

# ESG MEETING

Online meeting 18th September 2025



# AGENDA

- **Apologies for absence**
- **Approval minutes from the online meeting – 26<sup>th</sup> June 2025**
- **Digital Product Passport – Guest Speaker Matthias Ekholm at Protokol**
- **Update on ESG Working Group Activities**
- **Update on PFAS – Sandy V.d. Broeck**
- **Update on Standards & Legislations - Sandy V.d. Broeck**
- **Update Reducing Carbon footprints – ESG Working Group**
- **Any other business?**
- **Date, time and venue of the next meeting – 23<sup>rd</sup> October 2025 at 14:00 CET**

# 1. UPDATE ON PFAS FROM ECHA

## **ECHA – RAC Updates PFAS Restriction Proposal** *ECHA/NR/25/28, Helsinki 15 September 2025*

### **Key points include:**

- SEAC will start its consultation in the spring, with the exact date to be disclosed in March 2026.
- This consultation will be conducted via a survey, **without the option for attachments**. The survey will request information on **the impact of the restriction and possible alternatives**.
- ECHA will host a **webinar on 30 October** and provide guidelines to assist with answering the consultation.
- SEAC is expected to finalize its opinion by the end of 2026.

→ **ESA will prepare a Position Statement Paper** prior to the public consultation to be shared with all ESA members

# 1. UPDATE ON PFAS FROM ECHA

The Committees will **NOT** carry out a sector specific evaluation of these further 8 sectors. However, the evaluation of horizontal issues will cover, amongst others, the hazard assessment and risk management measures of general applicability that are able to monitor and limit emissions of PFAS to the environment.

- **printing applications**
  - **sealing applications !!!**
  - **machinery applications**
  - **medical uses (e.g., pharmaceutical packaging, excipients)**
  - **military applications**
  - **explosives**
  - **technical textiles**
  - **wider industrial uses (e.g., solvents, catalysts)**

# 1. UPDATE ON PFAS FROM ECHA

## Alternative restriction options considered:

Beyond a full or time-limited ban, **the proposal now explores conditions for continued PFAS use where risks can be managed**. These options have been assessed for:

- **PFAS manufacturing**
- **transport**
- **electronics and semiconductors**
- **energy**
- **sealing applications !!!**
- **machinery applications**
- **technical textiles**



# RO2: Ban with use-specific derogations

For **fluoropolymer and perfluoropolyethers**, derogations for their use are primarily found under paragraph 6 of the proposed restriction, with durations of either 5 or 12 years after the 18-month transition period.

## 5 Year Derogations

- Polymer processing aids used in flexible plastic film extrusion (for food and non-food applications) (§6a)
- Non-stick coatings in industrial bakeware (§6b)
- Separator coatings for batteries (§6l)
- PTFE (Polytetrafluoroethylene) nozzles in high voltage (>145 kV) switchgears and circuit breakers (§6m) Front- and backsheets in photovoltaic cells (§6n)
- Blisters for solid oral dose formulations (§6s)
- Industrial use of fluoropolymers in filtration and separation media for water treatment and purification (§6y)

## 12 Year Derogations

- Implantable medical devices (including medical implants and meshes) (§6c)
- Invasive medical devices (e.g. tubes and catheters) (§6d)
- Packaging for medical devices (§6e)
- Vehicle systems, components or separate technical units (subject to EU vehicle type approval) and Systems, components or separate technical units (not subject to EU vehicle type approval but where fluoropolymers/PFPEs are strictly necessary for safety or environmental performance) (§6f)
- Heat transfer fluids for industrial and professional use of vapor phase soldering for electronics (§6g)
- Wires and cables (incl. connectors) (§6h)
- Insulation material of electronic components (excluding wires, cables and connectors) (§6i)
- Anti-drip agent in plastics of electronic components (§6j)
- Fuel cells and electrolyzers (§6k)
- Bridge and building bearings (§6o)
- **Sealing applications in industrial uses (§6p)**
- Machinery applications in industrial uses (§6q)
- Coatings in release liners and backing film in transdermal patches (§6r)
- Coated rubber stoppers in vials/flasks for injectable medicinal products (§6t)
- Coated canisters in pressurized metered-dose inhalers (pMDIs) (§6u)
- Coated plungers in pre-filled syringes (§6v)
- Pre-filled injection pens & autoinjectors (§6w)
- Explosives in military applications (§6x)

