

Position of the European cookware, cutlery and houseware industries on the draft Belgian legislation to ban PFAS in particular in consumer goods, submitted to the Belgian Chamber of Representatives

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The Federation of European cookware, cutlery and houseware industry (FEC)¹ and its members would like to share its views on the proposed Belgian legislation to ban PFAS, in particular in consumer goods.²

The industry shares society's growing concern about PFAS. Consumers expect products that are safe, respectful of their health and the environment. To meet this expectation, the Chamber of Representatives is considering a ban on certain consumer goods, including cookware and also certain domestic appliances for culinary use.

However, this approach, which makes no distinction between uses, substances or levels of risk, carries a major risk: that of generating major socio-economic consequences, without any concrete environmental benefits. By way of example, the market for cookware (pots and pans) alone represents an estimated turnover of 22 million euros in Belgium.

Isolating "consumer products" from other categories containing PFAS amounts to an oversimplification of a complex reality in terms of uses and exposure. A credible regulatory assessment must be based on a rigorous scientific analysis of real risks, and not on an arbitrary classification based on product type.

The specific use of fluoropolymers in our sector, a sub-category of PFAS, presents no risk under REACH Regulation (EC) No. 1907/2006 and meet the criteria for polymers of "low concern" as defined by the OECD³. They are essential for ensuring the safety, performance and durability of products offered to European consumers.

With this in mind, FEC recommends that the Chamber of Representatives **give priority to a coordinated approach at European level**, rather than a national ban, in line with the Belgian federal government's ambition expressed in its coalition program 2025-2029 to strengthen environmental action through European solutions.

- **A European restriction on PFAS is already being assessed** under REACH Regulation (EC) No. 1907/2006. It is therefore premature to legislate at national level on specific consumer goods while this collective work is underway.
- Member States that have launched national initiatives (such as France and Denmark) have limited their action to specific categories, **without including cookware or domestic appliances**. This reflects their desire not to sacrifice a sector prematurely by allowing European harmonization to take hold, and to avoid regulatory divergence within the EU.
- A unilateral ban on certain consumer goods in Belgium would risk **isolating the Belgian market from the rest of the European Union**, creating a competitive disadvantage for local operators and major difficulties in controlling imports, particularly on e-commerce platforms.

1. Fluoropolymers: scientifically recognized as safe substances

PFAS include several thousand chemical compounds with a wide range of properties. There are two main categories of PFAS, with radically different characteristics:

¹ * FEC is the professional association for the European cookware, cutlery and houseware industry. FEC represents 48 members across Europe: Belgium, Croatia, France, Germany, Italy, Spain, Switzerland, the Netherlands, the United Kingdom, etc. Our members are companies, national associations and suppliers to our industry, representing 47,000 employees and €6 billion in turnover (2023).

² [Voorstel](#) - DOC 56 0815/001 "Proposition de loi visant à réduire l'exposition de la population aux PFAS" (March 26, 2025).

³ OECD. (2009). *Data analysis of the identification of correlations between polymer characteristics and potential for health or ecotoxicological concern* (ENV/JM/MONO(2009)1). Organisation for Economic Co-operation and Development.
[https://one.oecd.org/document/ENV/JM/MONO\(2009\)1/en/pdf](https://one.oecd.org/document/ENV/JM/MONO(2009)1/en/pdf).

PFAS of concern (e.g. PFOS, PFOA)	Fluoropolymers (e.g. PTFE)
Small molecules	Very large molecules
Water-soluble	Insoluble in water
Volatile	Non-volatile
Bioavailable	Not bioavailable
Bioaccumulative	Not bioaccumulative
Mobile	Non-mobile
Toxic	Non-toxic

Fluoropolymers, such as polytetrafluoroethylene (PTFE), are distinguished from non-polymer PFAS by their particular chemical structure: they are very high molecular weight macromolecules (>100,000 g/mol), making them extremely stable and resistant. Their size prevents them from passing through the gastrointestinal barrier, which means they do not enter the human body. Given these characteristics, and in the light of the criteria defined by the OECD, fluoropolymers should be considered as "*polymers of low concern*".

