Legislations & Certifications
Update for Flame Retardants for Textiles

13th International Conference on Flame Retardants and Fire Behaviour of Textiles and Plastics

Erwin Boënne, Regulatory Affairs & Quality Manager

13/10/2026, Scala Ghent

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CTF 2000 FLAMAWAY GROUP — ZELE - BELGIUM
Texchem FLAMAWAY GROUP — ROCHDALE - UK
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Agenda

A) <u>COMPANY</u> - News '26: Campine x FLY Group!

B) DBDPE "IS" SVHC – Evaluation 1y after predictions:  OR  ?

I) Reach EU: Legal communication obligations

II) Implications on Certifications & Market needs: Oeko-Tex (ACP, Std 100, STeP), IMDS (GADSL), ZDHC, …

III) News '26: Will DBDPE become a UN Persistent Organic Pollutant?

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D) REACH legislation close to EU – Where are we now?

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II) UK Reach (UK, after Brexit) compliancy for FR formulations

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F) <u>CONCLUSIONS</u>

CTF2000 NV Belgium -
member of Flamaway Group

- Development & production of Flame Retardant formulations for textile industry
- Distribution of antimicrobial products and oil-and water repellent products
- ISO9001:2015 & ISO14001:2015 certified, recently (August 2026) recertified 3y
- Member of Essenscia, Brussels since 2007; Member of Pinfa (Cefic), Brussels since 2016
- Close relationship with BSEF, Oeko-Tex Zürich, Centexbel, ZDHC Zürich,…
- Global sales: EU, UK, Turkey, Asia, South-America, Australia,…
- In EU: 1 of the 6 main suppliers
- Flamaway Group has also entities in UK (Texchem UK Ltd), Germany and China
- Sep' 26 News:











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ISO 9001
ISO 14001
BUREAU VERITAS
Certification

Customers and Markets



- Home & Contract Textiles (1. upholstery; 2. bedding – mattress ticking,…; 3. decoration – window, ceiling,…)
- Construction & Outdoor (building & construction, tenting,…)
- Transportation (automotive, aviation,…)
- Apparel (PPE, Military,…)







flamaway®
a registered trademark of CTF2000

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Campine

Recover.
Renew.
Repeat.

Circular METALS

Largest independent **lead**-acid battery recycler in Europe.
Recycling of Pb, Sb, Sn, Ag, Au

Specialty CHEMICALS

Largest ATO producer in the world serving the **FR**, PET and other specialty markets.

6+3

recycling &
manufacturing
locations



Campine & Flamaway

A stronger flame-retardant platform for technical textiles

Campine brings industrial scale, global sourcing strength and a leading position in antimony trioxide for flame & fire retardants.

Flamaway adds a deep textile-focused flame-retardant know-how, strong customer service focus and entrepreneurial speed.

Together we combine complementary products, stronger supply security and broader technical support for customers.

Flamaway keeps its identity and technical agility — now backed by Campine's industrial platform.

Technical textiles | ATO & FR specialties | Supply resilience | International growth

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Campine

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DBDPE "IS" SVHC (vPvB)

Evaluation 1y - Legal communication obligations

- At the last year's 22/10/2025 12th International Congres, we *predicted* a Nov. '25 SVHC listing! It *happened* less than 1 month later, on 05/11/2025. DBDPE is [BrFR].
- CTF2000 NV had prepared in advance a thorough letter '2025-11-05 DBDPE on SVHC list' for its customers, with the supply chain implications (legal and market needs); Beneath summarised what was in last year's presentation and the letter:

1) DBDPE and/or DBDPE containing formulations can still be placed on the market in the European Economic Area (EEA = EU + Iceland, Liechtenstein and Norway)

2) Legal communication obligations in the supply chain following SVHC listing:

	Actor	Obligation
Step 1	Formulator (eg CTF2000)	SDS update (especially section 3, mentioning DBDPE, from … till … %)
Step 2	Customer CTF2000	For articles containg DBDPE > 0,1% w/w DBDPE, min. the **name** has to be communicated; https://echa.europa.eu/regulations/reach/candidate-list-substances-in-articles/communication-in-the-supply-chain (fyi)
Step 3	Customer CTF2000	SCIP obligation - Questions were forwarded to Centexbel / Fedustria; https://echa.europa.eu/scip (fyi)
Note	Notification of DBDPE for our customers is not necessary, following the exemption on ECHA website – Exemption: the substance has already been registered by a manufacturer or importer in the EU for that use.	

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Market certification 1: Oeko-Tex

Oeko-Tex List of Accepted Chemical Products

- OEKO-TEX® STANDARD 100

*one of the world's best-known labels for textiles tested for harmful substances (in principle, for all textile articles in every stage of processing)

*The OEKO-TEX® laboratory tests include more than 100 test parameters and take into account the intended use of the textiles. The more intensive the *skin contact* of a textile product, the stricter the limit values for each product class.

