officials. The list of these lobby meetings is available **here.**

Moreover, this is likely to be an underestimate. This is because we do not have a complete list of all lobby meetings for this period (including the non-high-level meetings), and because the Commission's meeting minutes are sometimes vague, meaning that they do not reflect the topics discussed in detail. Of course the total number of meetings these lobbyists have held on all issues, including other chemicals topics, is far higher.

Between them, these fluoropolymer industry lobby groups declare spending €10-11 million a year on EU lobbying on all topics; it is not possible to differentiate their PFAS-related lobby spending from spending on other topics.

It is important to note that the total number of meetings and wider influencing activities on the uPFAS restriction by trade associations and companies wishing to weaken it in some form would be substantially higher. Various EU and national level lobby organisations eg. **Orgalim** (Europe's Technology Industries) and **EPEE** (the European Partnership for Energy and the Environment, see Box E) are active on PFAS, as well as many other downstream users and their trade associations. **CEFIC** (the European Chemical Industry Council), among other activities, runs a sector group called

FluoroProducts and PFAS for Europe (**FPP4EU**). Its members are "producers, importers, and users of fluorinated products and PFAS", including almost all members of the Fluoropolymers Product Group. FPP4EU's activities include "interests presentation". It **calls** for a "move from a blanket ban with derogations to a 'continued use unless restricted' approach." **BASF** and **Bayer** are both in the **top 10** of PFAS producers. BASF has **committed** to phase out "chemical products that are formulated with PFAS" which is welcome, although PFAS in its pesticides are not included. According to **ChemSec**, Bayer does not appear to have a PFAS substitution plan in place. Both companies continue to produce crop protection products with PFAS substances and have lobbied accordingly.

TABLE 1: FLUOROPOLYMER INDUSTRY LOBBYING AND EXPENDITURE AT EU LEVEL

Fluoropolymer industry lobbyist	Lobby meetings on PFAS* under von der Leyen 2 Commission	Most recent annual declared EU lobby spend (on all topics) in €
Arkema	8	200,000 - 299,999
Chemours	8**	800,000 - 899,999
Honeywell Europe / Solstice Advanced Materials	7**	2,000,000 - 2,249,999***
Plastics Europe / Fluoropolymers Product Group	6	4,000,000 - 4,499,999
Syensqo	5	900,000 - 999,999
AGC Chemicals Europe	2	900,000 - 999,999
Daikin Chemical Europe	2	900,000 - 999,999
Total	**37**	**9.7 million – 10.95 million**

* Using search terms: 'PFAS', 'fluoropolymer', 'F-gas', specific names of PFAS such as PTFE

** 2 companies attended 1 meeting together so this is only counted once in total

*** Solstice does not currently declare a lobby budget, but Honeywell declared this sum prior to the separation from Solstice

See annex 2 for more detail on our methodology. We have approached each of these lobby groups listed in the table for a response to our findings. See annex 1 for the responses from the Fluoropolymers Product Group, Syensqo, and Arkema.



BOX C: LOBBYIST PROFILE: PLASTICS EUROPE / FLUOROPOLYMERS PRODUCT GROUP

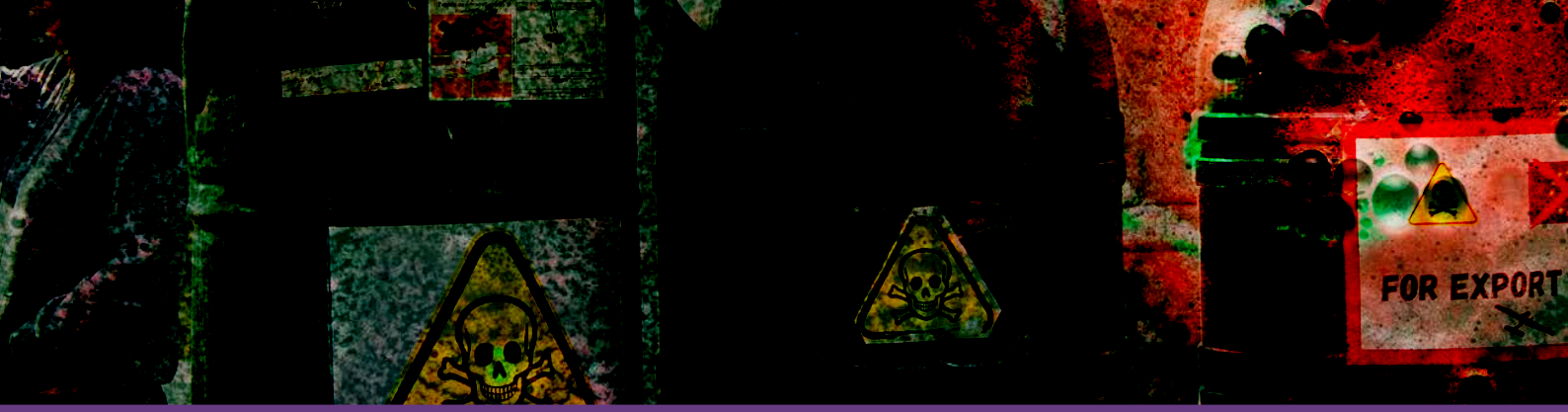
Plastics Europe, the trade association for plastics manufacturers, is one of the most active – and controversial – lobby groups pushing to weaken the uPFAS restriction. Together with its sectoral sub-group, the **Fluoropolymers Product Group**, it has been demanding a **full exemption** for fluoropolymers in the uPFAS restriction. This would mean continued production, with a reliance on emissions control, exemplified by its **emissions management programme** across members' production sites. The Fluoropolymers Product Group's **membership** has varied over time but is currently: AGC Chemicals, Arkema, Chemours, Daikin Chemicals, Gujarat Fluorochemicals, Kureha, Syensqo, Solstice Advanced Materials, and Qnity, some of whom are profiled below[1].

Plastics Europe is one of the highest spenders in the EU lobby register, declaring over €4 million a year (Fluoropolymers Product Group lobbying is included within Plastics Europe's **entry**). It held at least six lobby meetings on the topic of PFAS with the second von der Leyen Commission (since December 2024). Additionally, Plastics Europe secured the attendance of senior Commission officials at its recent board meetings (**December 2025** and **June 2026**). It has been a member of the Steering Board of the **Critical Chemicals Alliance**. The Alliance has reinforced industry arguments that the fluoropolymer PTFE (eg. Teflon) is "critical" for the EU economy and (presumably therefore) that it should be exempted from the uPFAS restriction. Hydrofluoric acid, a precursor of PFAS, is also on the Critical Chemicals Alliance's list of "critical molecules". See section 4.4 for more detail.

