

2023 Annual Report





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01. Message from President and Secretary General



Urs Hauser / FEA President



Alain D'haese / FEA Secretary General

Dear Esteemed FEA Member, dear friends,

While we emerge from the shadow of the COVID-19 pandemic, we acknowledge that the impact still casts a palpable presence in our industry. Inflation may have peaked, and certain supply chains are struggling due to the war in Ukraine. Nevertheless, there are silver linings on the horizon.

A renewed consumer demand for cosmetic aerosol dispensers is noticeable, with a gradual easing of inflation and steady normalisation of supply chains. However, positive trends come with their challenges, most notably a cluster of legislative proposals under scrutiny at the EU level. With the upcoming 2024 European elections, debates within the European Parliament could intensify, potentially leading to heavy compromises with considerable resource implications.

Nevertheless, remember that every cloud has a silver lining. The increasing demand

In difficult times, no single entity can effectively overcome obstacles in isolation. Now, more than ever, it is crucial that we come together and leverage our collective insights and expertise to navigate these storms. Unity, after all, is our greatest strength.

for cosmetic aerosol dispensers reflects the long-lasting acceptance of aerosols. Despite the potential hurdles of meeting ever-tightening regulations and environmental standards, these challenges provide us with opportunities to innovate and become even more resilient.

Your contribution, through shared experiences and knowledge, will guide our industry's path forward. We firmly believe in your expertise investment as the stepping stone towards a vibrant aerosol future.

Thank you for entrusting us with this journey forward. Your belief in the FEA fuels our commitment and determination.

02. Steering FEA in 2023

The Steering Committee made stable decisions throughout 2022/23, ensuring that relevant technical issues were accordingly discussed and handled. This report gives a summary of the main priorities which the Steering Committee managed.



Volker Krampe / Chair of the Steering Committee



In September 2022, the Steering Committee re-elected for two years Volker KRAMPE (IGA) as Chair and Laurent FLOND (CFA) and Adrian MCCRETTON (BAMA) as Deputy Chairs.



Laurent Flond / Deputy Chair of the Steering Committee



Adrian McCretton / Deputy Chair of the Steering Committee

➤ **The role of the Steering Committee and the way it works evolved further.** Working Groups (WGs) and Task Forces (TFs) Chairs submit pre-reads before Committee meetings. The Committee reviews all terms of reference and ratifies the outcome of elections in WGs and TFs. The Committee approves a list of priorities with task allocations. It is foreseen that an additional exhaustive priority list will be considered, and CNAD will develop it.

➤ Despite the support of the EC ADD Working Group, in October 2017, less progress was made with the European Commission to initiate the legislative process for an adaptation to technical progress (ATP) of the Aerosol Dispensers Directive (ADD) 75/324/EEC, towards the increase of the maximum total capacity of plastic aerosol dispensers meeting the requirements of appropriate testing.

In March 2023, **FEA launched its Code of Practice for PET Aerosol Dispenser Recyclability in the EU**. This initiative intends to demonstrate transparently the transition of the aerosol industry to fully recyclable plastic aerosol dispensers. The dialogue with the European Commission remains open.

➤ The **General Product Safety Regulation (EU) 2023/988 (GPSR)** has been published in the Official Journal of the EU. For aerosol dispensers, this Regulation applies only to those aspects and risks or categories of risks that are not covered by the Aerosol Dispensers Directive 75/324/EEC. The definition of a safe product does not include the word 'misuse' as advocated by FEA.

➤ **The Steering Committee approved a new FEA Guide on compartmented technologies.** This guide aims to provide essential quality and safety recommendations for aerosol dispensers using compartmented technologies aligned with current and in anticipation of European legislation. It provides general descriptions and offers suggestions but cannot exhaustively cover the numerous specific designs that exist or will appear on the market.

➤ **The Steering Committee also approved a briefing paper on refillable pressurised dispensers.** These products may not be defined as aerosol dispensers and do not fall under the Aerosol Dispensers Directive 75/324/EEC scope. This briefing paper intends to provide essential advice for the safe and legal re-filling / re-charging, transport and placing of refillable pressurised dispensers on the market. The substantial variety of possible technologies and marketing models and their combinations demonstrate the need for a case-by-case approach.



Aerosol containers are generally made from aluminium or steel – permanent recyclable materials with established market demand. When separated during collection or sorting, post-consumer aerosols can be recovered and recycled as part of the appropriate packaging material stream. Large numbers of empty aerosols are successfully recycled in Europe and worldwide.

➤ In revising the **Packaging & Packaging Waste Directive (PPWD) 94/62/EC**, FEA advocates that all aerosol dispensers – independently of the container material – should be covered by the same legal provisions.