Product class I: Articles for babies and toddlers (eg underwear, bed linen, socks,…)
Product class II: Articles used close to (direct contact with) the skin (eg underwear, bed linen, socks…)
Product class III: Articles used away from (no direct contact with) the skin (eg jackets, coats,…)
Product class IV: (Decoration) Materials (eg upholstery, curtain, tablecloth,…) → Note: Because of the use of ATO (Sb_2O_3) as synergist for halogenated FR's, [BrFR/Sb_2O_3] formulations are limited to class IV [(only) class IV has no limit of Sb as extractable heavy metal]

- General philosophy = FR (formulations) not allowed for STANDARD 100, unless listed on the Oeko-Tex 'List of Accepted Products'; See: https://www.oeko-tex.com/en/apply-here/active-chemical-products

- To achieve a class level for STANDARD 100, you need an FR formulation of minimum the same class

Implications DBDPE as SVHC?
ACP, STANDARD 100 and STeP

- The DBDPE-listing soon was followed by an inclusion of DBDPE in the Oeko-Tex RSL (added 01/03/'26, enforced 01/06/'26), which means DBDPE max. is allowed for 0.1% (w/w).

[FR] Formulation	Listed products < 01/06/2026 Flamaway	Class	Listed products > 01/06/2026 Flamaway
[DBDPE]-Formulation	11 (33 %)	IV (Contains Sb)	0 (Deleted from list !!)
[Pol Br]-Formulation	0 (0%)	IV (Contains Sb)	4 (14%) (↑ High Potential)
[PIN-FR]-Formulation	22 (67 %)	IV I-IV	25 (86%) (↑ High Potential)



- STANDARD 100 certificates containing DBDPE remain valid from 01/06/2026 until they have to be renewed (so a max. of 1 year transition time, latest around May 2027).



- STeP Annex 3 Edition 02.2025 of 15/09/2025 did not mention DBDPE (MRSL related to wastewater & sludge), this is of course before the SVHC listing of 05/11/2025…, but
- STeP – we can certainly expect any new update of Annex 3 will mention DBDPE !!



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Market need 2: IMDS (Automotive)

Making use of GADSL – DBDPE (& ATO) both are "D"eclarable

- IMDS – International Material Data System (see https://www.mdsystem.com/imdsnt/startpage/index.jsp)
- In IMDS, all materials used for automobile manufacturing are collected, maintained, analysed and archived. Using the IMDS, it is possible to meet the obligations placed on automobile manufacturers, and thus on their suppliers, by national and international standards, laws and regulations. Companies (like CTF2000) can have their own login to add information in IMDS.
- Chemicals used for automotive (like Flame Retardant Formulations) are communicated with their chemical composition in the automotive supply chain by IMDS.
- GADSL – the Global Automotive Declaration Substances List (see https://www.gadsl.org/, revised 01/09/2026) is used within IMDS. The GADSL list (≠ Blacklist) uses two main classifications to identify the regulatory status of a chemical: "D"(eclarable) and "P"(rohibited)
- DBDPE (& ATO = Sb2O3) have classification "D"(eclarable) (01/09/2026 revised GADSL)

NEWS

09/09/2026 GADSL Update September 2026

On September 11, 2026 the GADSL List will be updated in IMDS.

Further information is available in IMDS News.

Substance	CAS RN	Classification
1,1'-(ethane-1,2-diyl)bis[pentabromobenzene]	84852-53-9	D

PLEASE NOTE: Not all substances on the GADSL are prohibited from automotive use. Substances listed are or could be potentially regulated but are not necessarily candidates for substitution. GADSL is intended to communicate the use of these substances in the automotive industry to support government regulations and requests as well as providing guidance on substance restrictions. Please do not refer to GADSL as a "blacklist" or a "ban list."

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Market certification 3: ZDHC

No compliancy possible with halogenated FR's (DBDPE or others)

- ZDHC – Roadmap to Zero programme: paving the way for sustainable chemicals management within the apparel / fashion / textile industry (worldwide initiative of > 160 stakeholders, started in 2011), see https://www.roadmaptozero.com/
- ZDHC – MRSL Manufacturing Restricted Substances List (currently version 3.1; in coming months 4.0); lists eg Halogenated FR's (both [BrFR] & [ClFR]), Sb, PFAS,… → Not allowed!

*Formulation Limit MRSL (eg CTF2000) - These limits ban intentional use while allowing for reasonable expected manufacturing impurities.

*Supplier Guidance MRSL (Customers CTF2000) - No intentional use in facilities that process raw materials and manufacture finished products.

[FR] Formulation	CTF2 ZDHC formulations	Limitation
[BrFR]-Formulation [ClFR]-Formulation	0	ZDHC MRSL … Halogenated Flame Retardants 'NOT ALLOWED in ZDHC (MRSL)'
[PIN-FR]-Formulation	13 (100 %)	/

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Market certification 3: ZDHC

Eco-PassPort as a means to achieve ZDHC compliancy

- ZDHC: There are (as formulator) different ways to achieve ZDHC-compliancy (eg Bluesign, tests @ lab, Oeko-Tex Eco-PP,…).
- 

CTF2000 NV has chosen for Eco-PassPort, because it is part of a (well known) Oeko-Tex system @ CTF2000 NV. The Eco-PassPort has to be renewed yearly @ Centexbel → yearly update Eco-PP on the ZDHC Gateway (a supply chain platform). ChemCheck Reports can be downloaded from the ZDHC Gateway.
- Eco-Passport of Centexbel will be (again) renewed before October 31, and will be updated on the ZDHC Gateway in the coming days.
- 

CTF2000 NV has achieved since October 2024 the highest level for ZDHC, which is ZDHC Level 3. Audit done by Centexbel.
- Note: GRS (Global Recycled Standard 5.0), section D (chemical requirements): "GRS compliant chemical = Reach (SVHC) OK + Table A (H sentences) OK + ZDHC MRSL OK"; So 'Halogenated FR's not allowed for GRS'

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News 2026: DBDPE as UN POP?