Several decades of scientific research have confirmed that fluoropolymers, including PTFE, do not present the hazards associated with some non-polymer PFAS, for the following reasons in particular:

- **Insolubility and stability:** PTFE is insoluble in water, does not degrade into harmful substances, and does not accumulate in living organisms.
- **No PFOA in manufacturing:** PTFE is manufactured without the use of long-chain fluorinated surfactants such as perfluorooctanoic acid (PFOA), a substance classified as "*of concern*".
- **Negligible environmental impact:** When properly disposed of or recycled, PTFE does not release harmful compounds into the environment. Recent data, including a study conducted by the Karlsruhe Institute of Technology⁴, have shown that over 99.99% of fluoropolymers are completely mineralized under conditions representative of European incinerators.
- **Recognized safety in use:** PTFE is neither bioaccumulable, nor mobile in the environment, nor toxic. These properties are recognized by leading international scientific and health authorities, such as the European Food Safety Authority (EFSA), the German Federal Institute for Risk Assessment (Bundesinstitut für Risikobewertung - BfR), the Organization for Economic Cooperation and Development (OECD), the World Health Organization (WHO) and the U.S. Food and Drug Administration (FDA). In its stable polymerized form, PTFE, used in particular for non-stick coatings on cookware, does not migrate into food or water, guaranteeing safe use for the consumer.

2. Fluoropolymers: essential molecules for product durability and safety

Fluoropolymers play a fundamental role in the durability, safety and economic performance of the cookware and appliances we manufacture. Thanks to their robustness, products designed with these materials can be used repeatedly for many years without loss of performance.

- **Longer equipment life:** Fluoropolymers significantly extend the life of equipment, reducing the need for replacement and contributing to more efficient use of resources. Their wear resistance guarantees long-lasting performance, minimizes waste production and supports circular economy objectives. For example, PTFE non-stick cooking coatings in cookware and domestic appliances, or PTFE-based plastics used for hoses, fluorinated

⁴ Weyandt, N., Zimmermann, S., & Stieglitz, L. (2024). Mineralization of fluoropolymers from combustion in a pilot plant under representative European municipal and hazardous waste combustor conditions. *Chemosphere*, 356, 141799. <https://www.sciencedirect.com/science/article/pii/S0045653524023014?via%3Dihub>.

rubber seals (FKM), offer food-contact components a unique set of essential properties. According to several sources, a general restriction of these substances could result in an estimated total loss of annual sales of cookware between 22 and 40 billion euros across Europe, having a major impact on the industry's contribution to the European economy.

- **Fewer replacements, less environmental impact:** The use of fluoropolymers in non-stick cookware coatings extends the life of utensils, reducing the frequency of replacement by the consumer, the environmental impact of production and transport, and the total volume of waste generated. This increased durability offers significant benefits, notably by limiting cost inflation for the consumer and supporting the European Union's waste hierarchy objectives.
- **Household equipment safety:** Fluoropolymers are essential to the safety functions of many household items of equipment, protecting them against moisture, fire or explosion hazards. Their presence in components such as battery safety membranes, electrical insulators and sealing systems is a major contribution to consumer safety. Replacing them with other materials could compromise existing safety standards and lead to dangerous situations.
- **Lack of viable alternatives in the short term:** There are currently no mature, economically viable alternatives to fluoropolymer-based non-stick baking coatings. Some assessments mention the existence of alternatives for food contact applications, but they do not take into account the level of technological maturity of these solutions, nor the socio-economic consequences for European industry. These alternatives cannot be developed on a large scale within the proposed transition timescales without causing major economic disruption: heavy investment to adapt production tools, loss of competitiveness linked to the speed and profitability of PTFE-based technologies in Europe compared, for example, to ceramic production, and an expected drop in export market share, to the benefit of competitors from third countries.

3. For a responsible and realistic approach: exclude fluoropolymers from proposed restrictions on food-contact products

In the absence of credible and viable alternatives, banning fluoropolymers (in particular) from cookware but also domestic appliances intended for culinary use would expose Belgium, and the European Union more widely, to increased dependence on imports, particularly from third countries that share neither European safety standards nor environmental and social requirements.

Such a measure would be tantamount to transferring our environmental ambitions to regions of the world where practices are far less demanding.