## RO3: Additional Restriction Options

- In addition, ECHA have considered alternative restriction options, beyond a full ban or a ban with time-limited derogations for certain applications.
- **These were developed based on comments received during the consultation on the Annex XV report. These options were designed to allow for the continued use of PFAS under strict conditions that minimise emissions over the full life - cycle.**
- The alternative options have been assessed by the Dossier Submitter for:
  - PFAS manufacturing (see previous slide);
  - transport;
  - electronics and semiconductors;
  - energy;
  - **sealing applications !**
  - machinery applications; and
  - technical textiles.
- **Management plans and reporting requirements** are integral to the **RO3** framework and are also requirements attached to use-specific derogations under **RO2**.
- These measures are designed to ensure that the continued use of Per- and polyfluoroalkyl substances (PFAS) occurs under **strict conditions that minimise emissions over the full life cycle**.

## ESG WG ACTIVITIES – PFAS RESTRICTION PROCESS

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	INIT.
E,G	PFAS regulation EU <b>FPP4EU Collaboration Platform with SEAC</b>	No invitation for RAC-74 meeting 8 – 12/09/2025. <b>Physically attend meeting</b>	8 – 12/09/2025. <b>15/10/2025</b>	<b>SVdB</b>
	<b>PFAS regulation USA &amp; CAN &amp; UK</b>	<b>FSA webinar Update US DoD IMECH PFAS WG</b>	<b>24/09/2025 See PPT ESG 01/10/2025</b>	<b>SVdB</b>
	<b>FPG Webinar</b>	Attended meeting	<b>08/09/2025</b>	<b>SVdB</b>
	<b>Background Document received</b>	Feedback received from CEFIC sharing same concerns	<b>done</b>	<b>SVdB</b>
	<b>Background Document Preparation for 60 days SEAC public consultation mid 2026</b>	<b>Creating Position Statement Re-activate PFAS Task Force</b>	<b>10/09/2025 online meeting with Ricardo</b>	<b>SVdB/ PFAS Task force</b>



## ESG WG ACTIVITIES – PEROXIDES RESTRICTIONS

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	INIT.
E,	<b>Peroxides in Elastomers for Food consumption</b>	Andy will take on this project	tbd	<b>AL</b>
	Alternative to dicumyl peroxide	2,5-Dimethyl-2,5-di (tert-butylperoxy) hexane		
	dicumyl peroxide levels are below the limits set out in REACH			
	<b>Erik Uiterwijk sent official French document .</b>	<b>To be discussed</b>	<b>Next ESG meeting 18/09/2025</b>	<b>EU/CG /AL</b>
	<b>According to EU also Trelleborg &amp; Freudenberg are monitoring the Peroxides topic.</b>	<b>Any feedback is more than welcome</b>	<b>tbd</b>	<b>EU/CG</b>

# **ESG WG ACTIVITIES – PEROXIDES RESTRICTIONS**

## **ELASTOMERS IN CONTACT WITH FOOD**

**Official Journal of the French Republic – August 7, 2025**

### **Background**

- Notice from the Ministry of Economy, Finance, and Industrial & Digital Sovereignty
- Concerns substances listed in Annex VIII of the Order of August 5, 2020
- Application dossiers submitted before July 1, 2025

## Avis et communications

### AVIS DIVERS

MINISTÈRE DE L'ÉCONOMIE, DES FINANCES  
ET DE LA SOUVERAINETÉ INDUSTRIELLE ET NUMÉRIQUE

Avis relatif aux substances de l'annexe VIII de l'arrêté du 5 août 2020 relatif aux matériaux et objets en caoutchouc destinés à entrer en contact avec des denrées alimentaires et aux sucettes pour nourrissons et enfants en bas-âge dont le dossier nécessaire à leur évaluation a été déposé à la DGCCRF avant le 1<sup>er</sup> juillet 2025.

NOR : EDC2522763V

Le présent avis comporte en annexe la liste des constituants autorisés dans les matériaux et objets en caoutchouc destinés à entrer en contact avec des denrées alimentaires de l'annexe VIII de l'arrêté du 5 août 2020 relatif aux matériaux et objets en caoutchouc destinés à entrer en contact avec des denrées alimentaires et aux sucettes pour nourrissons et enfants en bas-âge pour lesquels les dossiers nécessaires à leur évaluation ont été déposés avant le 1<sup>er</sup> juillet 2025, comme le prévoit le II de l'article 4 de l'arrêté précité.