It certainly is possible!

- https://chm.pops.int/TheConvention/ThePOPs/AllPOPs/tabid/2509/Default.aspx
- Global UN Persistent Organic Pollutants – Stockholm Convention is a legally binding international treaty for the countries that have officially joined
- Several [BrFR's] are already listed, eg HBCD, Deca-BDE,… (as 'Industrial Chemicals', next to eg 'Pesticides'…)
- 21-25 September 2026: POPRC-22 (22nd meeting of the POP Review Committee) – continued discussion, from scientific point of view eg many Industry members agree with 'P', but not with 'B',… agreed to develop risk profiles for consideration at next meeting… to be continued in future COP (Conference of the Parties) meetings (COP-13 in 2027)
- The process takes a long time – can minimum take up to 5 years before DBDPE is listed UN POP (after ratification by EU, earliest decision expected in COP in 2029)
- Note: A listing under the UN Persistent Organic Pollutants (POPs) via the Stockholm Convention legally obligates participating countries to restrict, eliminate, or reduce the production, use, import, export, and release of that chemical.



- A UN POP listing of DBDPE would thus have a legal more global impact (not only at EU level) in the long term future !

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ECHA's activities on Restrictions

Current: [ABFR's] and [OPFR's]



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- See: https://echa.europa.eu/current-activities-on-restrictions
- ECHA Mandate November 2025, "1" and "2" (Note: following ECHA 2023 FR Strategy)
- 1: Certain non-polymeric, additive [ABFR's], including DBDPE - preparing Annex XV restriction dossier – (< due to PBT or vPvB properties)
- 2: [OPFR's] - prepare an investigation report to avoid regrettable substitution (Part 1, Dec '26 < as several [OPFR's] appear to exhibit properties that make them hazardous to HH or ENV) & to provide further info (Part 2, Dec '27 < Hazard & Risk & Uses)

Substance Name	EC number	CAS number	Type of the task	Scope of the task	Entry in Annex XVII	Other remarks
Certain non-polymeric aromatic brominated flame retardants	-	-	Prepare an Annex XV restriction dossier	Restricting the placing on the market of electrical and electronic equipment (EEE), construction products and textile products containing certain non-polymeric aromatic brominated flame retardants.		Commission's request to ECHA [PDF] [EN]
Organophosphorus flame retardants and potential alternatives to certain aromatic brominated flame retardants	-	-	Prepare an investigation report	Report 1 should describe the possible implications of substituting non-polymeric aromatic brominated flame retardants with alternative flame retardants (due by December 2026). Report 2 should be a comprehensive review of all organophosphorus flame retardants across applications (due by December 2027).		Commission's request to ECHA [PDF] [EN]

