

**Rogers Corporation Update on European Union Proposed Restrictions
for Per- and Polyfluoroalkyl Substances (PFAS)**

September 2023

<p>PFAS regulatory update</p>	<p>Due to environmental and health concerns over chemicals such as perfluorooctanoic acid (PFOA), the European Union (EU) is considering regulations to ban import, manufacture, and use of a broad category of per- and polyfluoroalkyl substances (PFAS), which, by the EU’s definition, includes polytetrafluoroethylene (PTFE). The United States is also taking actions to remediate existing PFAS contamination and to restrict PFAS chemicals from getting into the environment but has not yet signaled plans for imposing a broad ban similar to what the EU is considering. The European Chemicals Agency (ECHA) published its proposed regulation under REACH in February 2023, which will potentially ban PTFE and other PFAS in Europe by around 2027.</p>
<p>How this may impact you</p>	<p>Rogers Corporation’s broad portfolio of elastomeric materials contains certain material product lines (DeWAL® PTFE, BISCO® Silicones and ARLON® Specialty) which are PTFE-based and/or contain PFAS as defined by the proposed EU regulation. Due to their reliable, stable electrical and mechanical properties, these products are chosen by our customers for a wide range of applications, including aerospace and defense, medical, automotive, semiconductor and general industrial products.</p>
<p>Rogers Corporation’s plan of action</p>	<p>In response to the dynamic regulatory environment, Rogers Corporation has taken the following actions:</p> <ul style="list-style-type: none"> • Ensure supply continuity. Some PTFE resin suppliers have announced their intentions to exit the business. To mitigate supply chain risks, Rogers is expanding qualified PTFE resin supply sources for our products. • Respond to regulators. During ECHA’s open consultation period, Rogers will respond with our recommended extensions to the ban (known as “derogations”). We continue to reach out to customers, suppliers, and industry consortia to learn how we can work together to support a balanced regulatory decision. • Provide elastomeric material solutions for our customers. Rogers Corporation’s demonstrated history of innovation is built upon collaboration with our customers to solve their toughest application challenges. As a result, Rogers Corporation has a broad portfolio of high-performance materials available on the market, and our research and development teams continually develop and launch new solutions for our customers.

<p>What you can do</p>	<p>As a valued partner, we invite you to engage with Rogers in the following ways:</p> <ul style="list-style-type: none"> • Respond to regulators. We believe that the industry should take action to support the appropriate use of fluoropolymers, while also backing science-based initiatives aimed at regulating the substances of greatest concern. During ECHA's open consultation period, the public can provide its input on the pending regulation. <i>Customers who use the materials in question are best suited to identify their required uses and to explain to ECHA firsthand why such applications and products are particularly important. Our understanding is that it is only through this comment process that additional exemptions are considered and granted.</i> Enclosed within this correspondence, you will find details how you can engage in the consultation proceedings. • Collaborate with Rogers. The evolving regulatory landscape provides Rogers Corporation a valuable opportunity to provide our customers with alternative solutions, while simultaneously demonstrating our shared commitment to environmental and social responsibility. Our technical application experts look forward to collaborating with you to find the right solution for your next project.
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Further Information on EU REACH PFAS Regulation Proposal:

Understanding REACH

<https://echa.europa.eu/regulations/reach/understanding-reach>

ECHA publishes PFAS Restriction Proposal

<https://echa.europa.eu/-/echa-publishes-pfas-restriction-proposal>

Annex XV Restriction Proposal

<https://echa.europa.eu/documents/10162/1c480180-ece9-1bdd-1eb8-0f3f8e7c0c49>

Provide your Comments for Annex XV Restriction Report

https://comments.echa.europa.eu/comments_cms/AnnexXVRestrictionDossier.aspx?RObjctId=0b0236e1885e69de

Timeline: Access updated timeline at <https://echa.europa.eu/-/echa-publishes-pfas-restriction-proposal>

What can you do to help?

1. Read the Annex XV Restriction Proposal: <https://echa.europa.eu/documents/10162/1c480180-ece9-1bdd-1eb8-0f3f8e7c0c49>

The table on pages 4-8 sets forth the proposed restriction, and Table 9 (starting on page 115) summarizes the proposed extensions (known as “derogations”). Note whether your applications are mentioned and what regulatory action is proposed (*i.e.*, derogation, no derogation).

- Do you see any incorrect statements related to fluoropolymers or their use in your application?
- Do you agree with the alternatives/replacements identified for fluoropolymers in your application?
- Did you expect to see your application in the proposal, but it is not there?

2. Engage with your relevant trade association at the national or European level.

3. Respond to the open consultation as soon as possible (note the deadline is September 22, 2023).

- If your use is not proposed under a derogation, you should submit scientific and socio-economic evidence to persuade the ECHA committees that your use is appropriate to be derogated.
- In Table 9, if your use is marked for reconsideration, it will require further evidence from stakeholders to support the derogation classification. You should consider submitting supplementary evidence to explain that your use is appropriate and should be derogated.
- Even if your use is proposed for derogation, you may still wish to comment if you have evidence which could influence the length of the derogation.

Information to submit during the public consultation:

1. Detail on the type of fluoropolymer(s) that you use and your application description

2. Detail on the performance criteria, function, and benefits of fluoropolymers in your application

3. Information on the standards or specifications that must be met in your or your customer’s application, highlighting why fluoropolymers are required to meet those standards

4. The availability, suitability, and technical feasibility of alternative substances and/or technologies, and economic consequences of such alternatives, if they exist

5. How you would expect your business, downstream users, and your customers would be impacted if fluoropolymers are regulated under the restriction as currently drafted

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