Les constituants listés pourront être utilisés dans la fabrication des matériaux et objets en caoutchouc dans les conditions définies dans l'annexe VIII, jusqu'à la fin du processus d'évaluation par l'Agence nationale de sécurité sanitaire de l'alimentation, de l'environnement et du travail (ANSES).

Les substances de l'annexe VIII de l'arrêté du 5 août 2020 non reprises en annexe de cet avis ne peuvent plus être utilisées sauf si les exigences de l'article 10 de l'arrêté susmentionné sont remplies.

Il est rappelé que conformément au 2<sup>o</sup> du II de l'article 4 de l'arrêté du 5 août 2020 : « Lorsque l'indication "Limites de migration spécifique à définir" apparaît dans les restrictions des constituants du tableau de l'annexe VIII, la migration de ces constituants, ainsi que celle de leurs produits de décomposition ou de réaction, des intermédiaires de réaction et de leurs impuretés, ne doit pas présenter de risque pour la santé des consommateurs au sens de l'article 3 du règlement du 27 octobre 2004 susvisé. »

### ANNEXE

NOM DE LA SUBSTANCE ROLE	NUMERO CAS	LIMITATIONS OU RESTRICTIONS D'EMPLOI
<b>Monomères ou substances de départ</b>		
5-vinylnorbornène	3048-64-4	Limites de migration spécifique à définir
<b>Accélérateurs</b>		
Sel de zinc de 2-mercaptobenzothiazole	155-04-4	Limites de migration spécifique à définir
N-Cyclohexyl-benzothiazole-2-sulfénamide	95-33-0	Limites de migration spécifique à définir
Disulfure de tétrabenzylthiurame	benzyl : 10591-85-2	Limites de migration spécifique à définir
Dialkyls ou benzylthiocarbamates de zinc alkyl = éthyl, butyl	Benzyl : 14726-36-4 Butyl : 136-23-2 Ethyl : 14324-55-1	Limites de migration spécifique à définir LMS(T) Zinc = 5mg/kg
0,0 di - (1-méthyléthyl) téra-thio - bis - thioformate (= tétrasulfure de di - (isopropyl xanthogénate))		Limites de migration spécifique à définir
<b>Agents de vulcanisation</b>		
2,5-bis(tert-butylperoxy)-2,5-diméthylhexane	78-63-7	(1) Limites de migration spécifique à définir
(1) Absence de réaction positive aux peroxydes selon la méthode de la Pharmacopée européenne		
<b>Charges</b>		
Silicate d'aluminium	12141-46-7	Aluminium : LMS(T) = 1 mg/kg

7 août 2025

JOURNAL OFFICIEL DE LA RÉPUBLIQUE FRANÇAISE

Texte 178 sur 199

NOM DE LA SUBSTANCE ROLE	NUMERO CAS	LIMITATIONS OU RESTRICTIONS D'EMPLOI
		Les substances se présentant sous une forme nanométrique ne peuvent être utilisées que si elles sont expressément autorisées et mentionnées dans les spécifications.
<b>Émulsifiants et dispersants</b>		
Alkyl (C <sub>8</sub> - C <sub>18</sub> ) arène (= naphthalène, benzène) sulfonates, sulfates et phosphates et leurs sels de sodium ou de calcium		Limites de migration spécifique à définir
<b>Agents de protection contre la fermentation</b>		
1,2-benzisothiazoline-3-one	2634-33-5	Q <sub>max</sub> = 0,02% LMS = 0,5 mg/kg

# **ESG WG ACTIVITIES – PEROXIDES RESTRICTIONS**

## **ELASTOMERS IN CONTACT WITH FOOD**

### **Key Provisions**

- **The listed constituents may be used in the manufacture of rubber materials and articles under the conditions defined in Annex VIII, until the evaluation process by the French Agency for Food, Environmental and Occupational Health & Safety (ANSES) is completed.**
- **The substances from Annex VIII of the Order of August 5, 2020 not included in this notice's annex may no longer be used unless the requirements of Article 10 of the aforementioned Order are met.**