Furthermore, a restriction imposed by Belgium in isolation would be difficult to apply in the context of an open European market. It would distort competition to the detriment of European manufacturers, while remaining inoperable in terms of import control, particularly via e-commerce. This measure would weaken the local industrial fabric over the long term, without generating any concrete environmental benefits.

Europe's cookware sector is based on well-established family-run businesses committed to responsible practices, offering products that are safe, durable and meet the highest standards. They contribute to healthy eating and transparent production, while providing thousands of skilled, stable jobs. Weakening them with an unbalanced measure would undermine European efforts to strengthen their strategic autonomy in critical value chains.

Contrary to popular belief, alternatives to PTFE non-stick coatings, such as ceramic non-stick coatings, are neither sufficiently mature nor suitable for large-scale production. They often have a higher environmental impact, inferior durability and do not meet all consumer expectations. Imposing a hasty substitution would be a strategic error, with major economic and social consequences. An independent study estimates that such a restriction could lead to the loss of 7,400 to 14,800 jobs in the European Economic Area.

European industry is also an active player in the circular economy. Many manufacturers invest in material collection, recycling and recovery programs, making a tangible contribution to the Union's environmental objectives.

This is why, in the event of a proposed law on PFAS in particular on consumer goods continuing its legislative course, we call on the Belgian authorities to exclude fluoropolymers from any restrictions on articles in contact with foodstuffs, such as cookware or domestic appliances. These substances should not be assimilated to other categories of PFAS, in particular non-polymer PFAS, whose toxicity has been scientifically established. When used in our industry, fluoropolymers present a controlled safety profile, a rigorously supervised use, and are essential to the quality of products intended for European consumers.

Should the proposed law of 26 March 2025 continue its legislative course, we hereby submit a series of concrete amendments designed to encourage a more targeted, scientifically based approach that is consistent with European priorities.

- Note: These amendment proposals were drafted in English, based on a translation from the original text written in one of the two official working languages of the Chamber of Representatives. For ease of reference, the amendment proposals in one of the Chamber's working languages are included in the annex.

1st option: delete the proposed restriction on food-contact products in Art.3

Original proposal	Amendment proposed by FEC
Art. 3 An article 9bis/1, worded as follows, is inserted in the above-mentioned chapter IV/1: "Art. 9bis/1. The manufacture, import, export and placing on the market, whether in return for payment or free of charge, of: 1° any product intended to come into contact with foodstuffs containing per- or polyfluoroalkylated substances; 2° any cosmetic product containing perfluoroalkylated or polyfluoroalkylated substances; 3° any wax product containing perfluoroalkylated or polyfluoroalkylated substances; 4° all textile clothing products, footwear and waterproofing agents for textile clothing products and footwear intended for consumers containing perfluoroalkylated or polyfluoroalkylated substances, with the exception of textile clothing and footwear designed for the protection and safety of persons, in particular in the performance of national defense or civil security missions, the list of which is specified by Royal Decree."	Art. 3 An article 9bis/1, worded as follows, is inserted in the above-mentioned chapter IV/1: "Art. 9bis/1. The manufacture, import, export and placing on the market, whether in return for payment or free of charge, of: 1° any product intended to come into contact with foodstuffs containing per- or polyfluoroalkylated substances; 2° any cosmetic product containing perfluoroalkylated or polyfluoroalkylated substances; 3° any wax product containing perfluoroalkylated or polyfluoroalkylated substances; 4° all textile clothing products, footwear and waterproofing agents for textile clothing products and footwear intended for consumers containing perfluoroalkylated or polyfluoroalkylated substances, with the exception of textile clothing and footwear designed for the protection and safety of persons, in particular in the performance of national defense or civil security missions, the list of which is specified by Royal Decree."