The Fluoropolymers Product Group has been actively mobilising its members' downstream users / value chains, using a 2025-26 **series of webinars** "to bring together stakeholders across the fluoropolymer value chain and support a coordinated, science-based approach to their safe and strategic use." These webinars have covered **medical and pharmaceutical sectors, digital economy**, and other topics. Presenting **itself** as "the voice of the industry across Europe", it says it "actively contribute[s] to the debate, advocating for a balanced regulatory environment based on scientific facts to ensure that European industries remain competitive and sustainable."

See annex 1 for the response from the Fluoropolymers Product Group to our findings.

1 Kureha and Qnity are not registered in the EU lobby transparency register. Gujarat Fluorochemicals is **registered** and says it "is advocating for exemption of Fluoropolymers from the EU PFAS restriction proposal", but has had no declared high-level Commission lobby meetings. None of these companies feature further in this report.



4. MUDDYING THE WATERS

The fluoropolymer lobby **demands** that its products are fully exempted from the uPFAS restriction, aiming for a business as usual approach to production and sales. The lobby appears to have dropped some of

Its previous arguments to support that demand,[1] possibly in response to the Forever Lobbying Project's **critique**. But instead other arguments have been emphasised, developed, or refined. Industry regularly calls its demand for a fluoropolymer exemption a "**balanced**" approach to the uPFAS restriction, as if this lobby demand was entirely reasonable. But this is a 'smoke and mirrors' approach to lobbying and independent scientists, regulators, and others dispute industry's narrative. Below we examine several of these discredited industry arguments that have been deployed to muddy the waters:

4.1 'Fluoropolymer manufacturing emissions can be sufficiently reduced'

4.2 'Fluoropolymers can be adequately destroyed at their end-of-life'

4.3 'There aren't enough effective alternatives for fluoropolymers'

4.4 'Fluoropolymers are "critical" chemicals'

4.1 Industry argument: *'Fluoropolymer manufacturing emissions can be sufficiently reduced'*

What industry says: One of the most common industry **arguments** is that the production of PFAS emissions during the manufacturing process can be reduced and controlled sufficiently, and therefore fluoropolymers can be exempted from the uPFAS restriction. This approach enables industry to argue that its modern techniques have evolved to reduce emissions so much that there is next to no risk. Giving practical backing to this claim is the Fluoropolymers Product Group's voluntary emissions reduction programme, which it **says** has already met its 2024 targets, and is "on track" to meet the 2030 ones.

How industry lobbies: The importance of this argument was illustrated when ECHA issued a **statement** in November 2024 saying it would also **consider** "alternative restriction options, besides a [...] ban with time-limited derogations". This was **clarified** as follows: "Information has been submitted in the consultation that may form a basis for alternative restriction options for e.g. fluoropolymers in manufacturing, service life and end-of-life, while still adhering to the purpose of the proposal to minimise emissions to the environment." In response, PFAS producer and lobbyist Chemours **reported** that it was "encouraged by this positive update".

Under the von der Leyen 2 Commission (which started in December 2024) emissions reduction has been a repeated theme in lobby meetings, with the Fluoropolymers Product Group and many of its members trooping in to meet the Commission and present their emission reduction initiatives:

- **3.7.2025** meeting with Séjourné's Cabinet:

1 An example of a dropped industry lobby argument appears to be that fluoropolymers are "Polymers of Low Concern" according to Organisation for Economic Co-operation and Development criteria which have been shown not to exist.

"AGC Chemicals took measures to reduce the emissions of non-polymeric PFAS during the manufacture of fluoropolymers.

- **30.9.2025** meeting with DG ENV: "Arkema explained that their plant in Pierre Benite produces PVDF without any fluorinated surfactant (since Dec 2024); this shift entailed a reduction in production by 30%. For PFAS contamination remaining in the pipes of the plant (from previous production process), filtration ensures emissions below detection threshold."
- **7.10.2025** meeting with DG ENV: "Daikin presented on-going actions to reduce the emissions of F-gases and possibilities for recycling."
- **16.10.2025** meeting with Séjourné's Cabinet: "Fluoropolymers Product Group's work focuses on three priorities: 1) emissions control and responsible manufacturing of fluoropolymers, with targets for 2024 already met…".
- **16.10.2025** Plastics Europe meeting with Roswall's Cabinet: "indicated the ongoing work on curbing pollution…".
- **6.11.2025** meeting with **Commissioner Valdis Dombrovskis'** Cabinet: Plastics Europe "explained their current priorities focusing on advancing responsible manufacturing and their engagement and targets linked to sustainable manufacturing and emissions control."
- **12.1.2026** Arkema meeting with DGs GROW and ENV: "manufacture and broad use of fluoropolymers in several industrial sectors for key applications was discussed, including the measures taken for the reduction of PFAS emissions in the environment".
- In February 2026 Chemours **offered** DG GROW a site visit to look at "abatement technology". This was declined, but a meeting with DGs GROW and ENV went ahead on **17.3.2026** where "Chemours described their work on emission reductions of PFAS in their different production processes".
- **10.3.2026** Plastics Europe meeting with DG GROW discussed "Emission control and risk management practices applied across the fluoropolymer value chain, including during production, use, and end-of-life".

What others say: Emissions reductions around fluoropolymer and other PFAS-manufacturing plants is welcome news. According to the 2023 **Forever Pollution Project,** some of the biggest PFAS contamination hotspots are around such plants. Reducing emissions will limit the PFAS contamination that workers, local communities, farmers, water providers, health authorities, and others could have to deal with. But considering what they knew about PFAS decades ago, why did fluoropolymer-producers not control their emissions far, far earlier? And crucially: are these emission reductions good enough to justify a full exemption of all fluoropolymers from the uPFAS ban?

WHY DID FLUOROPOLYMER-PRODUCERS NOT CONTROL THEIR EMISSIONS FAR, FAR EARLIER?

In 2023, independent scientists **wrote** that: "during the lifecycle of fluoropolymers, there remains a wide range of emissions and impacts which are ongoing and should not be trivialized." A new **article** by independent scientists significantly questions the emphasis placed on emissions reduction. "Fluoropolymers across their lifecycle: Why 'emission reduction' is not 'safe'" demonstrates that industry's arguments rely upon "flawed assumptions". The independent scientists argue that:

- The most effective emission reduction technology is "not consistently implemented across all PFAS-manufacturing facilities (i.e., producing fluoropolymers)" nor in other plants where fluoropolymers are processed
- Industry is highly focussed on reducing emissions "narrowly" rather than those from the "wider suite" of PFAS released during fluoropolymer production and other phases
- Even "very small relative residual emissions" further add to total PFAS in the environment.

The article **concludes** against the industry demand for a blanket exclusion for fluoropolymers in the uPFAS. The authors write: "the ultimate objective of restricting production and use of PFASs should not be to minimize emissions. It should be to eliminate them."