## ESG WG ACTIVITIES – PLASTIC REDUCTION

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	INIT.
E,	<b>PLASTIC REDUCTION</b>	Reducing Carbon footprint		<b>SVdB</b>
	<b>SWG SPACERS</b>	Evaluation of samples, few responses received. Finalisation project	< end 05/25 < end 06/25	<b>SVdB</b> <b>SVdB</b>
	→	<b>Specification sheets and contact details will be provided on our webpage</b>	<b>&lt; end 09/25</b>	<b>SVdB</b>
	<b>Stretch film Biowrap</b>	<b>Sample,available roll for evaluation,</b>	<b>&lt; end 09/25</b>	<b>SVdB</b>
	→	Few responses received		
	→	<b>Specification sheet and contact details will be provided on our webpage</b>	<b>&lt; end 09/25</b>	<b>SVdB</b>

## ESG WG ACTIVITIES – PLASTIC REDUCTION

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	INIT.
E,	<b>Stretch white tape for Braided packing box</b>	Evaluation by Burgmann Packings	tbd	TH
	<b>White wrapping paper with ECO logo</b>	Samples sent to workshop to be used	completed	
	<b>Stretchable white paper</b>	Test were not succesfull	done	TH
		→ <b>Initial inner waxed box and outer standard box</b> → <b>White paper wrapped around braided packing</b>	done	TH
		→ See next slide		



## ESG WG ACTIVITIES – PLASTIC REDUCTION



## ESG WG ACTIVITIES – RECYCLING FP

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	INIT.
E,	<b>Recycling Fluoropolymers</b>	Francesca will check with FGD members on current recycling activities	Update next FGD meeting	FT
	<b>3M Dyneon</b> <b>Fluormetall</b>	<b>Will be approached by FT &amp; Alberto Rocca</b> <b>Ongoing contacts → ESA PPT</b> <b>Recycling virgin PTFE</b>	< update next ESG WG meeting	<b>FT/AR</b>
	<b>Plastics Europe approached by SVdB</b>	<b>Feedback received from FPG</b>	<b>Next slide</b>	<b>SVdB</b>
	<b>Infraserv</b>	<b>Ralf Kulesa will approach</b>		<b>RK</b>

# ESG WG ACTIVITIES – EoL for FP

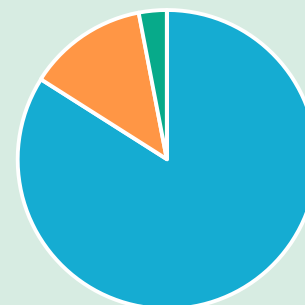
## End-of-Life (EoL)

- Main concerns for fluoropolymers are PFAS emissions at manufacturing and end-of-life stages.

## FPG Action:

- FPG has initiated a new study to build a comprehensive understanding of what happens in this phase at EoL.
- Focus is incineration and recyclability of fluoropolymers.
- Report expected Q4 2025

## What we know about at FP at End of Life



- 84% end up in waste to energy
- 13% are landfilled
- 3% are recycled

Pro-K engaged Conversio in 2022 to develop a report on fluoropolymers at EoL. The report was submitted to the ECHA consultation in 2023

## ESG WG – NEW INITIATIVES – QA SURVEY

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	INIT.
E,	PLASTIC REDUCTION	Reducing Carbon footprint		SVdB
	NEW INITIATIVES			
	Defining 3-4 product related initiatives to reduce Carbon footprint	e.g. supply chain, production, transport,.. <b>See next initiative</b>	Next ESG meeting	ALL SVdB

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	INIT.
ESG	ESG			
	Survey on ESG policy by sending Questionnaire ESA members	Outcome Questionnaire on next slides. → <b>positive response by 15 members!</b>	<b>ESG WG</b> <b>11/09/2025</b>	ALL/ SVdB
	Update ESA Code of Conduct	Published in English and German on ESA website	done	SVdB/ AL

# ESG WORKING GROUP CURRENT ACTIVITIES

**What ESG-related topics or challenges are most important to your company today?**

## **Streamlined ESG Topics & Challenges**

### **1. Carbon footprint reduction & climate impact**

Includes energy use reduction, green energy/solar, sustainable mobility, and Scope 3 emissions.