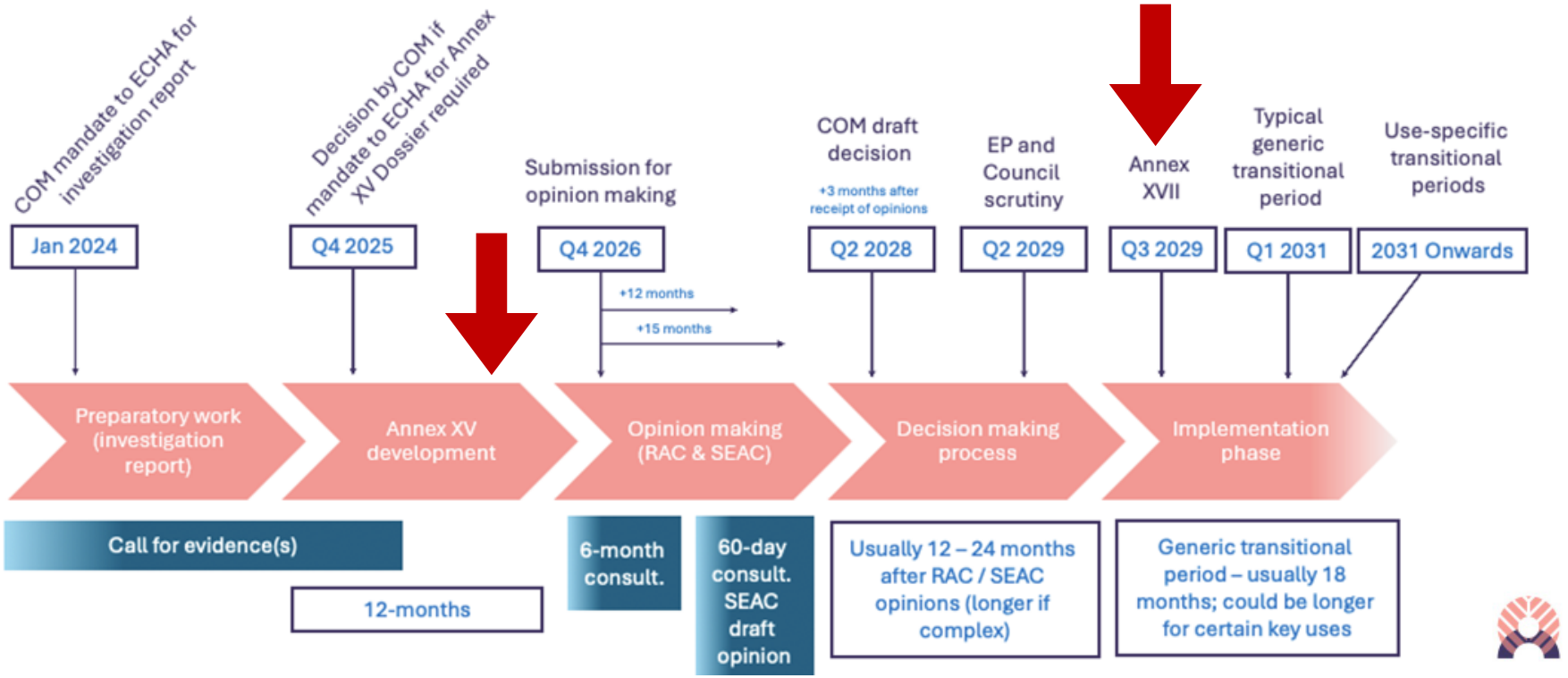
ECHA's activities on Restrictions

Current: INDICATIVE Restriction Timeline for non-polymeric additive [ABFR's]

- Call for Evidence input (also) of CTF2000 in this process 16/03/2026, and Teams meeting shortly afterwards between CTF2000 and ECHA for follow up questions.



- Any DBDPE restriction (Annex XVII) unlikely before Q3 2029, and exemptions or longer timelines are possible for certain applications!



Note: Indicative (potential/estimated) Restriction Timeline beneath provided by Apeiron

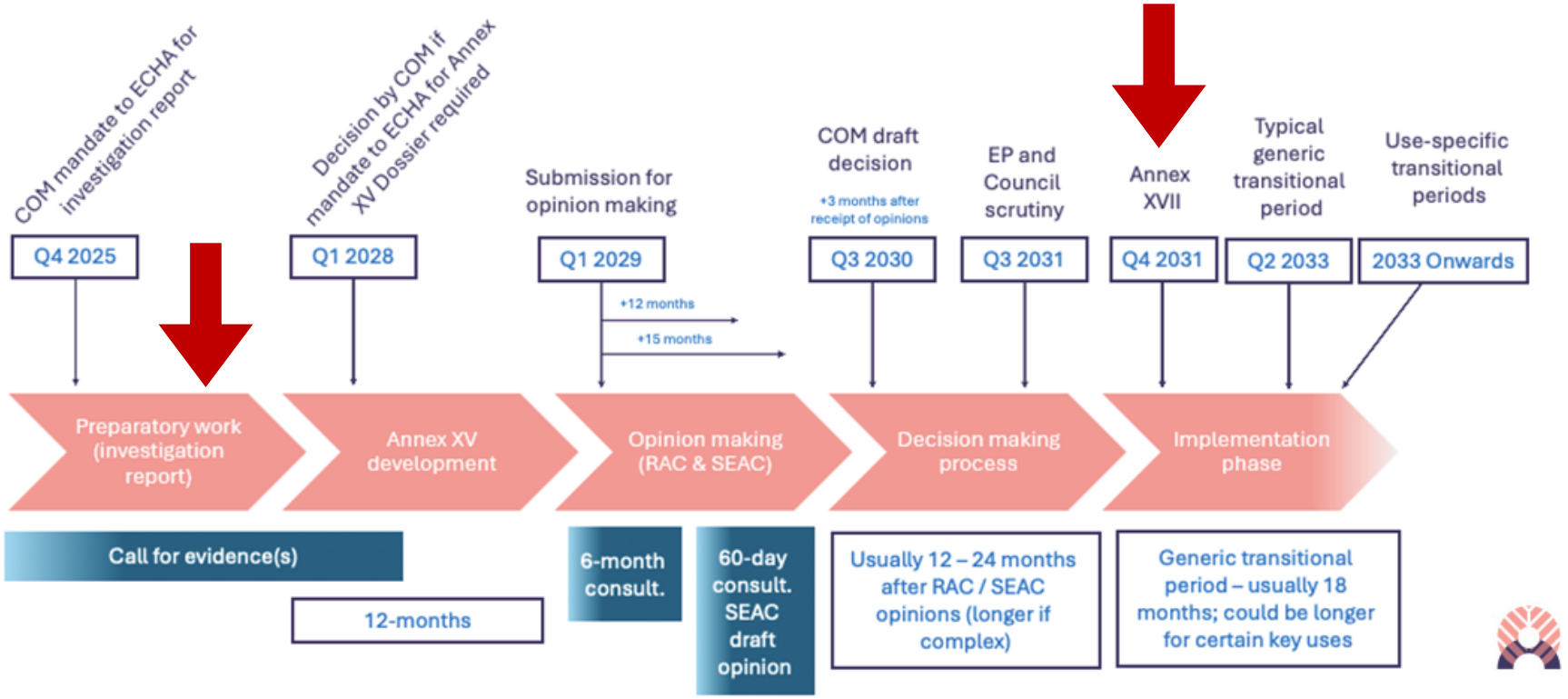
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ECHA's activities on Restrictions

Current: INDICATIVE Restriction Timeline for [OPFR's]



- Any [OPFR] restriction (Annex XVII) unlikely before Q4 2031, and exemptions or longer timelines are possible for certain applications!
- Currently, many uncertainties remain… to be continued Dec '26…



Note: Indicative (potential/estimated) Restriction Timeline beneath provided by Apeiron

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Experiences with Reach Inspections

Announced EU Reach inspections in 2015, 2019 and 2025

- Reach is an EU legislation, but inspection is organised by the Member States (Belgium)
- CTF2000 NV is member of Essenscia, and has been VLARIP member for Reach compliancy implementation many years



- CTF2000 NV has had Reach (& CLP) inspections in 2015, 2019 and 2025
- Inspection 2015: articles 5, 6, 8, 31 en 32 (Registration obligations, OR, SDS & communication)
- Inspection 2019: articles 5, 6 and focus on compliancy of import of chemicals
- Inspection 2025: similar, but also focus on CLP and Antipoison



- Conclusion: All 3 Reach inspections at CTF2000 NV were OK without any negative consequence or action. No non-compliancy or pending issues.