Even if they represent less than 1% of the aerosol market, the same provisions should cover glass and plastic aerosols.



➤ The **UN Sub-Committee of Experts on the Transport of Dangerous Goods** expressed the will to align some requirements between Aerosols and Chemicals under pressure. FEA proactively sent an informal paper to align special provision 63 of the UN Model Regulations with the text of special provision 362.

FEA also participated in discussions concerning the differentiation between **UN 1950 Aerosols and UN 2037 Receptacles, small, containing gas (gas cartridges)**, led by the German authorities. The initial proposal would have led to a significant impact on the aerosol industry in transferring many product categories into UN 2037.

In the **UN Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods**, a proposal to exempt local deliveries of small amounts of end consumer products from the application of the dangerous goods regulations is still under discussion.



FEA is actively supporting this approach because it has a positive impact on e-commerce. However, the proposal must still be outbalanced to allow modern 'click & collect' and 'click & deliver' concepts.

➤ Concerning the revision of the **Fluorinated Greenhouse Gases (F-gases) Regulation**, the aerosol dispenser industry already substituted HFC-134a (non-flammable liquefied gas, GWP 1430) with

HFO-1234ze (non-flammable liquefied gas, GWP 1.37). The HFO-1234ze is the sole remaining non-flammable liquefied propellant gas to formulate non-flammable technical aerosols necessary for safety reasons.

The new prohibition proposed by the European Parliament will disrupt the placing on the market of essential technical aerosols that need to remain non-flammable, such as aerosol dispensers for the disinfection of aircraft to prevent the spread of illnesses like malaria, zika or chikungunya in the EU; or aerosol dispensers for testing fire detectors which alert people in case of fire at home, office, in hotels or restaurants. FEA advocated an amended wording to adopt an efficient but workable prohibition.

➤ Concerning the **public consultation from ECHA on the future restriction of PFAS**, FEA provided input to defend the use of **HFO-1234ze for aerosol dispensers that must be non-flammable for safety reasons**. The HFO-1234ze is not persistent like common PFAS. Its atmospheric lifetime is only 19 days. The quantities used by the aerosol dispenser industry are low. The Trifluoroacetic acid (TFA) yield is estimated at only 2%. Certain technical aerosols have no alternative to using HFO-1234ze to guarantee non-flammability while maintaining product performance.

➤ FEA continued to be involved in the Downstream Users of Chemicals Co-ordination Group (DUCC)

FEA and DUCC contributed to issues related to the **EU Chemicals Strategy for Sustainability**:

- Hazard-based Generic Risk management Approach (GRA),
- Mixture Assessment Factor (MAF),
- One Substance One Assessment,
- Safe and Sustainable by Design (SSbD),
- speeding up REACH processes,
- digitalisation,
- revision of the Classification, Labelling and Packaging (CLP) Regulation.

DUCC also supports the **implementation of EU REACH and EU CLP**. A Delegated Regulation amending the CLP Regulation to include the new hazard classes has been published in the Official Journal of the European Union: Endocrine disruptor (human health), Endocrine disruptor (environment), Persistent, Bioaccumulative and Toxic (PBT) or Very Persistent, Very Bioaccumulative (vPvB), Persistent, Mobile and Toxic (PMT) or Very Persistent, Very Mobile (vPvM). New mixtures shall be classified and labelled from 1 May 2026.



➤ Concerning the **UN GHS**, FEA continued participating in relevant correspondence working groups.

➤ **FEA also monitored the development of other legislative proposals** such as the EU Ambient Air Quality Directive (AAQD), the EU Eco-design Sustainable Products Regulation (ESPR), the EU Seveso III Directive, the EU Green Claims Directive, the EU Product Liability Directive, the EU Sustainable Finance, the EU Corporate Sustainability Due Diligence Directive, the EU Protection of the environment through criminal law, and the EU Critical Raw Materials Regulation.

➤ The revised **Machinery Regulation** has been published in the OJEU and will apply from January 2027.

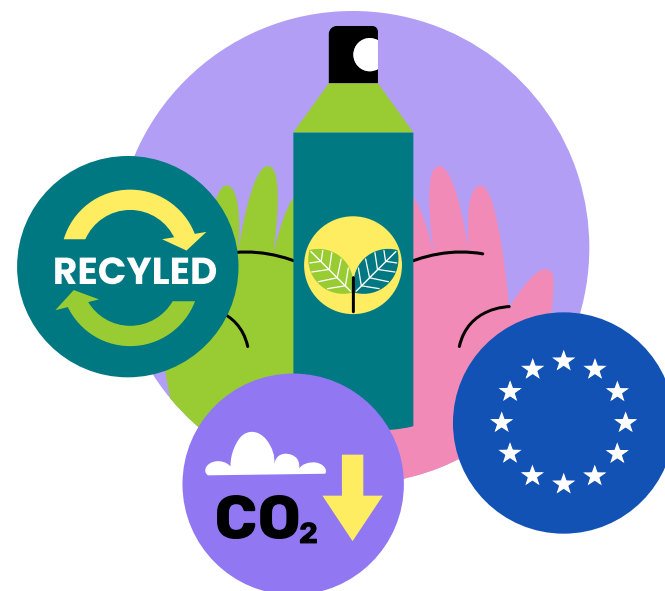
➤ The **Deforestation-free Products Regulation** has been published in the OJEU and will apply from December 2024 – June 2025 for micro-undertakings or small undertakings.

