



# Contents

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# 01. Message from President and Secretary General



**Urs Hauser**  
FEA President



**Alain D'haese**  
FEA Secretary General

Dear Valued FEA Members,  
Dear Respected Stakeholders,  
Dear Friends,

The 2023-2024 period has been challenging. The EU economy is expected to grow by just 1.2% in 2024, and EU industrial producers are experiencing persistent difficulties, reflected in the lowest level of capacity utilization (excluding Covid) in a decade.

However, there are positive signs on the horizon. Inflation is expected to continue its steady decline, approaching 2.0% in 2025. Increased private consumption and investment should be the main drivers of growth in 2024.

The war in Ukraine and the situation in the Middle East remain concerning and continue to impact our economy. Additionally, the significant investments required for security and defence are diverting funds from other important policies.

We face environmental challenges of unprecedented scale and urgency. Despite progress, further efforts will be needed to achieve climate neutrality and zero pollution.

A large amount of new legislation has been adopted under the 2019-2024 European Commission. Implementing these in the coming months and years will require significant expertise and resources. A review of the REACH Regulation will also be launched under the new European Commission 2024-2029, which will continue to be chaired by von der Leyen.

Despite the difficult backdrop of recent years, our statistical figures show that we have not managed to return to the growth we need, although the cosmetics sector seems to be rebounding. This is felt within our companies and, consequently, within our national associations.

BAMA, the national aerosol association for the United Kingdom, has decided to leave the Federation. We thank our British colleagues for their commitment and expertise over many years and wish them farewell.

Adapting to these multi-crisis times is essential. Our industry and our Federation must rise to the challenge. No single organisation can effectively overcome all obstacles, so it is crucial that we remain united and leverage our collective intelligence.

**We are committed to supporting our members in identifying and addressing relevant issues in an ever-changing business environment. We firmly believe that your investment in expertise remains the cornerstone of a dynamic and sustainable future for aerosol dispensers.**

Your feedback and participation are paramount to our joint success. Your insights and experiences will help shape our initiatives and strengthen relationships. We therefore encourage you to not only participate but also to engage with us, by getting involved or by simply sharing ideas.

Thank you for entrusting us with this mission. Your confidence in the FEA fuels our perseverance.

## 02. Steering FEA in 2024



**Volker Krampe**  
Chair of the Steering  
Committee



**Laurent Flond**  
Deputy Chair of the  
Steering Committee



**Adrian McCretton**  
Deputy Chair of the  
Steering Committee

**The Steering Committee continued to take numerous decisions throughout the period 2023/24 ensuring that all relevant technical issues were properly discussed and managed. This report gives a summary on main subjects, which were managed by the Steering Committee.**

**The Steering Committee agreed on a major revamp of its priority list with a more user-friendly layout but also a ranking of the priorities resulting from an in-depth discussion. This paper is a living document in which issues and priorities will evolve.**



In October 2017, the EC ADD Working Group supported initiating the legislative process for an adaptation to technical progress of the Aerosol Dispensers Directive 75/324/EEC, towards the **increase of the maximum total capacity of plastic aerosol dispensers** meeting the requirements of appropriate testing. **FEA launched its Code of Practice for PET Aerosol Dispenser Recyclability in the EU.** This initiative intends to transparently demonstrate the transition of the aerosol industry to fully recyclable plastic aerosol dispensers.

The European Commission intends to carry out an additional study with PET aerosols using recycled PET, aligned on the requirements of the future Packaging & Packaging Waste Regulation. FEA warmly welcomes the move and is ready to facilitate the study as appropriate.

The Steering Committee approved a Q&A on the particulates emitted from aerosol dispensers to support National Associations and their members when discussing this topic.

➤ For the **few aerosol categories still using fluorinated greenhouse gases**, the aerosol dispenser industry has already substituted HFC-134a (non-flammable liquefied gas, GWP 1430) by HFO-1234ze (non-flammable liquefied gas, GWP 1.37). But the F-gases III Regulation (EU) 2024/573 which was published in February 2024, contain new prohibition provisions for personal care products and technical aerosols.

The Steering Committee swiftly adopted a **briefing paper** on this new piece of legislation to support its implementation. However the implementing act on labelling should only be released later in the year. Obviously, we can question the appropriateness of regulators' decision to leave only few months to the industry to implement the new labelling provisions, while the common practice in chemical legislations is an 18-month transition.