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Import → EU Reach Registration !

Beware in case you import chemicals from outside EU !

- Each EU company that imports chemicals in EU, has to prove EU Reach registration compliancy ! Beware eg of chemicals coming from UK and/or Turkey for compliancy !



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Reach Inspections < Essenscia info

Possible penalties in case of non-compliancy?



					Remarks
Federal Public Service Health, Food Chain Safety and Environment	**Serious offense** Fine: 160 euro up to 4.000.000 euro	**Serious offense** Imprisonment: 8 days to 3 years	**Less serious offense** Fine: 52 euro up to 120.000 euro	**Less serious offense** Imprisonment: 8 days to 1 year	- a judge will decree penalties within the limits shown in present table - if no criminal prosecution ➔ administrative fine can be imposed - to obtain values for effective fines: multiply values shown in table by +/- 5.5
Federal Public Service Employment, Labour and Social Dialogue	(the same as for Federal Public Service Health, Food Chain Safety and Environment)				- preparation of establishment of penalties ongoing - Law on product standards changed 27/07/2011 BOJ 19/8/2011
Flemish Government	Fine: 100 euro to 250.000 euro Imprisonment: 8 days to 3 years				- a judge will decree penalties within the limits shown in present table - if no criminal prosecution OR in case less serious offense➔ administrative fine can be imposed - to obtain values for effective fines: multiply values shown in table by +/- 5.5
Brussels Capital Region	**Serious offense** Fine: 10.000 euro up to 500.000 euro	**Serious offense** Imprisonment: 1 month to 2 years	**Less serious offense** Fine: 100 euro up to 100.000 euro	**Less serious offense** Imprisonment: 8 days to 6 months	- a judge will decree penalties within the limits shown in present table - if no criminal prosecution ➔ administrative fine (62,50 euro to 62.500 euro) can be imposed
Region of Wallonia	**Serious offense** Fine: 100 euro up to 1.000.000 euro	**Serious offense** Imprisonment: 8 days to 3 years	**Less serious offense** Fine: 100 euro up to 100.000 euro	**Less serious offense** Imprisonment: 8 days to 6 months	- a judge will decree penalties within the limits shown in present table - if no criminal prosecution ➔ ???

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KKDIK, following Customs Union

Reach legislation close to EU

- https://www.turkreach.com.tr/; Official Gazette No 30105 of 23/06/2017



- There are no customs tariffs for chemical products traded between the EU and Turkey because they are covered by the EU-Turkey Customs Union (1995). This Union and broader EU harmonization policies are a major driving force behind KKDIK's creation.
- Same Reach terms: Pre-registration, LR, Data sharing, SIEF, Consortium, LoA,…
- Similar as Reach: Applies to chemicals manufactured or imported in quantities >= 1t/y; Non-Turkish manufacturers appoint an OR; …
- The authority: Turkish Ministry of Env, Urbanization and Climate Change (MoEUCC)



- FR formulations for Turkish market need to be compliant.
- NEWS: On 04/03/2026, the Ministry published an announcement regarding the registration procedures of KKDIK: After 30/09/2026, companies need to ensure the circulation of their substances using the assigned "Registration (Individual Provisional, Member Provisional or full) Number". A limited data set is needed to comply. Provisional registration acts as an "entry ticket", allowing continued market access until joint registration is completed and full dossiers are submitted within deadlines. This is described as a "cost-conscious mandatory interim compliance step".