Moreover, the March 2026 **opinion** on the uPFAS restriction by ECHA's Risk Assessment Committee (RAC) concludes that emission reduction frameworks are a necessary complement to — yet no substitute for— a ban. RAC further concludes that fluoropolymers cause significant PFAS pollution throughout their lifecycle, particularly during manufacturing and waste stages, and should therefore remain in scope of the uPFAS restriction. A summary of the RAC opinion is available **here.**

Verdict:

Industry lobbying has been intense but reductions in emissions from the manufacture of fluoropolymers, while welcome, are not sufficient to end pollution nor to justify exempting fluoropolymers from the uPFAS restriction.

4.2 Industry argument: *'Fluoropolymers can be adequately destroyed at their end-of-life'*

What industry says: A closely-related industry argument to that of fluoropolymer manufacturing emissions discussed above in 4.1, is that fluoropolymers can be adequately destroyed at their end-of-life. On its website the Fluoropolymers Product Group **argues** that "fluoropolymers represent a very small share of total waste and can be effectively managed within existing waste treatment systems." In support it cites a **report** it commissioned from the consultancy firm Ramboll as "reinforcing the argument that [fluoropolymers] be fully exempt from any blanket restriction of PFAS."

How industry lobbies: The fluoropolymer industry is very keen to put forward arguments minimising the pollution threat its products pose in their end-of-life phase:

- **3.7.2025** meeting with Séjourné's Cabinet: "Together with downstream users, AGC Chemicals is paying attention to the emissions during end-of-life".
- **30.9.2025** meeting with DG ENV: "When asked about end-of-life emissions, Arkema informed about an ongoing project with a Veolia incinerator able to destroy PVDF [polyvinylidene difluoride, a thermoplastic fluoropolymer] at only 950°, by adding calcium in the early steps of the process."
- **16.10.2025** meeting with Séjourné's Cabinet: "Fluoropolymers Product Group's work focuses on three priorities: " 2) ensuring sustainable end-of-life management".
- **6.11.2025** meeting with Dombrovskis' Cabinet: Plastics Europe "further shared their work on end-of life management and recyclability of [fluoropolymers]"
- **10.3.2026** meeting with DG GROW: Plastics Europe held discussions on topics which included "emission control and risk management practices applied across the fluoropolymer value chain, including during production, use, and end-of-life [and] End-of-life considerations for fluoropolymer applications".

What others say: It would be ideal if fluoropolymers could be effectively destroyed without causing health or environmental harms in the process. But independent scientists seriously question whether fluoropolymers can be separated from other waste and either recycled or routed to incineration facilities capable of fully destroying them without health and environmental impacts.

The new **article** "Fluoropolymers across their lifecycle: Why 'emission reduction' is not 'safe'" reports that at least one third of fluoropolymers are used in consumer products, which likely ultimately end up in municipal waste schemes. Municipal incinerators do not tend to reach the high temperatures needed to properly mineralise fluoropolymers, over 850° and ideally over 1000°. The scientists argue that, even in the highly unlikely scenario that all fluoropolymer waste is collected and incinerated, "the resulting PFAS emissions at the European scale are still not negligible."

Meanwhile, a 2025 European Environment Agency briefing **concluded** that "we still don't know to what

extent PFAS polymers are degraded to smaller and potentially more bioavailable PFAS compounds when burned in waste incineration facilities across Europe". But there is evidence from China which suggests that incinerated fluoropolymers could account for up to 14 percent of the (short-chained PFAS) TFA **found** in rainwater.

And then there are the wider impacts of high temperature incineration for health, the environment, and the climate. These include secondary contamination in bottom ash, fly ash, and wastewater; the formation of new hazardous substances; the very high energy consumption required; and the resulting greenhouse gas emissions.

Verdict:

The entire lifecycle of fluoropolymers, including at end-of-life, remains a serious pollution concern. The complete destruction of all fluoropolymers is an industry pipedream, which does not justify a fluoropolymer exemption from the uPFAS restriction.

4.3 Industry argument: *'There aren't enough effective alternatives for fluoropolymers'*

What industry says: "There is no alternative" is a regular argument put forward by the PFAS industry. In particular the fluoropolymer industry argues that PFAS-free alternatives **do not exist** for all uses for which they are currently needed, or do not provide the same functioning, implying that they are inadequate for particular uses. This is used to help justify industry's demand for a full exemption of fluoropolymers from the uPFAS restriction.

How industry lobbies: These kinds of messages regularly reach decision-makers:

- **6.5.2025** meeting with Roswall's Cabinet: AGC Chemicals talked about "their ongoing study on alternatives."
- **19.5.2025** meeting about DG GROW's pilot project on the EU's hazardous chemicals substitution centres: the Fluoropolymers Product Group argued "substitution is not yet available for all uses" and that "companies might not be able to share confidential information, within the [pilot project] framework."
- **16.10.2025** meeting with Séjourné's Cabinet: "Fluoropolymers Product Group's work focuses on three priorities [...] 3) assessing alternatives in terms of performance and hazard properties".
- **6.11.2025** meeting with Dombrovskis' Cabinet: Plastics Europe "provided an update on their work related to the assessment of alternatives in view of their safety, sustainability life-cycle and feasibility as well as performance."
- **21.1.2026** meeting with Séjourné's Cabinet: Honeywell/Solstice discussed the "deep concerns about PFAS restriction proposal and the critical consequences for the company's products" and the "need for balanced restriction, reflecting the necessity for PFAS in critical applications where no alternatives exist, while ensuring protection of human health and environment".
- **10.3.2026** meeting with DGs GROW and ENV: "Solstice Advanced Materials described how F-gases are used in various applications and the challenges related with non-PFAS alternatives. They also raised their concerns regarding the Universal PFAS Restriction."
- **24.9.2026** meeting with DGs GROW and ENV: Chemours and Solstice, alongside suppliers of refrigerants used in transport and mobile air conditioning applications, "described the use of PFAS in their sector, opportunities and constraints of substituting PFAS depending on the uses and use conditions."

Earlier this year the Fluoropolymers Product Group published a **study**, written by consultancy firm **Ramboll**, which looks at a handful of case studies of fluoropolymer use in transport, electronics, and semiconductor applications. Ramboll's report finds that "The alternatives reviewed in the selected case studies either failed to meet the key performance criteria or are still lacking sufficient test data and thus cannot be considered as use-ready technically feasible solutions."

However the report also **cautions** that: "it is important to note that the findings from specific case studies cannot be reliably extrapolated to other uses within the same application area or sector, due to the unique performance requirements and contextual factors involved." Nonetheless the Fluoropolymers Product Group uses the study to back up its pre-existing **demand** for "a full exemption of fluoropolymers" from the uPFAS restriction, which it **calls** the "only viable and justified regulatory approach".

