

DECEMBER 2024

2024 UPDATE ON SUSTAINABILITY REGULATIONS FOR THE WINTER SPORTS INDUSTRY

Atomic's Ski Industry Climate Summit – ISPO Munich

J E R O M E P E R O – F E S I S E C R E T A R Y G E N E R A L



Federation of the European
Sporting Goods Industry



PURPOSE

UNITE THE SPORTING GOODS
INDUSTRY BEHIND **COMMON
GOALS** THAT ACCELERATE A
PROSPEROUS AND
SUSTAINABLE ENVIRONMENT
IN EUROPE

AMBITION



EUROPE'S LEADING TRADE
ASSOCIATION, **SHAPING
POLICIES** THAT BENEFIT
MEMBERS, PEOPLE AND
PLANET

VALUES

WE ARE
COMMITTED TO
CARRYING OUT OUR
MISSION THROUGH
UNITY, INTEGRITY &
TRUST



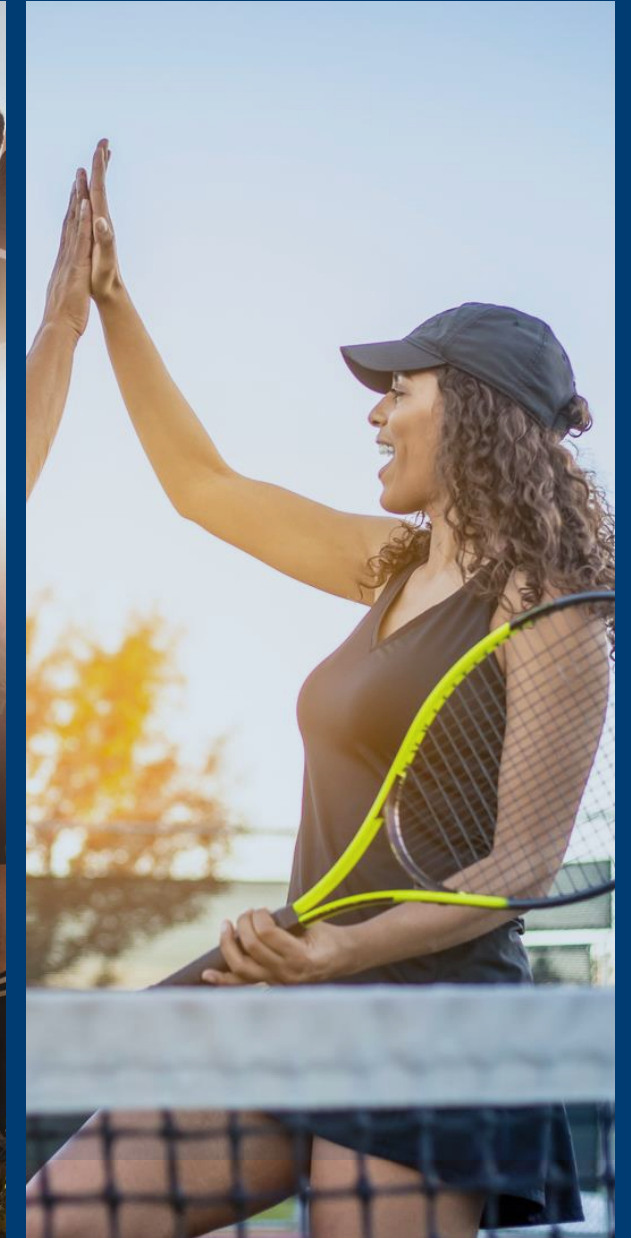
UNITY

Listening to members' needs and speaking with one voice



INTEGRITY