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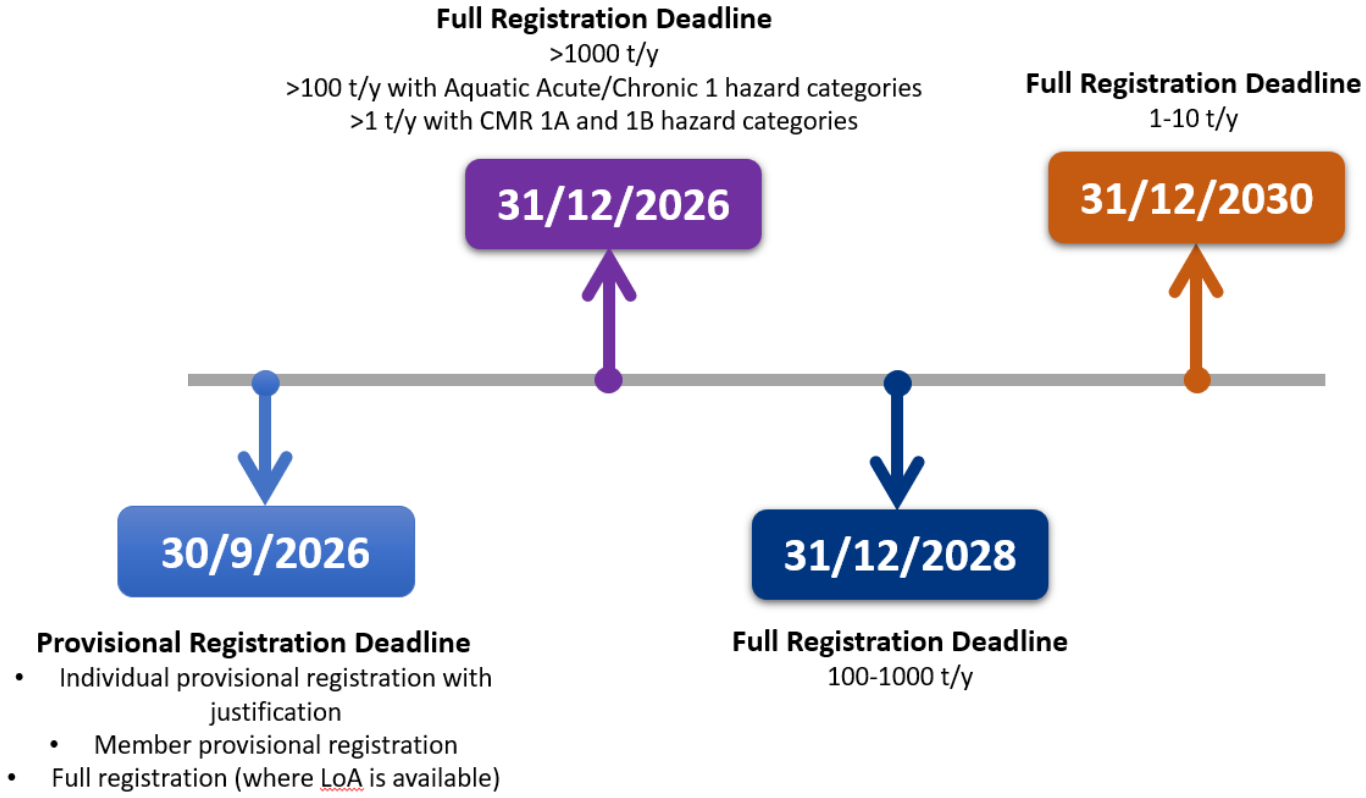


KKDIK, compliancy scheme

Reach legislation close to EU



- How to deal with KKDIK? General scheme, with 'Provisional Registration Deadline', and the different 'Full Registration Deadlines'. *Note: At least 2 years extension expected for the current Full Registration Deadlines (so 31/12/20~~26~~28, 31/12/20~~28~~30, 31/12/20~~30~~32).*



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KKDIK – CTF2000 compliancy?

Reach legislation close to EU

- CTF2000 (Flamaway) Compliancy – How?
- Flamaway Group has an OR (RGS), located in Instanbul and Brussels.
- RGS has fulfilled Pre-registration and the 30/09 Provisional Registration Deadline, in close collaboration with CTF2000 NV.
- Notes *The Ministry is expected to clarify how provisional registrations will be integrated into the joint registration process after 30/09/2026.

*Controls will begin at customs based on the registration numbers by the beginning of 2027. Substances without a valid registration number will not be allowed to be placed on the Turkish market.

*About preregistration: Registrations (either full or provisional) cannot be submitted without a pre-registration, so provisional registration does not replace the pre-registration requirement. Substances already on the market should have been pre-registered by 31 October 2025. Pre-registrations are still required for substances placed on the market for the first time and must be submitted within 30 days of their introduction to the Turkish market.

*Turkish SVHC? Foreseen (similar as EU Reach), but no publication yet.

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UK Reach, following Brexit

Reach legislation close to EU

- https://www.hse.gov.uk/reach/about.htm
- Under the EU (Withdrawal) Act 2018, the EU Reach Regulation was brought into UK Law on 01 January 2021 and is known as UK Reach.



- The key principles of the EU Reach Regulation were retained in UK Reach.
- UK Reach and EU Reach regulations operate independently from each other. Where necessary, you must ensure you comply with both regulations.
- UK Reach regulates chemicals placed on the market in GB.
- Under the terms of the Northern Ireland Protocol, EU Reach continues to apply in Northern Ireland.



- FR formulations for GB market need to be compliant.