The 2025 **Chemical reaction** report documented how, during the first ECHA PFAS consultation in 2023, Chemours mobilised its supply chain customers to deluge the consultation with fluoropolymer-friendly input. In 2026, via webinars and materials (obtained by **WATERSHED Investigations)**, Chemours advised its business customers on how to complete the second ECHA consultation, **including** to: "If warranted, explain the limitations of alternatives". A Chemours lobbyist **verbally** told its April 2026 webinar that as part of the consultation they should, among other things: "justify why you need specific intact PFAS and that's why it cannot be replaced. That has to include a clear explanation of the performance required for your application and how and why the alternatives would fail."

What others say: No one argues that there are available alternatives for *all* uses of PFAS, including fluoropolymers, which are deemed vital. But there are many alternatives available, for essential and non-essential uses, including **electronics,** as documented by ChemSec's **Marketplace tool,** the **ZeroPM** alternative assessment database, and **ChemTrust** among others. Besides, the absence of alternatives for some fluoropolymer uses doesn't justify an exemption for all fluoropolymers. To put it simply, even if there are not yet alternatives for some technical uses of fluoropolymers, that cannot mean that we should continue to put up with Teflon-coated frying pans! Nonetheless there appears to be a strategy on the part of the industry to raise doubts about PFAS-free alternatives, in order to keep all fluoropolymers on the market.

In January 2025 the **Forever Lobbying Project** called "there is no alternative" a mantra of the plastics industry and part of an "economic scaremongering" tactic that often proved effective with decision-makers and which helped frame the policy debate. The Project found that "in many cases, companies had failed to support their "no alternative" claims in their submissions" to ECHA's 2023 consultation on the uPFAS restriction.

A recent **report** from the Danish Technological Institute shows that phasing-out forever chemicals can offer a "strategic opportunity" to downstream users of PFAS. Companies featured in the study reported "improved performance, access to new markets and stronger market positioning after identifying alternatives." As the Institute's director observed: "companies that move early and document their solutions can turn regulatory pressure into a competitive advantage. This is where we see the biggest potential for innovation and growth."

Verdict:

The promise of new rules with precise deadlines drives forward research and development of PFAS-free alternatives. The current absence of alternatives for some essential uses should not be deployed as an excuse to justify exempting all fluoropolymers from the uPFAS restriction.

BOX D: LOBBYIST PROFILE: HONEYWELL EUROPE / SOLSTICE ADVANCED MATERIALS

Honeywell, a US fluoropolymer and F-gas producer, featured prominently in our earlier report **Chemical_reaction,** due to what we called its "PFAS lobby blitz" in 2024.

In October 2025 it split off its "advanced materials" business, including all its PFAS production, into a new entity called **Solstice.** It appears that Honeywell's membership of the Fluoropolymers Product Group has been taken over by Solstice. Solstice has yet to declare an EU lobby budget (as a newly-registered entity it has one year's grace on financial reporting) but for 2023 and 2024, Honeywell posted a spend of at least €2 million, a quadruple of previous annual declarations.

Between them these companies have held at least 7 lobby meetings with the von der Leyen 2 Commission (since December 2024) on the topic of PFAS.

According to ChemSec, Solstice is one of the world's **top 10 PFAS producers,** with at least half its revenue coming from PFAS, especially F-gases used for refrigeration. This is despite the fact that safer and greener alternatives to F-gases have existed and been applied for **decades.** (See Box E.)

We approached Solstice Advanced Materials and Honeywell for a response to our findings but no replies were received.

BOX E: INDUSTRY DEMANDS PROBLEMATIC AND UNNECESSARY F-GAS EXEMPTION IN UPFAS RESTRICTION

Industry lobbies such as the **European Partnership for Energy and the Environment** (EPEE) have **called** for a full, time-unlimited derogation for F-gases in refrigeration, air-conditioning, and heat pump applications from the uPFAS restriction (with a review clause after 10 years to assess again the impacts and the availability of any new alternatives.) EPEE's **members** include AGC Chemicals, Arkema, Chemours, Daikin, and Solstice.

There is **ample evidence** showing the harms that F-gases cause, including that they break down into other PFAS such as TFA, and that they are highly-potent greenhouse gases. A brand new **report** conducted by Öko-Recherche and commissioned by the European Environmental Bureau, Environmental Action Germany (DUH), and ChemSec disputes industry's claim that, because F-gases are already subject to some existing regulations, that they should be exempted from the uPFAS restriction.

On the contrary, regulating F-gases in the uPFAS restriction is required to address their PFAS-specific risks and prevent regrettable substitution with other PFAS substances.

ChemSec has **reported** how the corporations which produce F-gases have been cashing-in on the rush to build more **data centres** to support AI services that require cooling technologies. The NGO **revealed** how producers were "trying to sneak in one more PFAS addiction" and "lock Europe into another avoidable PFAS dependence."

Data centres are **problematic** for various reasons — not least the level of water, energy, and land they require, and their promotion of **Big Tech AI models**. They are certainly not a reason for a derogation or exemption to the uPFAS restriction. Data centre cooling technologies without PFAS "**already exist,** are commercially available, and in fact dominate the market."

4.4 Industry argument: *Fluoropolymers are "critical" chemicals*

What industry says: In the last year or two a debate has been underway at the EU level about whether certain chemical molecules are so "critical" for the EU economy that they should be given a special status, policy support, and even public funding, perhaps via state aid. This debate has been especially helpful to the PFAS industry, including fluoropolymers, whose producers have long argued that these forever chemicals are of critical importance, and thus should be exempted from a ban.

How industry lobbies: The **Critical Chemicals Alliance**, a Commission initiative announced in July 2025 and launched in January 2026, has proven to be a great boon to the fluoropolymer industry. The Alliance, recently **critiqued** by Corporate Europe Observatory and the European Environmental Bureau, has offered several influencing opportunities to the incumbent chemicals industry, including fluoropolymer producers: firstly to get (even) closer to the Commission and participating member state governments, and secondly, to have a big impact on the outcomes of the alliance's work. Notably, the CCA recently presented a **list** of 49 molecules which it deems critical to the EU economy. On that list is PTFE, one of the most well-known fluoropolymers, produced by Chemours as Teflon. Also included was hydrofluoric acid, a precursor of PFAS, which "**irrigates**" fluoropolymers such as PTFE and PVDF. At one point PVDF (which Arkema **produces**) was on a draft list of chemicals to be tested against "criticality" criteria within the Alliance, although unlike PTFE, it did not ultimately make it to the final **list** of 49.

The Commission has yet to clarify how a "critical" label via the CCA would affect the regulation of these substances under the uPFAS restriction. Since the list of 49 molecules was presented to the Commission, Executive Vice-President Séjourné has **indicated** that work will commence on developing a refined list of critical molecules, "to be defined by the end of the year".

All but three members of the Fluoropolymers Product Group **joined** the Alliance, with Syensqo a **member** of core working group 1 which produced the list of critical molecules. Not content with being a member of the CCA's Steering Board, Plastics Europe also **offered** to act as chair or vice-chair of one of the CCA's other three working groups.