Working towards the interests of the entire industry



TRUST

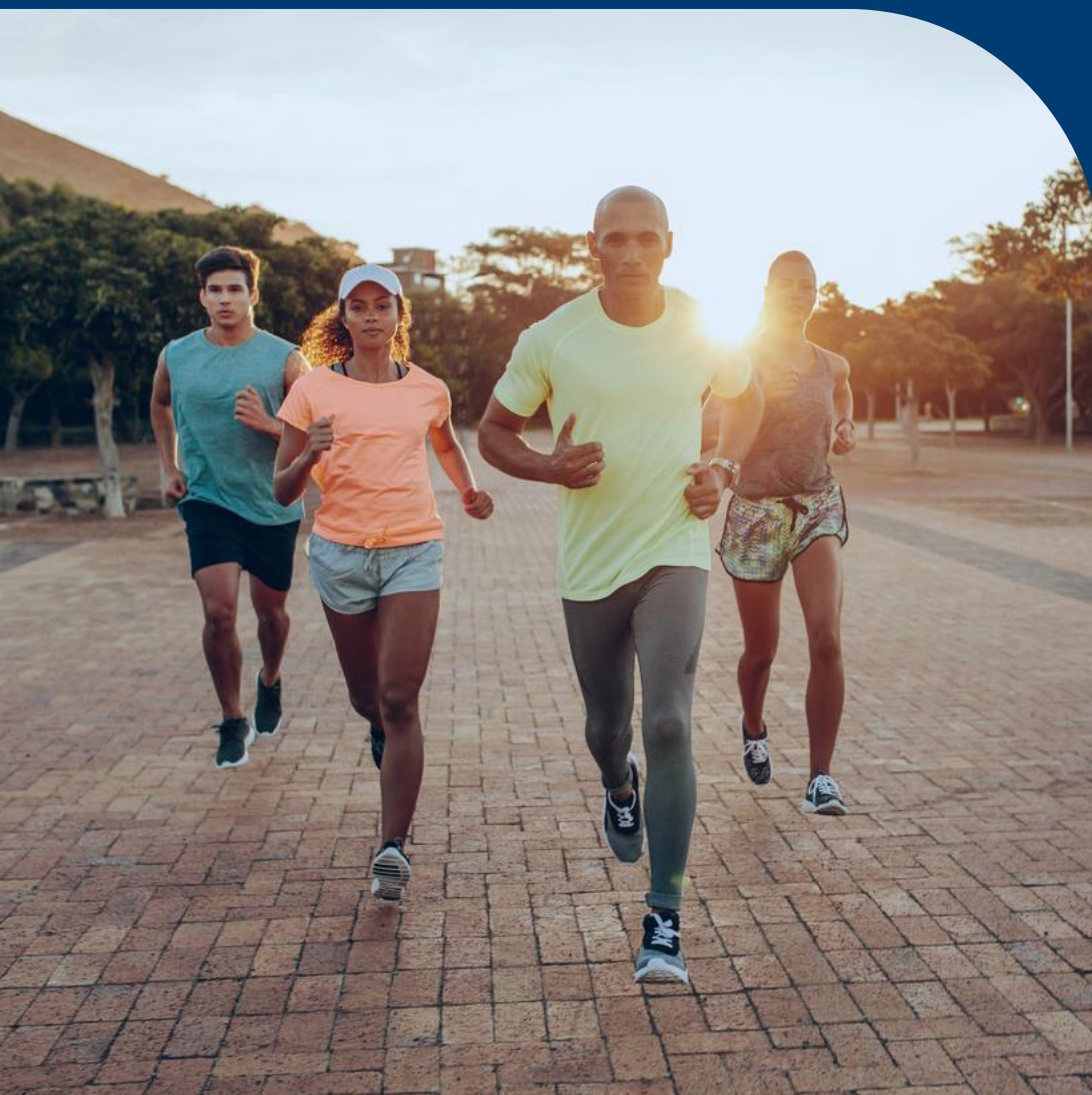
Building credible partnerships between members and EU stakeholders

FESI MISSIONS

01 Inform members

02 Advocate for the industry

03 Profile the sporting goods sector in Europe



FESI MEMBERS



More than **100 brands** and **13 federations**
across Europe



NEW EC POLITICAL GUIDELINES

A new plan for Europe's sustainable prosperity and competitiveness:



Make business easier and deepen our Single Market;



Build a Clean Industrial Deal to decarbonise and bring down energy prices;



Put research and innovation at the heart of our economy;



Boost productivity with digital tech diffusion;



Invest massively in our sustainable competitiveness;