2nd option: exclusion of non-soluble polymeric per- or polyfluoroalkylated substances from Art. 4

Original proposal	Amendment proposed by FEC
Art. 4 An article 9bis/2 is inserted in the above-mentioned chapter IV/1, worded as follows: "Art. 9bis/2. The manufacture, import, export and placing on the market, whether in return for payment or free of charge, of any textile product containing perfluoroalkylated or polyfluoroalkylated substances are prohibited, with the exception of textile products required for essential uses, those contributing to the exercise of national sovereignty and for which no alternative solution exists, and technical textiles for industrial use, the list of which is specified by Royal Decree."	Art. 4 An article 9bis/2 is inserted in the above-mentioned chapter IV/1, worded as follows: "Art. 9bis/2. The manufacture, import, export and placing on the market, whether in return for payment or free of charge, of any textile product containing perfluoroalkylated or polyfluoroalkylated substances are prohibited, with the exception of textile products required for essential uses, those contributing to the exercise of national sovereignty and for which no alternative solution exists, and technical textiles for industrial use, the list of which is specified by Royal Decree, as well as, by way of derogation, products intended to come into direct contact with foodstuffs, the functional surfaces of which are based on the use of water-insoluble polymeric per- or polyfluoroalkylated substances.

3rd option: definition of fluoropolymers and their exclusion from Art. 4

Original proposal	Amendment proposed by FEC
Art. 4 An article 9bis/2 is inserted in the above-mentioned chapter IV/1, worded as follows: "Art. 9bis/2. The manufacture, import, export and placing on the market, whether in return for payment or free of charge, of any textile product containing perfluoroalkylated or polyfluoroalkylated substances are prohibited, with the exception of textile products required for essential uses, those contributing to the exercise of national sovereignty and for which no alternative solution exists, and technical textiles for industrial use, the list of which is specified by Royal Decree."	Art. 4 An article 9bis/2 is inserted in the above-mentioned chapter IV/1, worded as follows: "Art. 9bis/2. The manufacture, import, export and placing on the market, whether in return for payment or free of charge, of any textile product containing perfluoroalkylated or polyfluoroalkylated substances are prohibited, with the exception of textile products required for essential uses, those contributing to the exercise of national sovereignty and for which no alternative solution exists, and technical textiles for industrial use, the list of which is specified by Royal Decree, as well as, by way of derogation, products intended to come into direct contact with foodstuffs, the functional surfaces of which are based on the use of fluoropolymers, understood as polymeric substances whose main chain is either a fully or partially fluorinated carbon chain, or a perfluorinated polyether chain, and which are in solid form at normal temperature and pressure;

Annex - Amendment proposals in one of the Chamber's working languages

OPTION 1 : supprimer la proposition de restriction des produits à contact alimentaire dans l'Art.3

Proposition originale	Amendement proposé par la FEC
Art. 3 Dans le chapitre IV/1 précité, il est inséré un article 9bis/1, rédigé comme suit: "Art. 9bis/1. Sont interdites la fabrication, l'importation, l'exportation et la mise sur le marché à titre onéreux ou gratuit de: 1° tout produit destiné à entrer en contact avec les denrées alimentaires contenant des substances per-ou polyfluoroalkylées; 2° tout produit cosmétique contenant des substances perfluoroalkylées ou polyfluoroalkylées; 3° tout produit de fart contenant des substances perfluoroalkylées ou polyfluoroalkylées; 4° tout produit textile d'habillement, toute chaussure et tous agents imperméabilisants de produits textiles d'habillement et de chaussures destinés aux consommateurs contenant des substances perfluoroalkylées ou polyfluoroalkylées, à l'exception des textiles d'habillement et des chaussures qui sont conçus pour la protection et la sécurité des personnes, notamment dans l'accomplissement des missions de défense nationale ou de sécurité civile, et dont la liste est précisée par arrêté royal."	Art. 3 Dans le chapitre IV/1 précité, il est inséré un article 9bis/1, rédigé comme suit: "Art. 9bis/1. Sont interdites la fabrication, l'importation, l'exportation et la mise sur le marché à titre onéreux ou gratuit de: 1° tout produit destiné à entrer en contact avec les denrées alimentaires contenant des substances per-ou polyfluoroalkylées; 2° tout produit cosmétique contenant des substances perfluoroalkylées ou polyfluoroalkylées; 3° tout produit de fart contenant des substances perfluoroalkylées ou polyfluoroalkylées; 4° tout produit textile d'habillement, toute chaussure et tous agents imperméabilisants de produits textiles d'habillement et de chaussures destinés aux consommateurs contenant des substances perfluoroalkylées ou polyfluoroalkylées, à l'exception des textiles d'habillement et des chaussures qui sont conçus pour la protection et la sécurité des personnes, notamment dans l'accomplissement des missions de défense nationale ou de sécurité civile, et dont la liste est précisée par arrêté royal."