This is a very challenging period due to numerous legislative proposals under discussion. Additionally, tensions within the European Parliament and between the Council and the European Parliament will increase with the upcoming 2024 European elections, which could result in hard compromises that might not be realistic for the industry.

The aerosol format remains popular with consumers. The constant development of products that meet consumers' expectations against increasingly stringent regulations and environmental standards presents challenges and opportunities.

The aerosol dispenser industry should continue to use its knowledge and expertise to meet all these challenges.

Finally, **we thank the supportive Committee members** for their fruitful discussions, input, and decisions based on deep expertise from all working groups and task forces.



We also want to thank the **Board of Directors** for their trust and support and the **FEA Secretariat** for its excellent work.

Companies are also vital in allowing their experts to share their insights and knowledge for leading the whole aerosol industry. We remain thoroughly convinced that this is a sound investment into the future of aerosols.

03. The Committee of National Association Directors (CNAD)



Jean Blottière / Chair of the CNAD

Our main objective was to deliver exemplary service to members and support them by providing insights and implementing actions through FEA's various Working Groups (WGs) and Task Forces (TFs). In a challenging economic environment, each National Association Director had to find the right balance between new and existing members towards financial sustainability.

2022 saw a return to normality in terms of meeting in person again. **CNAD had the opportunity to meet in Lisbon last September** and enjoy the conviviality of such events.

➤ **The Committee continued to coordinate advocacy activities** related to a future adaptation of the Aerosol Dispensers Directive 75/324/EEC (plastic aerosols), health classification of aerosols

under CLP, standardisation (CEN), and transport of aerosols. Recycling aerosols was a prominent subject due to revising the Packaging & Packaging Waste Directive (PPWD), which should become a Regulation. CNAD insight view of specific national issues has been vital for FEA to raise its concerns and opinions at the EU level. Additionally, fellow Directors advocated FEA positions at the national authority level.



The Committee devised a solution to support the collection of the sector's yearly European statistics, which was successfully implemented in 2023.



- **CNAD also initiated training on competition law for all FEA members and participants in various Committees, WGs and TFs.** This was particularly important due to liability changes.
- **The committee fostered the promotion of the FEAerosol2022 in Lisbon and the ADF 2022 and 2023,** in line with the agreement signed between FEA and Easyfairs.
- Finally, **CNAD initiated a joint CNAD / BoD meeting in January 2023 in Paris** to cover significant points related to ways of working, communication, and raising awareness of national priorities impacting the aerosol business. The meeting outcome supported FEA to move forward and endorsed the excellent work done by the Brussels Secretariat.

All the activities and initiatives of last year were only possible with all my colleagues' full approval and commitment! I want to thank them all for their continuous support.



04. FEA Networking: a world of opportunities



Valérie Boulet /
Communications & Events
Manager



➤ Late January 2023, FEA in partnership with ADF Paris, part of Paris Packaging Week, shared the mission to run the world's only annual packaging innovation event dedicated to aerosols and dispensing technology.

This was a resounding success, with some 2,500 visitors and 100 exhibitors, over 20 hours of inspiring conference programme and the announcement of the winners of the ADF Innovation Awards closed with a cocktail offered on the FEA lounge, the perfect meeting place to reconnect with the aerosol community.



Next ADF Paris event will take place on 17 and 18 January 2024 and the Federation is actively participating in its content and growth

- The Global Aerosol Dispenser Summit led by an experienced moderator, with focus on key technical, sustainability and regulatory challenges for the market
- A competition for start-ups with services and/or products linked to the aerosol dispenser industry
- Alain D'haese, FEA Secretary General is appointed Chairman of the 2024 ADF Innovation Awards Jury and an FEA Award called FEA Aerosol Technology of the Year will open to entries

05. Facts and figures



European production

- According to reported fillings for European aerosol products, overall unit production remained stable at **5.3 billion in 2022**.