**2. Sustainable supply chains & responsible procurement** Covering transparency, traceability, circularity, recycling/upcycling, and supplier compliance (e.g., Ecovadis, ISO 14001).

### **3. Regulatory compliance & standards**

Meeting environmental regulations across different countries and aligning with frameworks such as LCA, EPD, PEF, Higg Index.

### **4. Sustainable innovation & customer solutions**

Developing environmentally friendly products/services and supporting customer sustainability goals.

### **5. Health, safety & working conditions**

Safe workplaces, training & education, employee well-being.

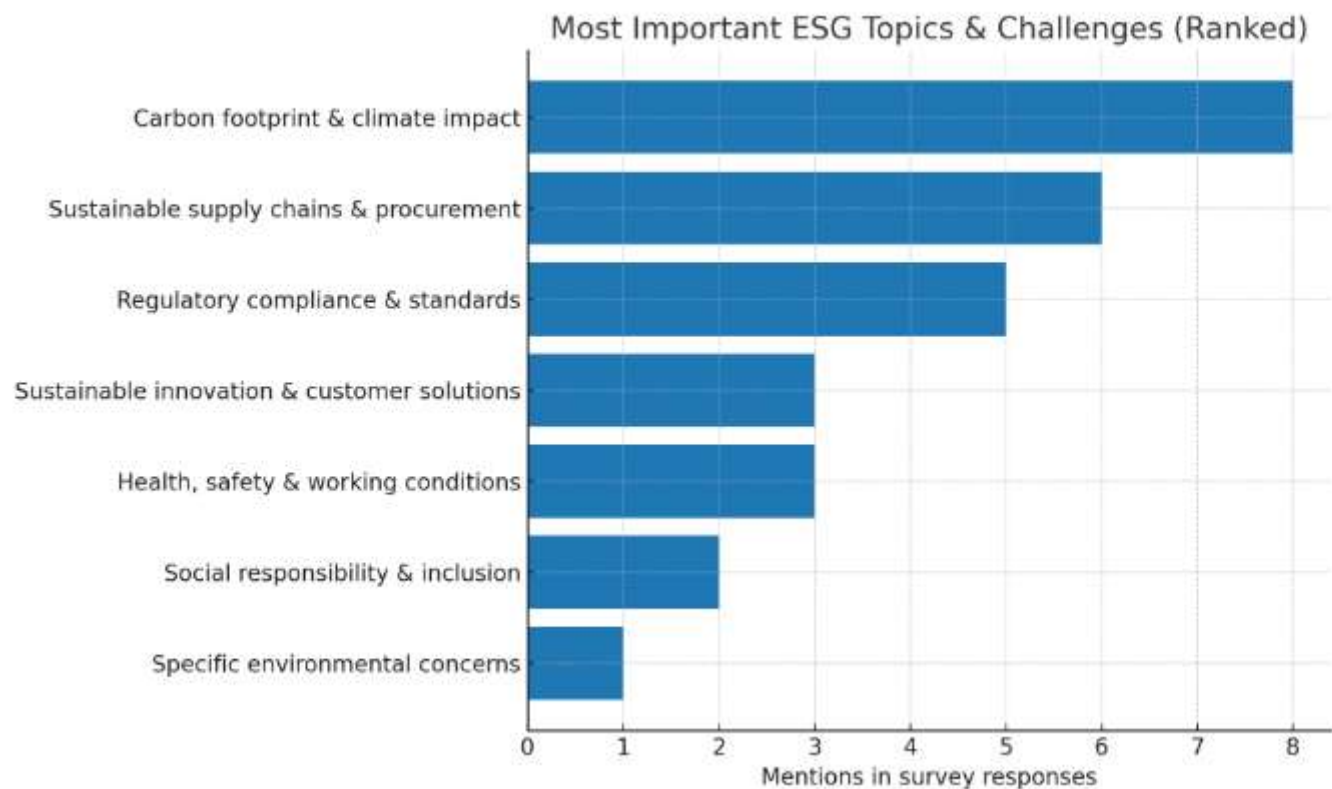
### **6. Social responsibility & inclusion**

Diversity, equity, and inclusion (DEI), people-focused ESG aspects.