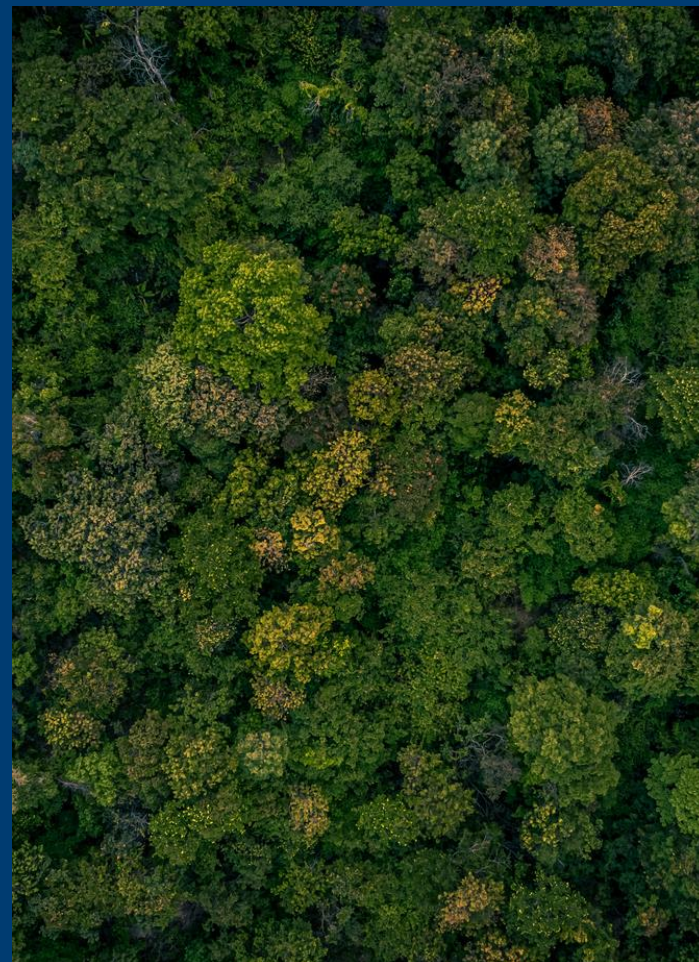
Tackle the skills and labour gap.



Ursula von der Leyen

President of the European Commission

SOME SIGNS OF CHANGE



EU Deforestation
Regulation
POSTPONED



REACH
Revision
REVIEWED



CSRD, Taxonomy and
CSDDD under
assessment for
SIMPLIFICATION



OVERVIEW OF THE KEY UPCOMING EU SUSTAINABILITY POLICIES

EU LEGISLATION IMPACTING YOUR PRODUCTS

1. Corporate reporting

- Corporate Sustainability Due Diligence Directive
- Corporate Sustainability Reporting Directive
- Ban on Forced Labour Regulation

2. Components

- Carbon Border Adjustment Mechanism
- Ecodesign for Sustainable Product Regulation
- Deforestation Regulation

3. Product Performance Information

- Ecodesign for Sustainable Product Regulation

5. End of Life

- ESPR ban on the destruction
- Waste Framework Directive

5. Communication

- Empowering Consumer Directive
- Green Claims Directive

4. Packaging

- Packaging and Packaging Waste Regulation



TRACEABILITY



Planned applicability
2024-2029



Corporate Sustainability Due Diligence Directive



Obligation to prevent negative **human rights and environmental impacts**.

Corporate Sustainability Reporting Directive



Obligation to report companies' impact on the environment, human rights and social standards
ESRS being developed for Sport Equipment

Ban on Forced Labour Regulation



Market removal mechanism which covers **all products** made available on the EU market.

Carbon Border Adjustment Mechanism



Aims to **prevent carbon leakage**, defined as the action of moving carbon-intensive production outside of the EU.

Deforestation and Forest Degradation Regulation



Obligation to prove that the products do not originate from recently deforested areas.

DELAYED 1 year

CBAM: SPECIFIC SCOPE FOR HARD SPORTING GOODS (ex)

Products classified under headings:

- **7326:** other articles of iron or steel
- **7616:** other articles of aluminium such as tent poles, tent pegs, carbiners, keychains
- **7318:** screws bolts, nuts rivets, washers (including spring washers) etc.. of iron or steel