ALL BUT THREE MEMBERS OF THE FLUOROPOLYMERS PRODUCT GROUP JOINED THE ALLIANCE

Does the fluoropolymer industry think that the CCA and the discourse around "criticality" may offer a 'get out of jail free' card for fluoropolymers such as PTFE?

- According to a February 2026 **webinar presentation** by **Chemours,** the company "has been invited to the CCA to work on Critical Molecules and Sites especially due to its role in fluoropolymers production at the Dordrecht facility."
- **5.5.2026** meeting with Séjourné's Cabinet: "Chemours explained its involvement in the Critical Chemicals Alliance's Working Group on critical molecules and sites. The company stressed the importance of developing an EU-wide methodology to identify critical molecules and sites across the whole chemicals value chain, covering both traditional and innovative chemistries."
- **11.6.2026** meeting with DG DEFIS: "Presentation of Chemours, including the company's product portfolio (namely on polytetrafluoroethylene – PTFE or Teflon). Chemours underlined the criticality of their applications relevant for the defence industry, both directly and indirectly through other sectors, including the semiconductor and automotive industry."

And it is not just Chemours jumping on the "criticality" bandwagon. Arkema has also used several meetings (**September 2025** and **March**

2026) with the von der Leyen 2 Commission to discuss the CCA. In October 2026 Arkema's President provided the welcome to the CCA's second General Assembly, and subsequently hosted a visit to its nearby plant. On the same day Séjourné announced a €150 million French / EU investment in decarbonisation at an Arkema site in France.

BOX F: LOBBYIST PROFILE: CHEMOURS

Chemours, the US fluoropolymer producer with European sites in the Netherlands, France, Belgium and other countries, was named the "most prolific PFAS lobbyist" in Chemical reaction. This was due to the number of high-level meetings it secured (far outnumbering those of NGOs), and its aggressive lobbying against the uPFAS restriction. Its lobby tactics, alongside face-to-face lobby meetings, included mobilising industry allies to oppose the uPFAS restriction, promoting its voluntary emissions reduction programme as a way to oppose a ban, and using lawyers and lobby consultants to try to defeat the proposal.

Evidence shows that Chemours is again picking up its lobbying on PFAS. The company has held at least eight lobby meetings on PFAS with the second von der Leyen Commission (since December 2024).

In its recent profile of the world's biggest PFAS producers, ChemSec called Chemours the "company most stuck in its old ways, glued to the PFAS wagon and unable (or unwilling) to get off." The profile also notes that "After tripling its production capacity for PFAS refrigerants ... Chemours focuses its innovation efforts on developing new PFAS products."

There have been various cases, including civil, administrative and criminal legal actions against the company dating back to 2010, largely in the Netherlands, relating to its controversial site in Dordrecht, including a new mass claim by local residents. (See Box A.)

We approached Chemours for a response to our findings but no reply was received.

BOX G: LOBBYIST PROFILE: ARKEMA

Arkema is a Paris-based chemical company which has held at least 8 lobby meetings with the von der Leyen 2 Commission (since December 2024) on the topic of PFAS.

Media investigations have shown that Arkema was aware of the dangers of PFAS since at least the late 1990s, and could have limited their spread in the environment ten years before taking action.
In February 2026 at least 192 residents of France's 'chemical valley' near Lyon announced that they were bringing a civil case against two PFAS producers — Arkema and Daikin Chemicals. They seek compensation for the damage they have suffered including anxiety, health concerns, inability to consume locally-produced vegetables and eggs, water quality etc. A criminal investigation is ongoing in parallel. A further challenge against Daikin is also underway regarding that company's request for a permit to produce a new PFAS at its Lyon site.

Arkema is proud to be phasing out PFAS fluorosurfactants (process aids) from its fluoropolymer production, and has lobbied the Commission to communicate that. This is of course a welcome development; another fluoropolymer producer Syensqo has also promoted its own efforts to phase-out fluorosurfactant process aids to the Commission. But as ChemSec says, "when the end product is PFAS, simply removing process aids is not enough."

See annex 1 for the response from Arkema to our findings.

What others say: The Netherlands government, a member of the CCA, has **rejected** the inclusion of PTFE on the Alliance's list of "critical" molecules. As one of the originators of the uPFAS proposal, it "opposes the a priori classification of PFAS – such as PTFE – as critical substances. Instead, a case-by-case assessment is required to weigh the environmental costs against the (economic) benefits of their use."

As the European Environmental Bureau **asks**, in response to the inclusion of PTFE and other harmful chemicals on the **list** of 49 "critical" chemicals: "is "criticality" being used to identify essential societal functions and genuine resilience risks, or to protect incumbent production from the costs of the transition?".

It remains to be seen precisely how the Commission will handle these competing agendas. It is ludicrous that DG GROW, which together with DG ENV is responsible for steering the decision-making on the uPFAS restriction once they receive the final scientific opinions from ECHA, has simultaneously organised an **industry-captured process** which could fundamentally undermine the PFAS proposal.

Verdict:

Whether or not PTFE, other fluoropolymers, and / or hydrofluoric acid are ultimately included in the Commission's final list of "critical" chemicals, the CCA has provided the fluoropolymer lobby with a new opportunity to boost their defence of forever chemicals. The CCA risks undermining the uPFAS restriction process.



5. HOW DECISION-MAKERS RESPOND TO FLUOROPOLYMER INDUSTRY LOBBYING

It appears that industry has succeeded in muddying the uPFAS restriction waters with disputed and discredited arguments and evidence about emissions reduction, safe disposal, lack of alternatives, and the "criticality" of its chemicals.

5.1 European Commission – business as usual agenda

In presenting its overall approach to the uPFAS restriction, an October 2026 **written response** to civil society from Vice-President Séjourné and Commissioner Roswall repeated, in terms, what they have often said before: "the Commission will seriously consider a PFAS ban in consumer uses such as cosmetics, food contact materials and outdoor clothing, as announced in the Chemicals Industry Action Plan in July 2025. Where adequate alternatives in terms of performance and safety are not available, the continued use of PFAS in industrial applications may be allowed for critical applications under strict conditions until acceptable substitutes are found. Derogations for uses will need to be accompanied by requirements to reduce emissions at all lifecycle stages to limit the release of pollutants into the environment and by clear incentives to innovate. Our objective will be to minimise PFAS emissions, while safeguarding critical uses and supporting the EU's resilience and strategic autonomy."

How to interpret this reply? A positive interpretation would be that the Commission is planning action on both consumer and industrial uses of PFAS, and if

there are temporary industrial use derogations, they will be accompanied by emission reduction targets until PFAS for that specific use are phased out.

But there are also many causes for concern within this statement. The Commission mentions a ban on some consumer uses, but consumer uses of PFAS are far broader than the cosmetics, food packaging, and water-proof coats that are specifically mentioned. And even with a wider definition of consumer uses, it is **industrial uses** which are the main contributors to overall PFAS pollution levels.