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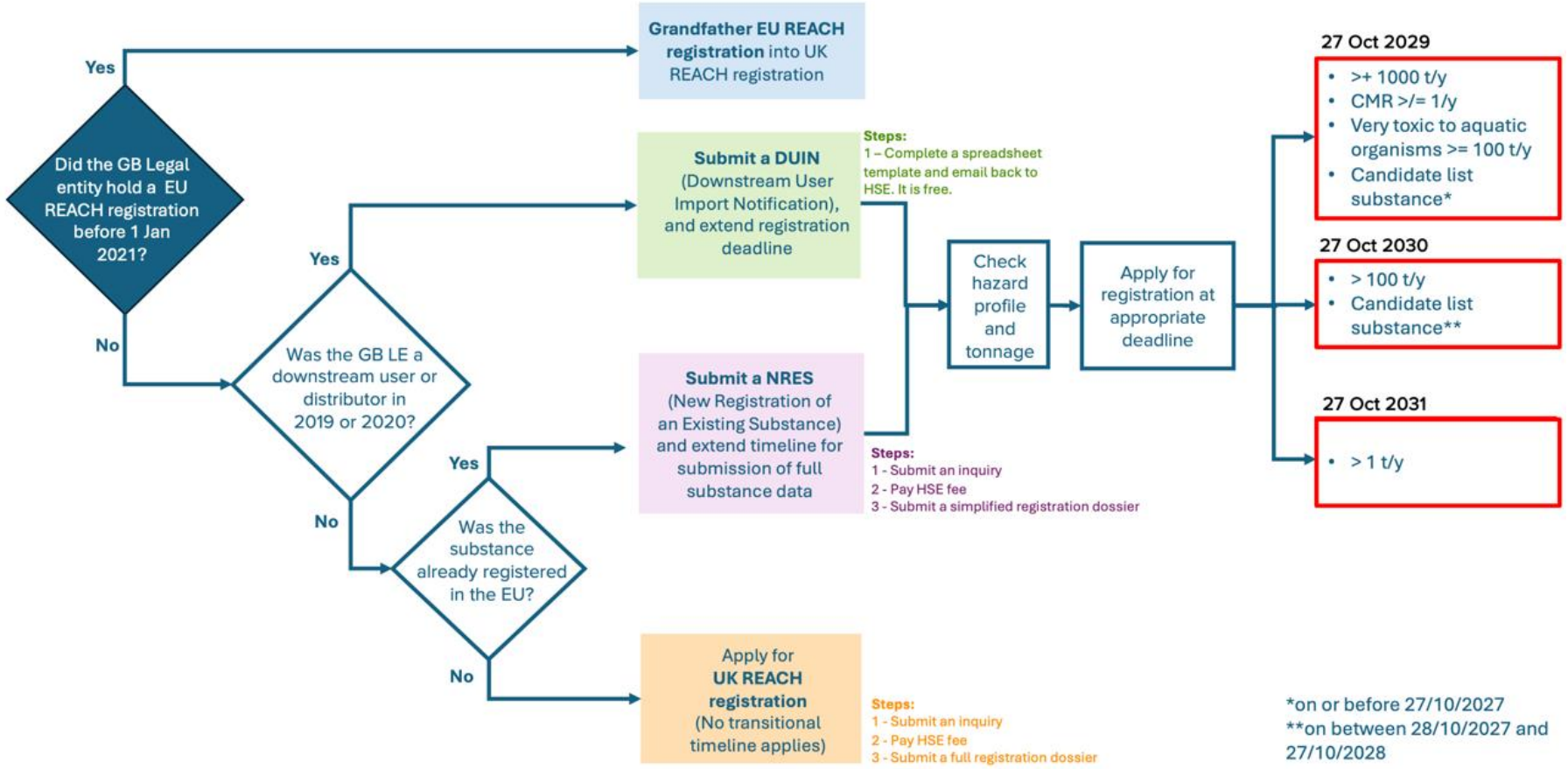


UK Reach, compliancy scheme

Reach legislation close to EU



- How to deal with UK Reach compliancy? General scheme, with 'Grandfathering', 'DUIN', 'NRES' and UK Reach registration deadlines.



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UK Reach – CTF2000 compliancy?

Reach legislation close to EU

- CTF2000 (Flamaway) Compliancy – How?
- Flamaway Group has a chemical plant in UK (Texchem UK Ltd), that acts as both importer (for distribution of CTF2000 products in UK) and Only Representative.
- Texchem UK Ltd had fulfilled DUIN (Downstream User Import Notification) for the substances needed for UK market December 2021, in close collaboration with CTF2000 NV.
- UK Reach deadlines currently set for 2029, 2030 and 2031
- Submitting a NRES (New Registration for an Existing Substance) is still possible (also CTF2000 will double check this before 31/12)
- Note: For a long time (since 25/06/2020), the UK SVHC list wasn't updated. Only recently, there was an update on 15/06/2026. DBDPE not SVHC for UK Reach.

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BSEF

BSEF represents global [BrFR] Industry

- www.bsef.com - Bromine Science and Environmental Forum, known from VECAP in the past; *Note: Though the Vecap protocol (see www.vecap.info) to control emissions currently is still valid, the Vecap programme has been discontinued over a decade ago.*



- BSEF and its members are deeply involved in evolution of [BrFR] possible restrictions, eg tried to avoid SVHC status of DBDPE based on scientific evidence.
- BSEF members, see https://www.bsef.com/about-us/about-bsef/ (eg Albemarle, ICL, Lanxess,…)
- Source: 2030 Flame Retardant Industry Outlook (< Albemarle) - Some quotes:



- *"…The shift from additive [BrFR's] (eg DBDPE) to Polymeric [BrFR's] is no longer a 'maybe' – it is a 'must'… The interest in testing Polymeric [BrFR's] has never been higher…"*



- *"…Regulators (ECHA) optimistic about Polymeric [BrFR's]: … Polymeric ABFR's seem to be a viable alternative to non-polymeric ABFR's… & … Due to their larger size, they are less likely to migrate out of the material compared to non-polymeric additives unless they are subject to degradation…"*

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pinfa
Phosphorus, Inorganic & Nitrogen Flame Retardants Association

Pinfa (Note: info docs available (member)!)
Pinfa represents EU's & global [PIN-FR] Industry

- www.pinfa.eu – Phosphorus, Inorganic & Nitrogen FR Association, a sector group of Cefic, acts worldwide with sister associations, pinfa NA and pinfa China



- Pinfa and its members are deeply involved in regulatory developments, eg in the ECHA current activity on (possible) restrictions [OPFR's] and/or others