OPTION 2 : exclusion des substances per-ou polyfluoroalkylées polymériques non-solubles dans l'Art. 4

Proposition originale	Amendement proposé par la FEC
Art. 4 Dans le chapitre IV/1 précité, il est inséré un article 9bis/2, rédigé comme suit: "Art. 9bis/2. Sont interdites la fabrication, l'importation, l'exportation et la mise sur le marché à titre onéreux ou gratuit de tout produit textile contenant des substances perfluoroalkylées ou polyfluoroalkylées, à l'exception des produits textiles nécessaires à des utilisations essentielles, de ceux contribuant à l'exercice de la souveraineté nationale et pour lesquels il n'existe pas de solution de substitution et des textiles techniques à usage industriel, dont la liste est précisée par arrêté royal."	Art. 4 Dans le chapitre IV/1 précité, il est inséré un article 9bis/2, rédigé comme suit: "Art. 9bis/2. Sont interdites la fabrication, l'importation, l'exportation et la mise sur le marché à titre onéreux ou gratuit de tout produit textile contenant des substances perfluoroalkylées ou polyfluoroalkylées, à l'exception des produits textiles nécessaires à des utilisations essentielles, de ceux contribuant à l'exercice de la souveraineté nationale et pour lesquels il n'existe pas de solution de substitution et des textiles techniques à usage industriel, dont la liste est précisée par arrêté royal, ainsi que, par dérogation, des produits destinés à entrer en contact direct avec les denrées alimentaires, dont les surfaces fonctionnelles reposent sur l'utilisation de substances polymères per-ou polyfluoroalkylées non solubles dans l'eau.

OPTION 3 : définition des fluoropolymères et leur exclusion dans l'Art. 4

Proposition originale	Amendement proposé par la FEC
Art. 4 Dans le chapitre IV/1 précité, il est inséré un article 9bis/2, rédigé comme suit: “Art. 9bis/2. Sont interdites la fabrication, l’importation, l’exportation et la mise sur le marché à titre onéreux ou gratuit de tout produit textile contenant des substances perfluoroalkylées ou polyfluoroalkylées, à l’exception des produits textiles nécessaires à des utilisations essentielles, de ceux contribuant à l’exercice de la souveraineté nationale et pour lesquels il n’existe pas de solution de substitution et des textiles techniques à usage industriel, dont la liste est précisée par arrêté royal.”	Art. 4 Dans le chapitre IV/1 précité, il est inséré un article 9bis/2, rédigé comme suit: “Art. 9bis/2. Sont interdites la fabrication, l’importation, l’exportation et la mise sur le marché à titre onéreux ou gratuit de tout produit textile contenant des substances perfluoroalkylées ou polyfluoroalkylées, à l’exception des produits textiles nécessaires à des utilisations essentielles, de ceux contribuant à l’exercice de la souveraineté nationale et pour lesquels il n’existe pas de solution de substitution et des textiles techniques à usage industriel, dont la liste est précisée par arrêté royal, <i>ainsi que, par dérogation, des produits destinés à entrer en contact direct avec les denrées alimentaires, dont les surfaces fonctionnelles reposent sur l’utilisation des fluoropolymères, entendus comme des substances polymères dont la chaîne principale est soit une chaîne carbonée entièrement ou partiellement fluorée, soit une chaîne de polyéther perfluorée, et qui se présentent sous forme solide à température et pression normales;</i>

Cosignatories

	 IVSH Industrieverband Schneid- und Haushaltswaren	
Federation of European cookware, cutlery and houseware industry	IVSH - Industrieverband Schneid- und Haushaltswaren	Synetam - Union des fabricants d’équipements et d’ustensiles pour la restauration et les arts culinaires
Olivier Brault, President	Jan-Frederik Kremer, Geschäftsführer – General Manager	André-Pierre Doucet, Délégué Général