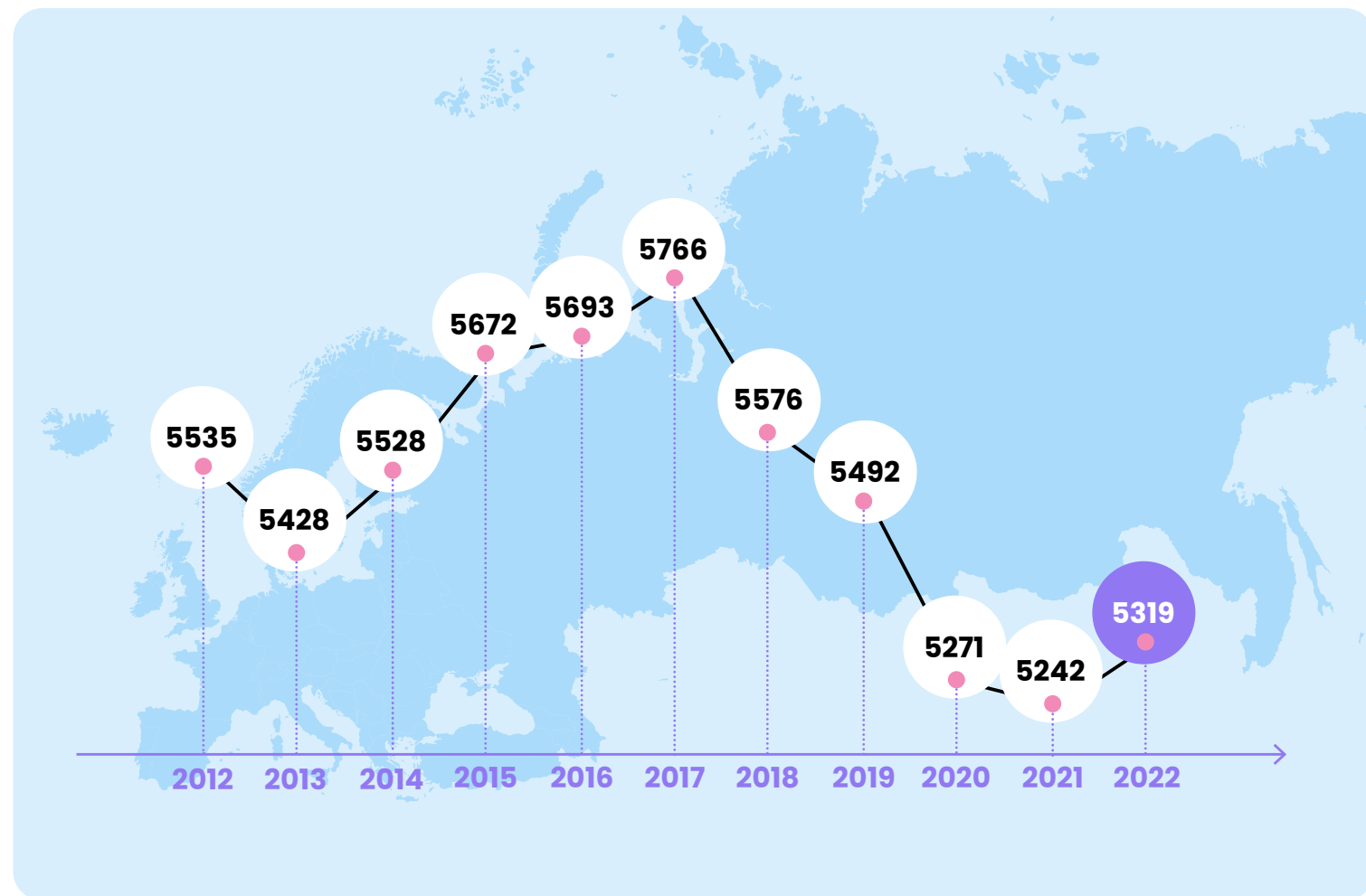


Fig.1 European production evolution (2012-2022, in '000 000 units)



Production by country

➤ The United Kingdom, Germany and France provide more than 55% of the annual aerosol production in Europe in all segments. Together with Italy, Netherlands and Spain, more than 4.0 billion units of aerosol dispensers are produced in 2022.