It appears that there has been a **real push** by some in industry for the Commission to differentiate between these uses, in order to weaken the focus on industrial uses. It is deeply worrying that the Commission's rhetoric has adopted this split, especially because, up to now, the uPFAS restriction proposal has not differentiated between consumer and industrial uses (nor with the third, often forgotten category: professional uses). The "universal" nature of the original proposal meant that *all* PFAS substances and uses (except biocides, pesticides, pharmaceuticals, and veterinary products) were in scope, and that derogations would only apply for specific uses where adequate PFAS-free alternatives do not yet exist, implicitly for essential uses.

IT IS DEEPLY WORRYING THAT THE COMMISSION'S RHETORIC HAS ADOPTED THIS SPLIT, ESPECIALLY BECAUSE, UP TO NOW, THE UPFAS RESTRICTION PROPOSAL HAS NOT DIFFERENTIATED BETWEEN CONSUMER AND INDUSTRIAL USES

A ban which only covers *some* named uses would completely reverse the fundamental aim of the restriction, and implies a serious weakening of ambition. Furthermore, as we have seen in this report, some corporate lobbyists have been demanding exemptions for whole PFAS groups, such as fluoropolymers or F-gases.

Is the Commission heading towards a ban on some limited PFAS uses but a far greater number of derogations than the proposal originally intended, or independent science can justify? Is it even considering a full exemption for fluoropolymers, based on industry's lobby reassurances about emissions reduction and end-of-life disposal, reinforced by assertions about the lack of working alternatives and the "criticality" of these forever chemicals?

If so, the Commission's capitulation to industry would deliver a major win for the lobbyists, and a major blow to EU citizens' health and environmental wellbeing.

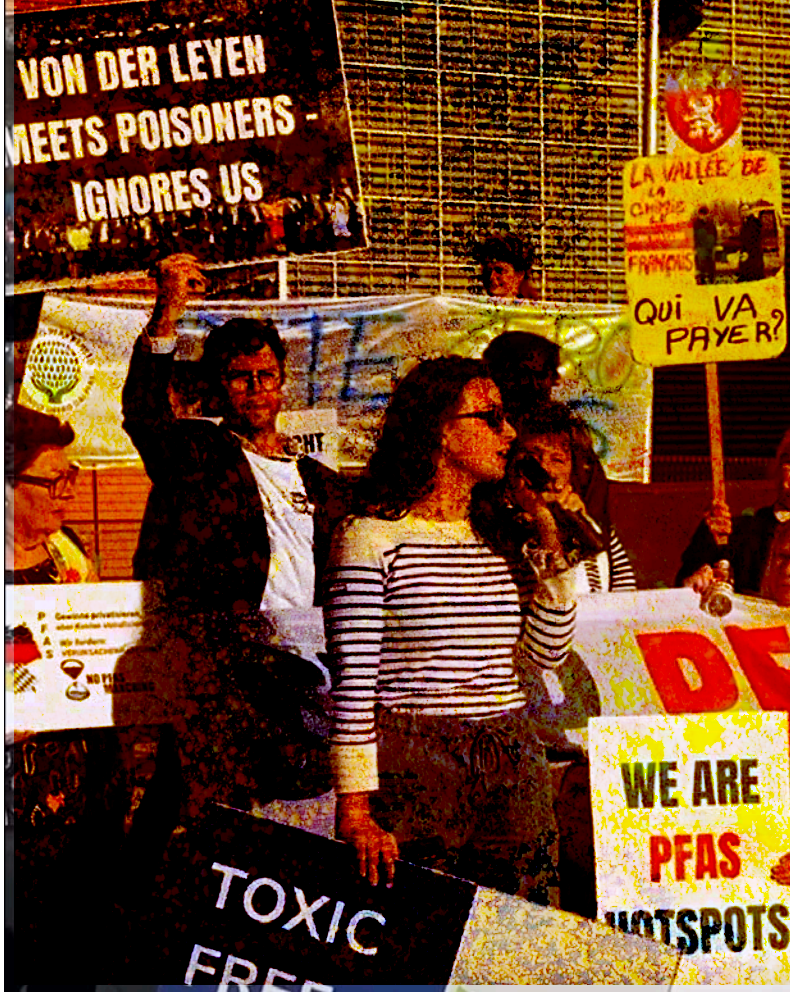
5.2 European Commission: open doors despite critique of PFAS lobbyists' access

A further disappointment in the Commission's approach to the uPFAS restriction so far has been the way it has handled the PFAS industry lobby.

There was a lack of visible action in response to the **Forever Lobbying Project's** assertion that some of the fluoropolymer industry's arguments were "misleading, fearmongering, exaggerated or potentially dishonest". There has been a similar absence of action in response to the **Chemical reaction** report, which found that the PFAS industry had enjoyed high-level political access. The report surveyed 15 Commission directorate-generals about how they handle PFAS industry lobbying, and it found a real lack of awareness of the risks of corporate lobbying on the uPFAS file. Instead, the Commission relied on its existing rulebook around lobby meetings, and DGs largely sought to justify contacts with industry lobbyists, rather than explaining, for example, how they actually implemented and monitored the Commission's **stated commitment** to "appropriate balance and representativeness in the stakeholders" they chose to meet.

A **letter** from Commissioner Roswall which responded to Corporate Europe Observatory's concerns said: "Ensuring transparency and accountability in all lobby and stakeholder meetings and proceedings is essential to maintaining public trust and ensure informed decision-making." While we welcome this statement, it is not at all clear *how* the Commission actively holds PFAS industry lobbyists to account. A short meeting was also held with the Commission to present our findings.

As a symbol of the overall concern, for three years Commission President Ursula von der Leyen has travelled to Antwerp every February to meet with industry voices, with the chemicals sector playing a very prominent role. Meanwhile, groups representing PFAS-affected communities have written to von der Leyen no less than four times since 2023 to request a meeting to discuss their lived experiences of PFAS pollution. Each time they have been turned down.



5.3 Lobbying member states: Germany

Of course the Commission is not the only decision-maker on PFAS. Member states will decide (via **qualified majority voting**) on the Commission's final proposal (in the REACH comitology committee), and thus national governments are also being lobbied.

Chemical reaction exposed PFAS industry lobbying towards the regional and federal levels of government in Germany. Building on that, the German lobby register indicates that **Plastics Europe Deutschland** has lobbied Bundestag members **demanding** "a complete and comprehensive exemption for the manufacture and use of fluoropolymers". **Chemours** has declared that it supports a "nuanced approach to regulating the use of PFAS at European and national level" and is "working towards the goal of Germany speaking out against a blanket ban on PFAS at European level and advocating for a differentiated regulatory approach…". **AGC Chemicals** lists the uPFAS as the only proposed regulation that it is lobbying on in Germany.