### **7. Specific environmental concerns**

PFAS, Dicumyl peroxide, waste management, and other critical environmental risks

# ESG WORKING GROUP CURRENT ACTIVITIES





# ESG WORKING GROUP CURRENT ACTIVITIES

**Which ESG areas would you like to see the ESA focus on or develop guidance, tools, or support for?**

## **1.Regulatory compliance & advocacy**

Guidance on regulations, practical impacts of legislation, early-stage advocacy (e.g., **PFAS restrictions**), **standardization support**, compliance training.

## **2.Carbon footprint reduction & tools**

Footprint calculators, LCA data sets, reuse/recycling of materials, recovered carbon black/pyrolysis oils, reducing footprint of parts and supply chains.

## **3.Circular economy & waste reduction**

Support reuse, repair, recycling, optimized packaging, environmentally friendly material cycles.

## **4.Supply chain transparency & engagement**

Measuring footprint of individual parts, engaging suppliers and processors, acting as a supply chain conductor.

## **5.Life Cycle Assessment (LCA) tools & frameworks**

Generic LCA online tools (e.g., for gaskets), datasets for footprint calculations.

## **6.Reporting, transparency & diversity**

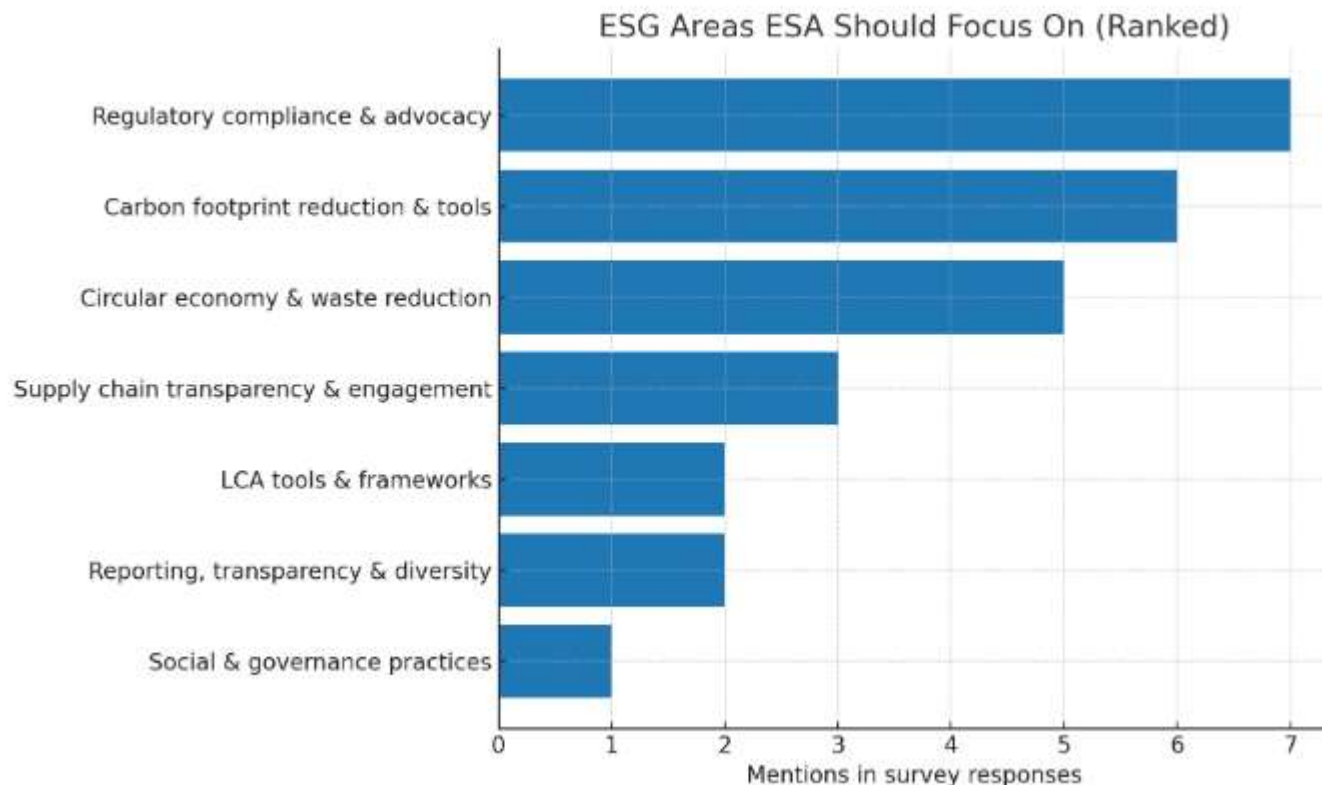
Reporting frameworks, transparency in ESG practices, diversity.