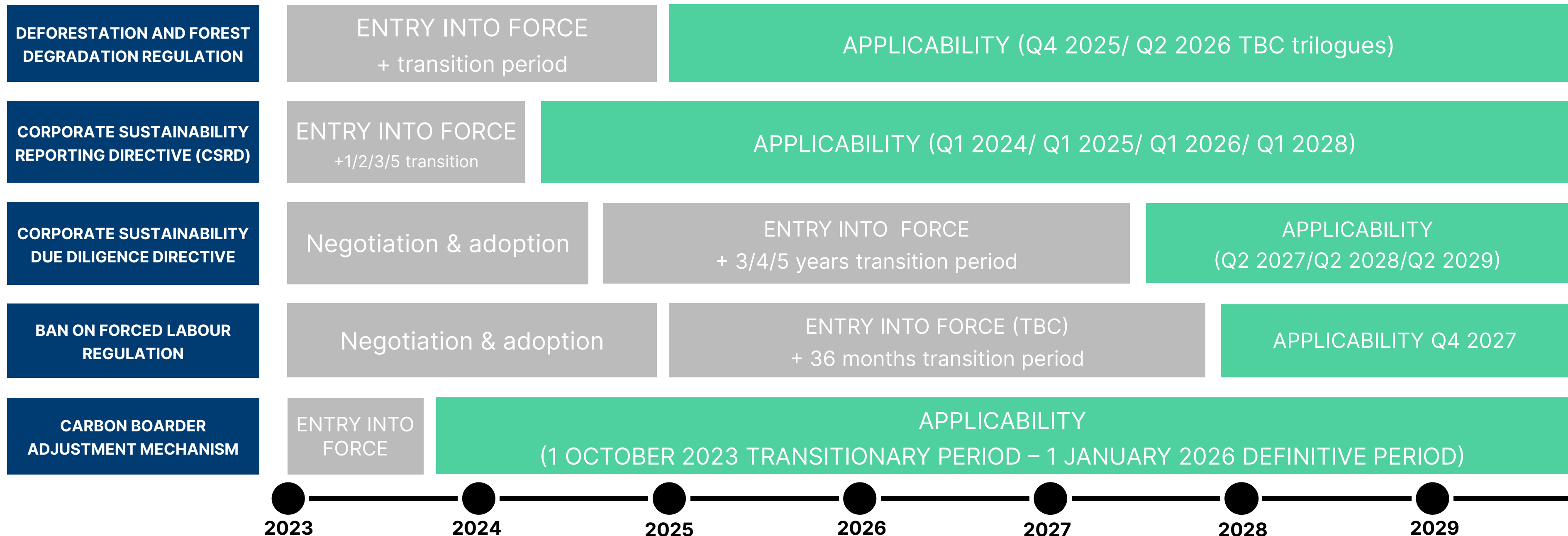
CBAM: PRODUCTS OUT OF SCOPE (ex)



Products classified under headings:

- **7323:** table, kitchen or other household articles and parts thereof of iron or steel, iron or steel wool, pot scourers, and scouring or polishing pads, gloves and the like, of iron or steel such as stainless-steel drinking cup or bottle without vacuum, camping cook set and plates etc...
- **9506:** article and equipment for general physical exercise, gymnastics, athletics, other sports (including table tennis) or outdoor games, not specified or included elsewhere in this chapter, swimming pools and padding pools such as aluminum ski-poles
- **9617:** vacuum flasks and other vacuum vessels, complete, such as vacuum thermal water bottles

INDICATIVE TIMELINE



SUSTAINABLE PRODUCTS



Planned applicability

2024-2027

Ecodesign for Sustainable Products Regulation (ESPR)



Aims to ensure that products are more durable, reusable & repairable with provision of corresponding information.

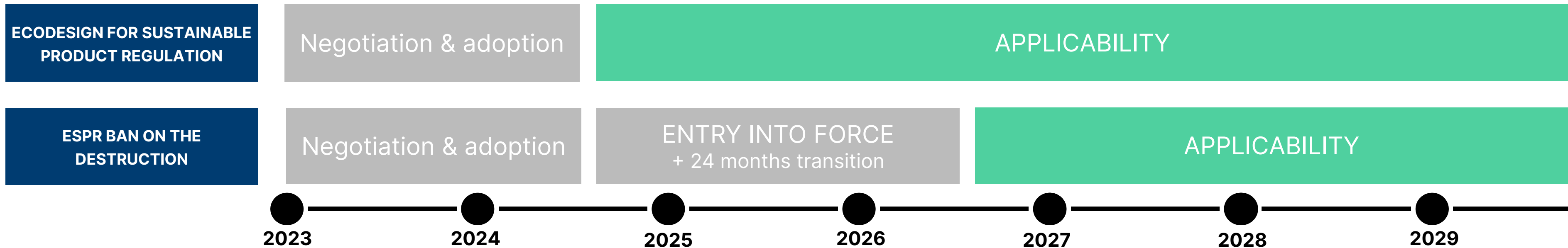
Product specific requirements for:
(1) apparel and accessories, (2) home textiles, (3) footwear

Ban on the destruction (under ESPR)



Ban on the destruction of unsold apparel and footwear products, **including ski boots.**