- CTF2000 (FLY Group) also has experienced added value of [PIN-FR's] compared to Br/Sb formulations in certification like Oeko-Tex (ACP Class I, STeP), ZDHC (Eco-PP) and GRS…
- (EU) full members, manufacturing [PIN-FR's], https://www.pinfa.eu/about-us/members-membership/
- (EU) associate members, incl. DU of [PIN-FR's], eg CTF2000 (FLY Group)



- Shift from DBDPE to alternatives include of course (partly) commercially available [PIN-FR's]
- R&D worldwide ongoing towards Bio-based FR's, with P & N added → we expect to become widely commercially available in the long term (5-10y). An example of long term DBDPE substitution project is the FONT (low TRL1-3 level) R&D project (SSbD framework). FONT was funded by the EU and included 4 partners: Apeiron, Centexbel, KU Leuven and CTF2000. The FONT project was mentioned in Pinfa Newsletter April 2026 https://www.pinfa.eu/news/replacing-harmful-flame-retardants/

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HEFESTOS

Both BSEF & Pinfa are involved associations

- Objective = Accelerate Safer chemical Innovations
- Textiles are included in the 'Other sectors'
- Timeline: 12/'25 – 10/'27 (Aimplas kick-off 25/06/'26)

Creation of a **pilot cooperation group** involving stakeholders from the construction, automotive, and cable sectors to jointly map the value chain and identify critical points related to the **substitution of BFRs**.

Within a framework of safe and **non-competitive collaboration**, where each stakeholder shares their technical and operational perspective to build a common diagnosis based on real evidence.

HEFESTOS

Hub for European Flame-retardants Evaluation, Substitution and Transition Operations for Sustainability

Identification of **technical, economic, regulatory, and logistical bottlenecks** throughout the entire value chain, as well as potential alternatives where they exist and are feasible

Involving all actors across the value chain, including **industry, associations, research centres, and regulators**, towards a more sustainable future while strengthening the competitiveness of the European economy.

- As CTF2000 is Pinfa member, we'll be further informed
- Campine involved for Recycling

Key FR Applications in other Sectors



Contact AIMPLAS: hefestos@aimplas.es

Contact EC: GROW-F1@ec.europa.eu

European Commission | AIMPLAS

The network of Hub(s) will operate through:

- **Central EU Hub (meta-hub function)** — coordinates the network & thematic nodes on EU-wide priorities
- **National/Regional Hubs** — provide local support and practical implementation
- **Independent contributing organisations** — voluntary experts (RTOs, universities, NGOs)

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Agenda

A) <u>COMPANY</u> - News '26: Campine x FLY Group!

B) DBDPE "IS" SVHC – Evaluation 1y after predictions:  OR  ?

I) Reach EU: Legal communication obligations

II) Implications on Certifications & Market needs: Oeko-Tex (ACP, Std 100, STeP), IMDS (GADSL), ZDHC, …

III) News '26: Will DBDPE become a UN Persistent Organic Pollutant?

C) REACH EU

I) ECHA's (preparing) activities on future restrictions of FR's

II) Reach inspections: Experiences & Possible penalties

D) REACH legislation close to EU – Where are we now?

I) KKDIK (Turkey) compliancy for FR formulations

II) UK Reach (UK, after Brexit) compliancy for FR formulations

E) EU & Global Chemical industry FR organisations/federations

I) BSEF represents (EU & Global) [BrFR's]

II) Pinfa represents (EU & Global) [PIN-FR's]

F) <u>CONCLUSIONS</u>

CTF2000
Flame Retardant Chemicals & Textile Specialties

ISO 9001
ISO 14001
BUREAU VERITAS
Certification

Conclusion

- DBDPE has become an EU SVHC on 05/11/2025 *(as predicted)*, and we have experienced the implications for the supply chain *(as predicted)*. DBDPE is no SVHC (yet) in KKDIK (Turkey) or UK Reach! DBDPE remains "D"eclarable according to GADSL (IMDS). Halogenated FR's are – unfortunately – not allowed in ZDHC (or GRS). For ZDHC, CTF2000 makes use of Eco-PP (Level 3).
- DBDPE formulations no longer usable for recertification OEKO-TEX® STANDARD 100, and DBDPE is expected to become UN POP, but not within 5 years.
- ECHA's (preparing) activities on (possible) future restrictions of FR's – following the ECHA FR Strategy 2023 – are ongoing, but any Annex XVII resulting from this process is not expected for [ABFR's], incl. DBDPE before Q3 2029, and for some [OPFR's] before Q4 2031.
- Beware of imports of chemicals from outside EU! EU Reach inspections happen and penalties are painful. Also close to EU – in both Turkey & UK – compliancy is needed for FR formulations.
- Substitution of DBDPE? 'The proof of the pudding is in the eating', so case by case evaluation! As formulator of both halogenated (< BSEF) and non-halogenated (< Pinfa) Flame Retardants, we believe both have their added value for the future!
- Having become a member of the Campine family, we believe we can even serve you better!

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Q&A

- Many thanks for your attention!

- pinfa Phosphorus, Inorganic & Nitrogen Flame Retardants Association documentation available !

- In case of further questions:

Erwin Boënne, Regulatory Affairs & Quality Manager
eboenne@flamaway.com
0498/44 58 94
052/45 85 44

CTF 2000 Flame Retardant Chemicals & Textile Specialties
FLAMAWAY GROUP
WWW.FLAMAWAY.COM


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