

IOGP Input to the Consultation on a Restriction for per- and polyfluoroalkyl substances (PFAS)

The International Association of Oil & Gas Producers' (IOGP) member companies account for approximately 70% of the oil and gas produced in Europe. IOGP shares the world's ambition to reach the Paris Agreement's goals and supports the EU's objective of climate neutrality by 2050 upon the implementation of enabling measures.

Restriction of PFAS can have complex impacts and requires careful analysis, also in respect of non-PFAS alternatives. For example, effectiveness of the purpose for which PFAS are used may be impacted or there could be a resulting increase in emissions.

IOGP would like to raise the following recommendations and comments in respect of the proposed restriction on PFAS:

- Non-PFAS alternatives should be considered in a holistic manner i.e. potential impact on effectiveness and required volumes, as changes in volumes could have impacts on logistics (increased transport, increase in emissions).
- There should be awareness and consideration of potentially harmful substances in the proposed alternatives.
- We can confirm that the antifoam used for drilling and production purposes are subject to OSPAR HMCS / completion of HOCNF. It should also be considered that all contracting parties in the OSPAR region that are EU member states have to follow REACH as well. HMCS / HOCNF are specific procedures, but they do not replace REACH requirements.
- Through the HMCS system chemical producers/suppliers and operators have extensive experience with substituting hazardous products with less hazardous ones. Substitution processes can be very challenging and it can take many years to fully implement alternatives.
- The oil & gas industry as well as the chemical industry are competitive global businesses, with production within the EU being relatively low compared with other parts of the world. Global oil & gas equipment suppliers may not design PFAS-free equipment (such as subsea installations or packers) or develop specific EU chemicals on that basis. There is a risk that EU oil and gas activities could be "disconnected" from worldwide supply chains and equipment availability.