Is PFAS industry lobbying having an impact? A November 2024 German regional economic ministers' **resolution** repeats several fluoropolymer industry arguments (including those disputed here and by the **Forever Lobbying Project**). It was sent to several Commission departments as part of the ministers' own lobbying against a strong uPFAS restriction.

At federal level, the German Government's March 2026 "**Chemie Agenda**" demands a "risk-based, differentiated and targeted approach to the various uses of these substances and groups of substances (such as fluoropolymers), which effectively controls the existing risk posed by PFAS, is proportionate and, at the same time, feasible for economic operators and authorities to implement…". This is broadly in line with industry demands, and despite the fact that Germany was one of the original uPFAS dossier submitters, via its Federal Institute for Occupational Safety and Health (**BAuA**).



6. TIME TO END THE LOBBY INFLUENCE OF BIG POLLUTERS

6.1 Vested interests who manufacture doubt

"*The role of certain industries is of concern, in particular because entrenched companies have a vested interest in protecting revenue-generating chemicals, often despite mounting evidence that these substances cause detrimental impacts on public health and / or the environment. Furthermore, these industries often promote the need for ever-expanding chemical production and consumption as an indispensable contribution to economic growth.*"

Momentum is growing to recognise and tackle vested interests in policy-making spaces, especially when harmful products are being regulated. This is a quote from a **paper** by a group of scientists which examined the problem of industry's vested interests – conflicts of interest – in the run-up to the creation of what is now known as the UN Environment Programme's Intergovernmental Science-Policy Panel on Chemicals, Waste and Pollution (**ISP-CWP**). The panel aims to provide "independent, policy-relevant scientific assessments to support evidence-based action on chemicals, waste, and pollution prevention", and the scientists argue that "managing conflicts of interest is important so that the functions of regulatory and scientific bodies are not impaired."

Launching outgoing Special Rapporteur Orellana's report (discussed in section 1.2) in September 2026, **Dr Bethanie Carney Almroth**, the new UN Special Rapporteur on toxics and human rights, emphasised that she wants to ensure decision-makers have access to reliable information on toxic pollution. She also **highlighted** the need to "protect independent science from conflicts of interest, disinformation and manufactured doubt."

Others have written about how vested interests can delay, weaken, or derail regulation that is essential for human health and the environment. In their 2020 book **"Merchants of Doubt"**, the authors **Naomi Oreskes** and Eric M. Conway show how vested interests have again and again manufactured doubt in order to undermine regulation on tobacco, climate change, pesticides, and herbicides.

This creates an eerie sense of déjà vu with the current EU PFAS lobby battle. As this report, alongside **Chemical reaction**, has shown, industry has lobbied heavily to influence and undermine the ambition of the uPFAS restriction. Industry lobbyists,



including PFAS producers and importers, enjoy a high degree of access to the Commission, fuelled by large corporate budgets. Some of this lobbying has already been found to be based on "misleading, fearmongering, exaggerated or potentially dishonest" arguments, as demonstrated by the **Forever Lobbying Project**. Lobbying via disputed and discredited arguments continues. The access of the PFAS industry lobby is not matched by access for PFAS-affected communities, independent scientists, the producers of PFAS alternatives, or NGOs.

This is a deeply problematic situation given that "no PFAS have been **conclusively determined** to be safe".

We already have more than enough evidence to justify an EU-wide restriction on all PFAS, which only allows exemptions for essential uses where there are no adequate alternatives.

Yet there remains a risk that the uPFAS restriction could be sabotaged by an industry which has vested interests, not in public health and environmental protection, but in continuing to import, manufacture, and sell PFAS, including fluoropolymers, at ever growing volumes. And that decision-makers and officials could be swayed to prioritise those vested interests.

6.2 Time to bring in a universal PFAS restriction – and limits on PFAS lobbyists too

It is high time that the Commission, alongside member states and MEPs, recognise the threat that these contemporary 'merchants of doubt', the PFAS-producing industry, pose. That's why we consider that **decision-makers and officials should keep their meetings with PFAS industry manufacturers and importers on the uPFAS restriction to an absolute minimum**. Technical input from these stakeholders may have been useful to ensure a sufficient understanding of how these industries work and the substances they produce. The two ECHA consultations on the uPFAS restriction, and earlier consultations held by the member state dossier submitters, should have gathered such inputs.

But technical inputs should be differentiated from lobbying. The vested interests of the PFAS-producing industry in preserving their business status quo at all costs is in stark contrast with the public interest that generated the need for the regulation of forever chemicals in the first place. Given the profound environmental, health, and economic harm caused by PFAS pollution to society at large (for which the very same industry is now facing multiple legal cases for its conduct) restrictive measures to their lobbying are required.

Instead of those seeking forever profits, PFAS-affected communities, independent scientists and public health experts, the producers of safer

alternatives, and civil society, must have the strongest voices in the uPFAS restriction debate. This would help ensure that a truly effective universal restriction is enacted, alongside the full application of the 'polluter pays' principle to tackle the PFAS pollution crisis. The Commission must recognise **the intrinsic value of citizens' experience from PFAS-affected sites, court findings, and peer-reviewed independent science, and reflect that in who it meets**.

In practice this would mean far fewer meetings with PFAS industry manufacturers and importers, and far more interactions with other voices. Most lobby meetings hosted by the Commission do not currently reflect this approach. However there are one or two encouraging examples which we can point to. On 2 September 2025 Commissioner Roswall **held** a **"roundtable meeting"** with "scientists, government representatives and stakeholders including [a] local collective", which "focused on scientific data on toxicity of certain chemicals, and discussed impact of chemicals, in particular PFAS, on human health and environment." This was followed by a **site visit** to a PFAS hotspot, in the Beveren-Kruibeke-Zwijndrecht region of Belgium. On 15 June 2026 Roswall **convened** the "PFAS clean-up High Level dialogue". Unlike previous **dialogues,** where incumbent chemicals industry lobbyists substantially outnumbered all others, this dialogue saw a greater variety of voices around the table. The Commission was also persuaded to include a citizen from a PFAS-affected community. While still not perfect, this model could be built on.

6.3 Full PFAS lobby transparency

Decision-makers and officials, at EU and member state levels, should also **ensure there is full transparency regarding any discussions held with PFAS manufacturers and importers**. This would mean enacting **specific and additional transparency measures** around all PFAS-supporting industry lobby interactions. All meetings should be **publicly announced, with web-streaming, and the provision of full minutes** (not the current practice of often inadequate summaries). This approach would start to enable real accountability of industry lobbying, with misleading narratives publicly exposed and more easily challenged.

6.4 Decision-makers must systematically scrutinise industry claims

But decision-makers and officials must go further still. Decision-makers should systematically scrutinise the **reports and socio-economic impact assessments** published by industry actors with a strong stake in PFAS-production, as well as other **scientific and ancillary arguments** produced by PFAS-supporting industries that have a clear commercial vested interest. Too often this evidence is accepted and repeated without sufficient interrogation.