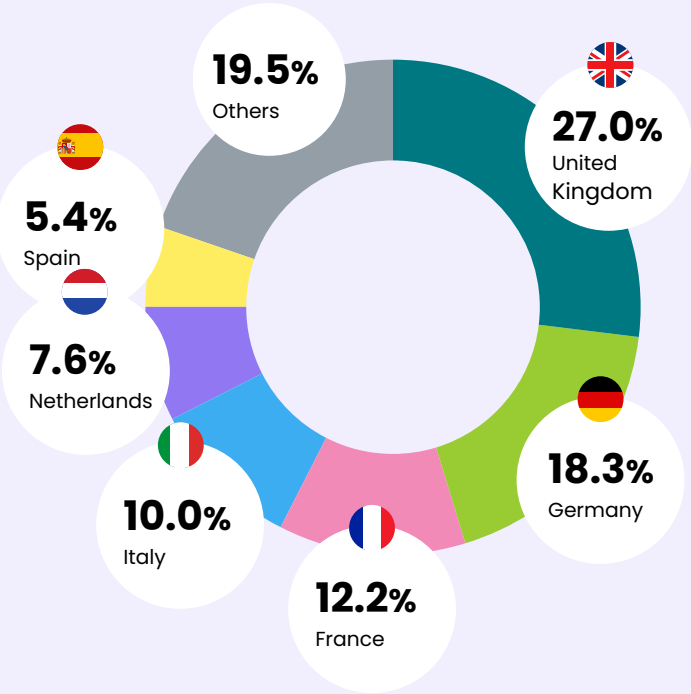


Fig.2 Aerosol production by country (2022)

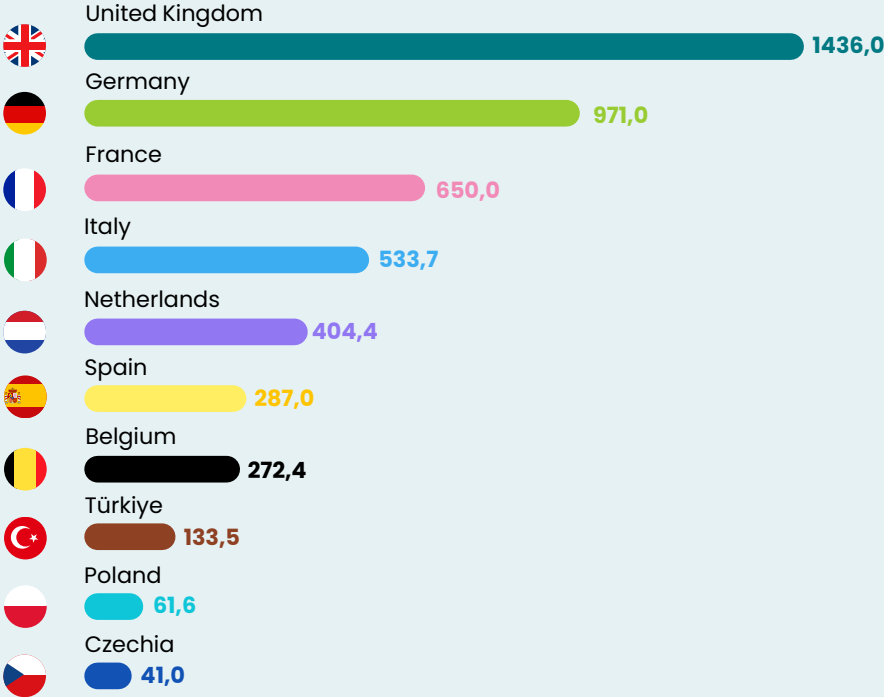
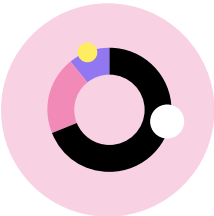
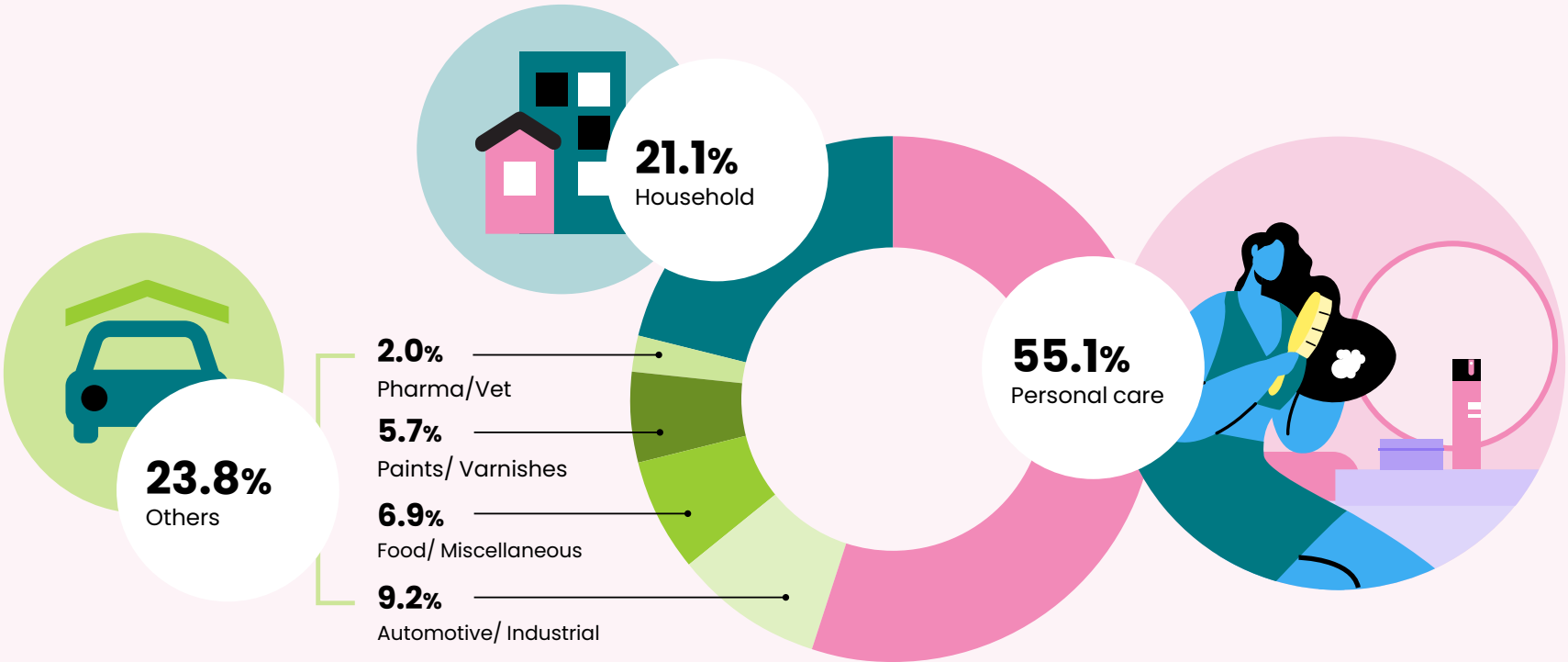