## **7.Social & governance practices**

Promoting best practices among member companies, countering unfair competition with lower standards.

## ESG WORKING GROUP CURRENT ACTIVITIES

Which ESG areas would you like to see the ESA focus on or develop guidance, tools, or support for?



## ESG WORKING GROUP CURRENT ACTIVITIES

**Does your company have an internal ESG, sustainability, or Corporate Social Responsibility (CSR) team/department?**

**Answers : Yes : 10  
No : 5**

**If yes, would they be open to sharing best practices or contributing expertise to the ESG working group?**

**Answers : Yes : 3  
No : 1  
Possibly – please contact me for a conversation : 7  
Abstain : 4**

## ESG WORKING GROUP CURRENT ACTIVITIES

**What formats would be most useful for ESG-related resources or initiatives?  
(Select all that apply)**

Best practice guidelines	: 12
Templates and tools (e.g., reporting or calculation tools)	: 8
Case studies from member companies	: 6
Webinars or workshops	: 5
Benchmarking reports	: 6
ESG working group participation	: 5
Other	: 3

**If you selected Other, please specify further:**

Combine value chain for impacting third parties.

Place ESA entity (not single company reps) into European Directive and Standards working groups

## ESG WG ACTIVITIES – DIGITAL PRODUCT PASSPORT

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	
E,G	STANDARDS & REGULAT.			SVdB
	DIGITAL PRODUCT PASSPORT	Invited Guest speaker Mathew Ekholm from Protokol	18/09/2025 ESG Meeting	SVdB

## ESG WG ACTIVITIES – EDW / DWD

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	
G	<b>STANDARDS &amp; REGULAT.</b>			<b>SVdB</b>
	EU DRINKING WATER DIRECTIVE DWD 2020/2184)	Existing national system can be used during transition period	2027-2032	<b>SVdB</b>
	<b>DWD</b>	<b>Stakeholder Meeting in Brussels</b>	<b>27-28/10/2025</b>	<b>SVdB</b>
	<b>EDW → harmonisation of testing materials in contact with drinking water</b>	<b>Endorsed and signed letter sent to EC</b>	<b>EDW meeting with ENV Commisioner 22/09/2025</b>	
	<b>EDW plenary meeting</b>	<b>Plenary meetings in Brussels</b>	<b>23/09/2025 online 20/11/2025</b>	<b>SVdB</b>



# ESG WORKING GROUP CURRENT ACTIVITIES

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	
G	<b>STANDARDS &amp; REGULAT.</b>			<b>SVdB</b>
	<p>EDW Working Group Industry Implementation Guide</p> <p>→ Reference to legal documents, guidance document intended</p> <p>→ Target 30 pages tekst with main aspects + annexes</p> <p>→ Annexes: pictures + examples of different chapters</p> <p>→ Informal document</p>	<p>Preparing draft by EDW – WG Finalization and publication of the guide</p> <p>1,Introduction 2,definitions 3.Process overview 4.Explaining the process</p> <p>Annexes I.Examples wetted surfaces II.Examples products/groups III.Check list assembled products manufacturers iV.Example Quality Management structure V.Practical issues VI.Examples Certificates</p>	<p>09/2025 12/2025</p>	

## ESG WORKING GROUP CURRENT ACTIVITIES

ESG	ACTIVITIES	NEXT STEPS	TIMELINE	INIT.
S,	YOUNG ENGINEERS			SVdB
	Student at University of Mannheim	Project defined for Packings Divisiont. Test graphite based packing with H2 to be compared with He		
	→	<b>Martin Wand will start above project</b>	<b>Start 10/25</b>	<b>SVdB/ RV</b>
	NEW INITIATIVES			
	<b>Proposal by AL to approach student who could start a project on recycling, LCA, EoL of FP.</b>	<b>Any proposal more than welcome</b>	<b>tbd</b>	<b>tbd</b>