INDICATIVE TIMELINE



CONSUMER COMMUNICATION



Planned applicability

2026 onward

Empowering Consumers for Green Transition Directive



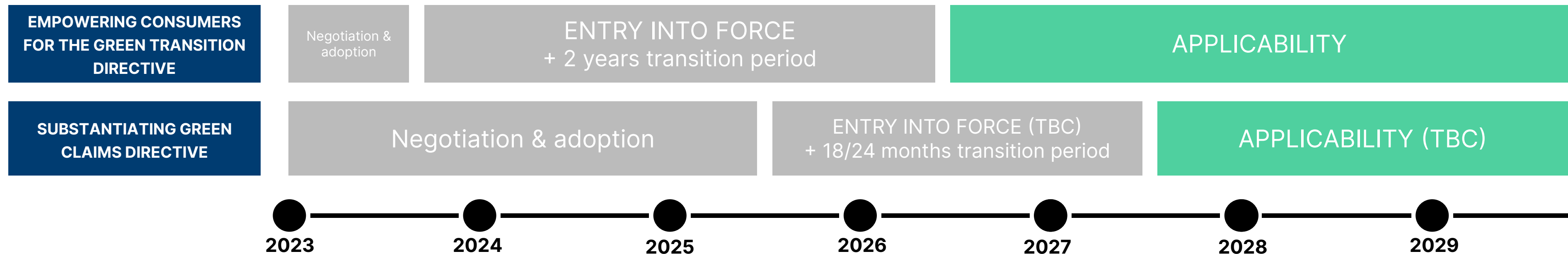
New requirements about what and under what conditions economic operators can **communicate to consumers**.

Substantiating Green Claims Directive



New requirements regarding how voluntary sustainability claims can be **substantiated**.

INDICATIVE TIMELINE



WASTE & END-OF-LIFE



Planned applicability

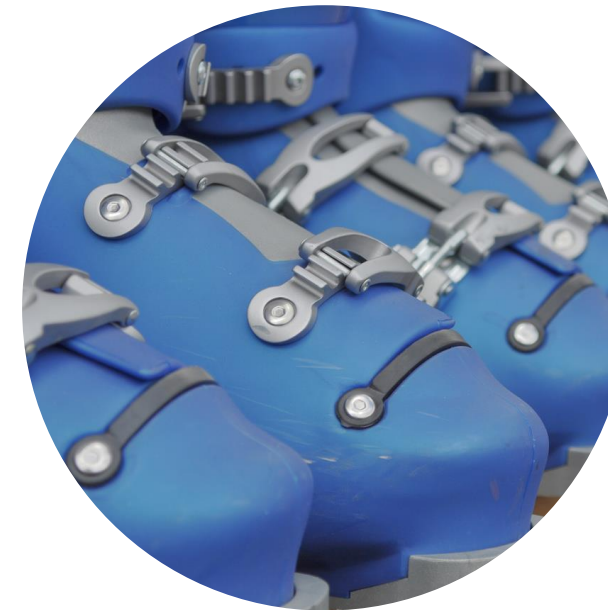
2025-2027

Packaging and Packaging Waste Regulation



Obligation to make **all types of packaging** on the EU market recyclable by 2030.

Waste Framework Directive revision



New rules to make producers responsible for the full lifecycle of textile products.

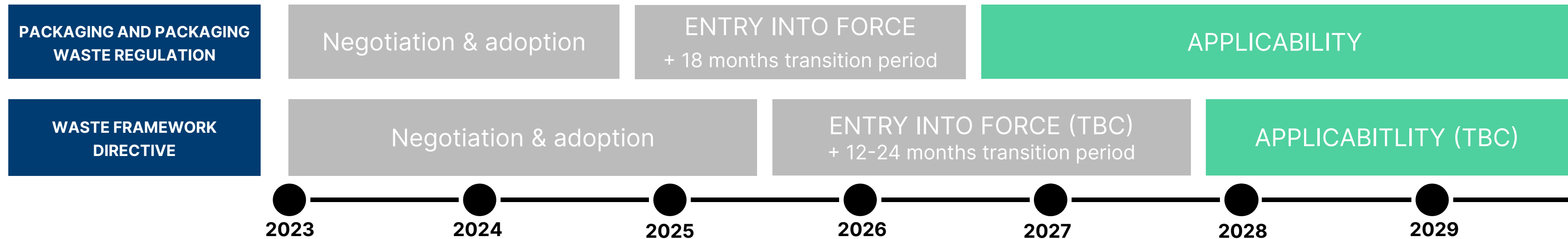
Separate collection of textiles by 1 Jan 2025