Fig.3 European production (2022, main countries, in '000 000 units)



Production by segment

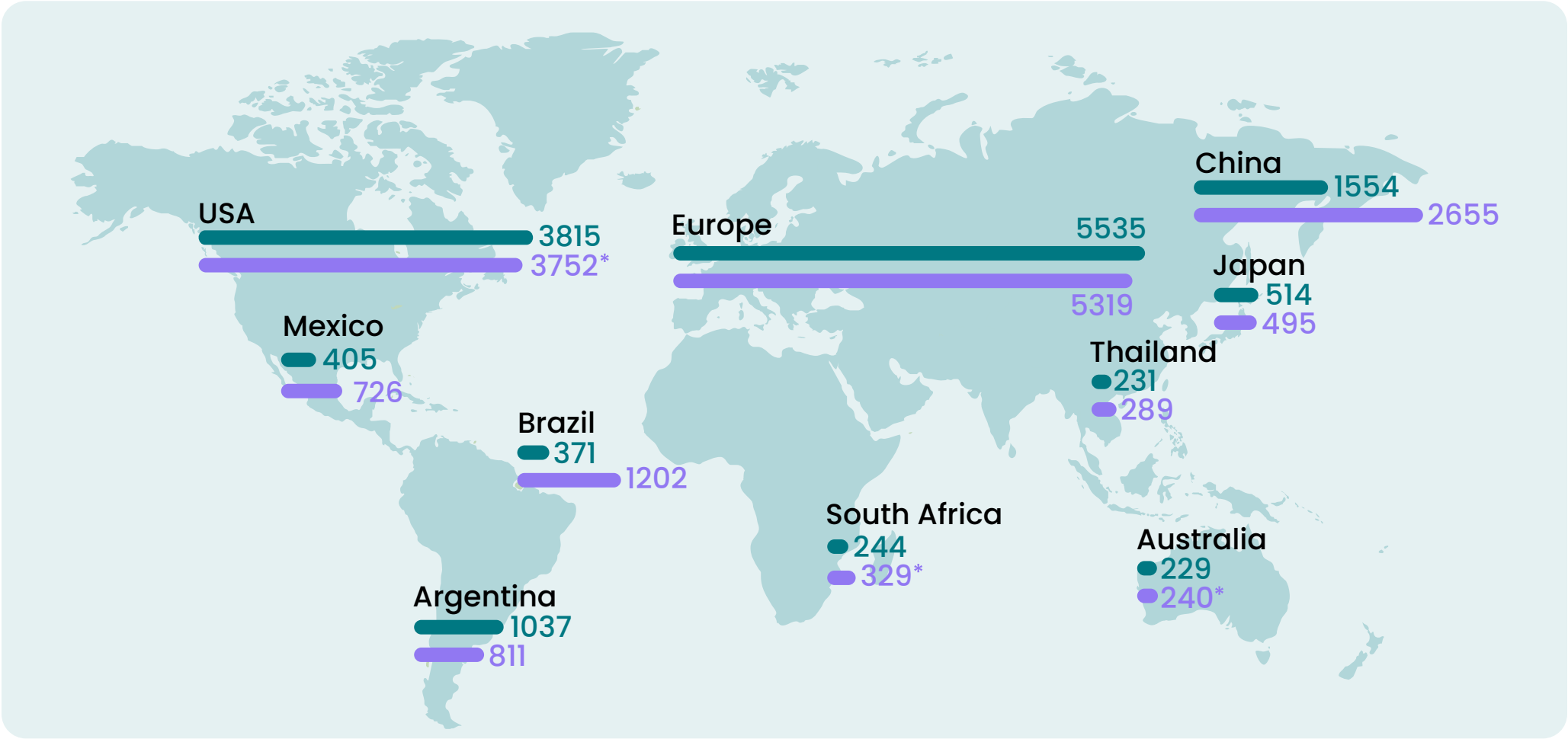
➤ Aerosol containers are primarily made of steel and aluminium, whereas glass and plastic containers remain marginal. **Cosmetics and household products represent more than three-quarter of the European production.**