A December 2025 **report** commissioned by the European Parliament's Committee on Industry, Research, and Energy, endorsed industry-friendly demands such as "time unlimited derogations for critical sectors, the extension of transition periods for green technologies, and the exclusion of F-gases from the restriction". But this report was substantially **critiqued** by the Global PFAS Science Panel, including for drawing "far-reaching conclusions despite its very limited scope in terms of substances and their uses".

These actions towards **'toxic-free politics'** will help give the uPFAS restriction that the citizens of the EU so desperately need a fighting chance. We cannot allow the industry that brought about this pollution crisis in the first place, to keep muddying the waters in order to protect their profits. Public health and the future of the planet must come first.

ANNEX 1
RESPONSES FROM FLUOROPOLYMERS PRODUCT GROUP, SYENSQO, AND ARKEMA

Below are the responses from the Fluoropolymers Product Group, Syensqo, and Arkema to Corporate Europe Observatory's requests for comment.

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9 November 2026

The Fluoropolymers Product Group (FPG) is committed to providing transparent, evidence-based information to all stakeholders in the ongoing debate on the proposed PFAS restriction. FPG actively contributes to the regulatory dialogue, bringing important perspectives from across the fluoropolymer value chain to policymakers and regulators through official channels, including ECHA's formal consultation process. To support this dialogue, FPG commissioned three studies from independent consultancies, examining alternatives, end-of-life management and socio-economic impacts. All three studies were published in full, including their methodologies, data and assumptions, allowing others to scrutinise their findings.

On alternatives, our study found that, in the cases examined, potential alternatives did not meet the required quality and performance standards. It also showed how difficult it is to assess the availability of alternatives across sectors, since fluoropolymers are used in a wide range of highly specialised and very different industrial processes. These findings are consistent with independent research and with the experiences reported by downstream users across the value chain, including contributions to ECHA's consultation process.

Together with the measurable emission reductions already achieved through the industry's voluntary Manufacturing Programme, this body of evidence seeks to add to the existing knowledge base on how fluoropolymers can be responsibly managed throughout their lifecycle. FPG is committed to keeping this evidence base up to date as new data become available, including by expanding the Manufacturing Programme to cover emissions across the entire manufacturing process. FPG believes that a full exemption for fluoropolymer manufacture and uses, combined with robust emission controls, represents a pragmatic, risk-based approach that addresses concerns about PFAS pollution while safeguarding Europe's industrial competitiveness, supporting innovation, securing critical supply chains and preventing the loss of vital investment.

Kind regards,

Director Fluoropolymers Product Group

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9 November 2026

Please find below Syensqo's statement:

Syensqo stands by the statement issued by the Fluoropolymers Product Group (FPG), which reflects our shared commitment to transparent, science-based dialogue on the proposed PFAS restriction.

Syensqo manufactures fluoropolymers for applications where their unique performance characteristics are required, and we are committed to their responsible manufacture, processing and use. An important focus of our innovation in recent years has been to eliminate the use of fluorosurfactants in the manufacture of our fluoropolymers. Syensqo has developed non-fluorosurfactant (NFS) polymerization technologies that eliminate the use of any surfactant in the manufacturing process while maintaining the performance required for demanding applications. We are implementing these NFS technologies across our fluoropolymer product lines and have recently announced the production stop of our last fluorinated process aid. More info:

Syensqo delivers on its PFAS commitment | Syensqo

Best regards,

Global communications, Head of Media & Reputation

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10 November 2026

I know you received yesterday an answer from FPG and I am sorry our late reply.

Here is Arkema's answer, translated with copilote:

Arkema is a member of several European trade associations representing the industrial sectors in which the Group operates. The list of these organizations is public and available through the European Union Transparency Register. It is therefore well known that Arkema is a member of FPG and that, in this capacity, Group representatives occasionally take part in discussions with public decision-makers alongside other relevant stakeholders, including companies, NGOs, trade unions, consumer associations, and academic institutions. Reports of these meetings are publicly available.

As you point out in your message, the positions advocated by FPG regarding the proposed European restriction on PFAS are public and accessible to all stakeholders. The studies, data, and analyses used to support these positions are also publicly available and contribute to the debate within the consultation process established by the European institutions.

More broadly, the restriction procedure initiated at the European level follows a standard, transparent, and regulated process that provides for the examination of contributions from all stakeholders, as well as their assessment by the competent bodies. It is natural that the various parties involved may express differing views and comment on positions put forward by other stakeholders. This is precisely the purpose of public debate and the consultation process conducted by the authorities.

At the conclusion of this process, decisions do not rest with the stakeholders themselves but with the competent institutions and agencies, whose role is to review all the information submitted to them after hearing all concerned parties. To be useful and constructive, this debate must take place in an atmosphere of mutual respect and transparency.

Finally, we believe that one fundamental principle should guide all of this work: regulatory decisions must be based on a rigorous scientific assessment of the available evidence, making it possible to strike the best balance between protecting human health and the environment, on the one hand, and technical, economic, and industrial realities on the other.

Head of Corporate Media Relations, Arkema

ANNEX 2
METHODOLOGY

The findings of this report are based on analysis of numerous documents received from the European Commission, through access to documents requests; these are accessible via **Ask the EU**. We also referred to the lists of high-level lobby meetings published by the Commission. Since January 2025 this list has included minutes of meetings too. In order to count the number of meetings held by the fluoropolymer industry (defined as Plastics Europe and the members of its Fluoropolymers Product Group) we counted published high-level meetings and others listed in the provided documents using search terms of 'PFAS', specific names of PFAS, 'fluoropolymer', and 'F-gas'. However our figures are likely underestimates. This is because we do not have a complete list of all lobby meetings for this period (including the non-high-level meetings), and because the Commission meeting minutes are sometimes vague, meaning that they do not reflect the topics discussed in detail. No Commission DG provided a full list of meetings held on PFAS, despite this being part of each access to documents request.

Declared lobby spending data was gathered from **Lobbyfacts.eu** and was accurate as of 5 November 2026. Any translations are via deepl.com. We approached Plastics Europe / Fluoropolymers Product Group, AGC Chemicals, Arkema, Chemours, Daikin Chemicals, Syensqo, Solstice Advanced Materials, Honeywell, and European Partnership for Energy and the Environment for a response to our findings. The Fluoropolymers Product Group, Syensqo, and Arkema replied, as detailed in annex 1.

ACKNOWLEDGEMENTS

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Corporate Europe Observatory is a research and campaign group working to expose and challenge the privileged access and influence enjoyed by corporations and their lobby groups in EU policy making. CEO works in close alliance with public interest groups and social movements in and outside of Europe to develop alternatives to the dominance of corporate power.

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