Extended Producer Responsibility



National EPR schemes:
France, Italy, Spain, Netherlands, Hungary, Sweden, and others in preparation

INDICATIVE TIMELINE



PFAS RESTRICTIONS

MULTIPLE PARALELL RESTRICTIONS

1. EUROPEAN UNION

- **PFHxA** Published September 2024 + 2 years transition. Applicability October 2026 for clothing / October 2027 for all other products
- **Universal PFAS restriction** Published in Q3 / Q4 2025 + 18 months to 12 years transition depending option and product type (concept of essential use). Applicability starts Q4 2026/2027 at the earliest.

2. FRANCE

- ✓ Applicability Jan 1 2026 for Clothing & Ski wax
- ✓ Applicability Jan 1 2030 for all products (except frying pans)

3. DENMARK

- ✓ Published Jul 1 2025 + 1 year transition
- ✓ Applicability Jul 1 2026 for Clothing and Footwear

PFHxA RESTRICTION

Key Elements

- From *24 months from the date of entry into force of this Regulation* be placed on the market, or used, in a concentration equal to or greater than **25 ppb for the sum of PFHxA and its salts**, or 1000 ppb for the sum of PFHxA-related substances, measured in homogeneous material, in the following:
 - **textiles, leather, furs and hides in clothing and related accessories** for the general public;
 - **footwear** for the general public;
 - **APPLICABLE October 2026**
- Shall not, from *36 months from the date of entry into force of this Regulation* be placed on the market, or used, in a concentration equal to or greater than **25 ppb for the sum of PFHxA and its salts**, or 1000 ppb for the sum of PFHxA-related substances, measured in homogeneous material, in textiles, leather, furs and hides, **other than** in clothing and related accessories referred to in paragraph 1, for the general public.
- **APPLICABLE October 2027**



PFAS RESTRICTION

Concentration limits

- 25 ppb for any PFAS
- 250 ppb for the sum of PFASs (polymeric PFASs excluded from quantification)
- 50 ppm for PFASs (polymeric PFASs included)
- In alignment with previous restrictions on PFAS



PFAS RESTRICTION

DEROGATIONS

All derogations based on the potential for substitution

- Low potential for substitution
- derogation for that specific use
- Overview of available alternatives and justification of derogation for a specific PFAS use can be found in dossier
- Scientific approach to assess the different uses and the viability of alternatives
- Call for evidence –information has been submitted to support the justification

Textiles industry:

1. Derogations for PPE (concept of essential use i.e Oil Platforms workers, army etc)
2. Alternatives are available



PFAS RESTRICTION

OUTLOOK: What should companies do

- RAC and SEAC are evaluating the restriction dossier, focusing on various sectors like cosmetics, textiles, and Ski waxes.
- Final opinions from RAC and SEAC will inform the European Commission's decision on implementing the restriction, expected earliest by 2026 or 2027.
- Industries such as textiles, packaging, and hardgoods need to prepare for potential changes. Companies using PFAS should assess their products and prepare for potential changes in manufacturing and market placement. **EEA report on PFAS impact on circularity (PFAS in ESPR SoC ?)**
- Companies should check value chain for intentional use and unintentional traces.
- **Another consultation phase is expected next year**, providing an opportunity for affected companies to address concerns and ensure legislators consider their input.



PFAS RESTRICTION

SUMMARY OF THE LATEST RAC & SEAC discussions

Textiles, Upholstery, Leather, Apparel, and Carpets (meeting available soon)

- Ongoing discussions; final conclusions reached in November on TULAC and Ski Wax.
- Focus on further evaluation of hazardous chemicals and their use in various textile-related industries.
- Continued discussions to assess potential restrictions on harmful substances in future meetings.

PFAS Emissions:

- RAC agreed to revise how PFAS (Per- and Polyfluoroalkyl Substances) emissions are calculated across different sectors.
 - Emphasis on the waste stage (disposal and incineration) to better understand emissions.
 - Important distinction made between:
 - **PFAS particle emissions** (solid, like fluoropolymer particles).
 - **Leaching PFAS emissions** (non-polymeric PFAS that leach from materials).
 - This differentiation is important due to varying environmental and health concerns between solid particles and leaching PFAS.
-
- Last RAC meeting closed conclusions on TULAC in November (report to be published)**



INDICATIVE TIMELINE



LET'S STAY IN TOUCH

Thank you!

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