Worldwide production

(in '000 000 units) 2012 2022



*Based on the data currently available. No data is available for 2022.

06. Board of Directors and Secretariat



Urs Hauser
ASA / Switzerland
President



Jean-Marie Poppe
DETIC / Belgium
**Vice-President
& Treasurer**



Federico Bisio
CFA / France
Vice-President



Murdoch Crawford
BAMA / UK



Francesco Maestri
AIA / Italy



Özgür Öztürk
ASAD / Türkiye



Asier Santos
AEDA / Spain



Josée Wullings
NAV / The Netherlands



Volker Krampe
IGA / Germany
**Chair of the Steering
Committee**



Adrian McCretton
BAMA / UK
**Steering Committee
Deputy Chair**



Laurent Flond
CFA / France
**Steering Committee
Deputy Chair**



Jean Blottière
CFA / France
Chair of the CNAD



Alain D'haese
FEA Secretary General



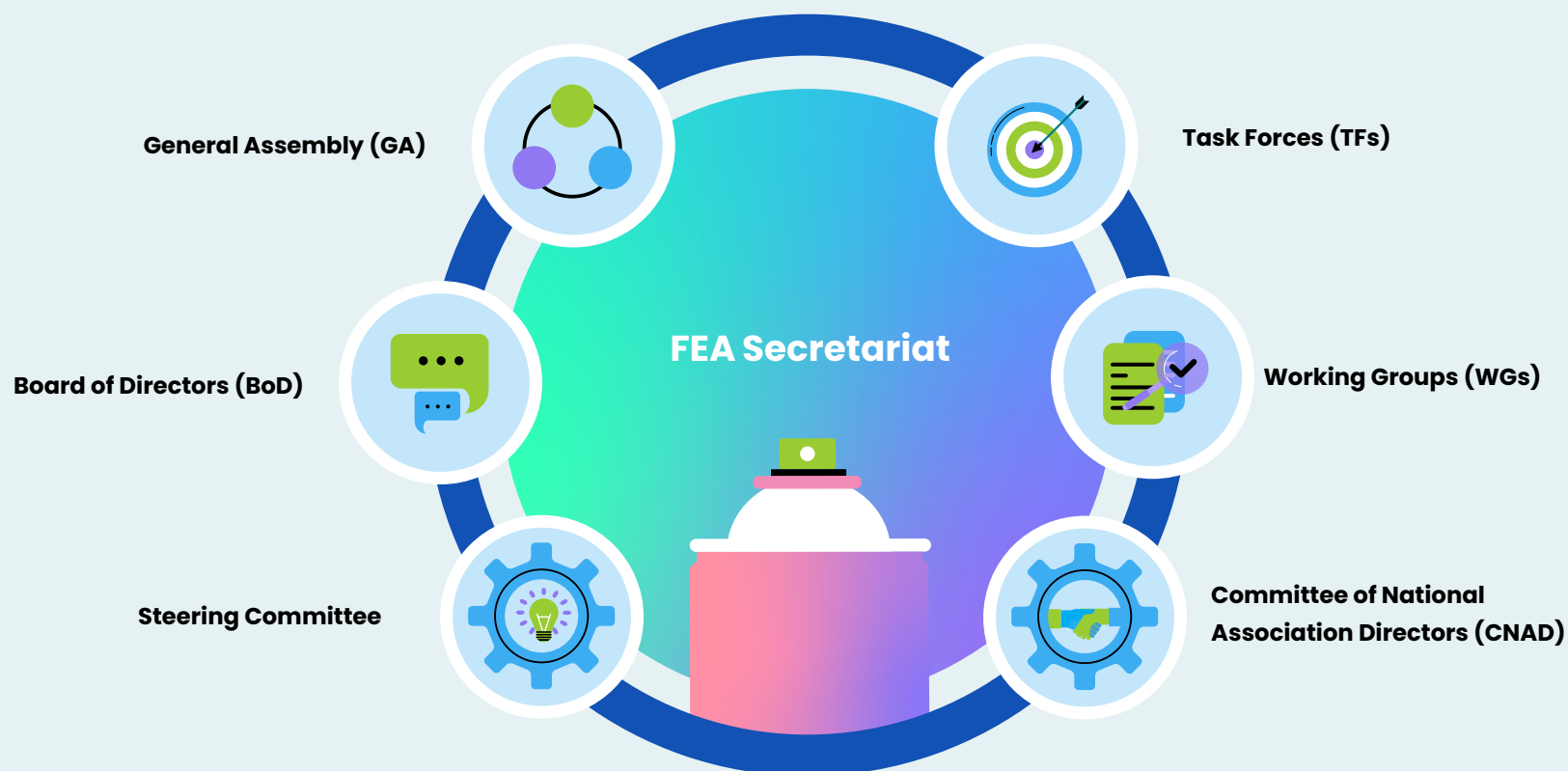
Valérie Boulet
**FEA Communications &
Events Manager**

FEA Secretariat

07. Governance and structure



An effective network to the benefit of the European aerosol industry



08. Membership

FEA represents

18 European countries which include

+350 

small and medium-sized enterprises (SMEs) and multinationals active in the aerosol dispenser industry.



Europe

➤ Austria

FCIO – Fachverband Der Chemischen Industrie Österreichs

 fcio.at

➤ Belgium

DETIC – Association belgo-luxembourgeoise des producteurs et des distributeurs de cosmétiques, détergents, produits d'entretien, colles et mastics, biocides et aérosols

 be-aerosols.be  secretariat-detic@detic.be

➤ Czechia

CAS – Ceske Aerosolo Ve Sdruzeni

 cz-aerosol.cz  info@cz-aerosol.cz

➤ Denmark

AIB – Aerosol Industries Brancheforening

➤ Finland

FAA – Finnish Aerosol Association

➤ France

CFA – Comité Français Des Aerosols

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➤ Germany

IGA – Industrie-Gemeinschaft Aerosole e.V.

 aerosolverband.de  info@aerosolverband.de

➤ Greece

HAA – Hellenic Aerosol Association

 haa.gr  haaent@otenet.gr

➤ Hungary

AAH – Aerosol Association Of Hungary

 csaosz@csaosz.hu

➤ Italy

AIA – Associazione Italiana Aerosol

 aia.federchimica.it  aia@federchimica.it

➤ Netherland

NAV – Nederlandse Aerosol Vereniging

 nav-aerosol.nl  info@nav-aerosol.nl

➤ Poland

PACDI – Polish Association Of Cosmetic And Detergent Industry

 kosmetyki-detergenty.pl  biuro@kosmetyki-detergenty.pl

➤ Portugal

APA – Associacao Portuguesa De Aerosois

 apa@fiovde.pt

➤ Spain

AEDA – Asociacion Espanola De Aerosoles

 aeda.org  aeda@aeda.org

✦ Sweden

SAA – Swedish Aerosol Association

✦ Switzerland

ASA – Association Suisse De Aerosol

 swiss-aerosol.ch  info@swiss-aerosol.ch

✦ Türkiye

ASAD – Aerosol Sana Yicileri Dernegi

 aerosol.org.tr  asad@aerosol.org.tr

✦ United Kingdom

BAMA – British Aerosol Manufacturers Association

 bama.co.uk  enquiries@bama.co.uk

Worldwide

✦ Argentina

CADEA – Camara Argentina Del Aerosol

 cadea.org.ar  cadea@cadea.org.ar

✦ Australia

AAANZ – Aerosol Association of Australia & New Zealand

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✦ Brazil

ABAS – Associacao Brasileira De Aerossois

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✦ China

CPF – China Packaging Federation

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✦ Chile

CCA – Camara Chilena Del Aerosol

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✦ Mexico

IMAAC – Instituto Mexicano del Aerosol A.C.

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✦ Russia

RAF – Russian Aerosol Federation

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✦ Ukraine

UUAPM – Ukrainian Union of Aerosol Products Manufacturers

 uuapm2020@gmail.com

✦ USA

HCPA – The Household and Commercial Products Association

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✦ Venezuela

CAVEA – Camara Venezolana De Aerosoles

 cavea111@gmail.com

FEA – European Aerosol Federation

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