The European Chemicals Agency (ECHA) received more than 5000 comments on the 'universal' PFAS restriction proposal. The Committee for Risk Assessment (RAC) and the Committee for Socio-Economic

Analysis (SEAC) decided to evaluate the proposed restriction together with these comments in batches, focusing on the different sectors that may be affected.

After September 2024, the next sectors for discussion will include the applications of fluorinated gases.



FEA strongly supports a long transition period for technical aerosols for applications where non-flammability and high technical performance are required. Certain technical aerosols need to use HFO-1234ze to guarantee non-flammability while maintaining product performance, for example the disinsection of aircrafts to prevent the spread of illnesses like malaria, zika or chikungunya in the EU.

➤ 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 made proposals to align special provision 63 of the UN Model Regulations with the more recent text of special provision 362 related to chemicals under pressure.** A final text is expected to be approved in December 2024.

➤ FEA also participates to discussion concerning the differentiation between UN 1950 Aerosols and UN 2037 **Receptacles, small, containing gas (gas cartridges)**, led by the German authorities. Despite the fact there is no safety concern, some authorities would prefer stopping the existing flexibility to choose between the two categories in some limited circumstances.

Several proposals were already discussed but none of them are without economic impacts.

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 positive impact on e-commerce, however the proposal has still to be outbalanced to additionally allow modern 'click & collect' as well as 'click & deliver' concepts.



The FEA Guide on Transport of Aerosols has been updated by the Transport WG and the Steering Committee approved the new version.

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 already being recycled successfully in Europe and around the world. In the scope of the new **Packaging & Packaging Waste Regulation**, regulators agreed with FEA 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 entire aerosol market, glass and plastic aerosols should be covered by the same provisions.

The European Parliament and Council reached a provisional agreement in March 2024, and the agreement was adopted by the European Parliament at its last plenary session in April 2024 before the European elections.

Because a legal-linguistic finalization is still needed, the text will only be published later this year. This will only be the first step of a very demanding implementation phase.

➤ The **CLP Regulation (EC) No 1272/2008 is based on the UN Globally Harmonized System of classification and labelling of chemicals (GHS) and has been revised**. The European Parliament and Council reached a provisional agreement in December 2023, and the agreement was adopted by the European Parliament in April 2024.

Because a legal-linguistic finalization is still needed, the text will only be published later this year. The agreed text includes new obligatory formatting rules which will impact the labelling of aerosol dispensers under CLP.

Ursula von der Leyen has been re-elected as President of the European Commission by the European Parliament in July 2024. She wrote in her political guidelines for the next Commission (2024-2029) that they will put forward a new chemicals industry package, aiming to simplify REACH and provide clarity on PFAS.



- FEA continues to participate in relevant UN correspondence working groups. A revision of the Chapter 2.3 related to aerosols and chemicals under pressure of the UN GHS has been adopted by the Sub-Committee of Experts on the GHS.
- FEA positively contributed to its preparation and submit itself a complementing proposal. The Sub-Committee of Experts on the Transport of Dangerous Goods being the focal point for physical hazards, it means that all papers were discussed in both UN Sub-Committees.

➤ FEA continues to be involved in the **Downstream Users of Chemicals Co-ordination Group (DUCC) which contributes to issues relating to the EU Chemicals Strategy for Sustainability and the implementation of REACH and CLP**.

➤ The European Parliament adopted in April 2024 the provisional agreement concerning a directive on **ambient air quality and cleaner air for Europe (AAQD)**. The text will be published later this year after a legal-linguistic review. The deal includes stricter 2030 standards for several pollutants compared to current rules, notably for PM2.5 and NO2.



The Commission will be required to review EU standards by the end of 2030 (and every 5 years thereafter) to assess options for alignment with the WHO guidelines and latest scientific evidence.

The text also includes new rules on access to justice and compensation.

- In December 2023, Parties to the **UNECE Convention on Long-range Transboundary Air Pollution** to revise the Protocol to Abate Acidification, Eutrophication and Ground-Level Ozone, as amended in 2012 (Gothenburg Protocol) which is expected to further strengthen efforts to reduce air pollution in Europe.

In parallel the Commission works on the next revision of the National Emission reduction Commitments Directive (EU) 2016/2284.

- Directive (EU) 2024/825, which was published in March 2024, amends the Unfair Commercial Practices Directive 2005/29/EC, as well as the Consumer Rights Directive 2011/83/EU, as regards empowering consumers for the green

transition through better protection against unfair practices and through better information. The objective is to improve product labelling and ban the use of misleading environmental claims. In supplement, a directive on substantiation and communication of explicit environmental claims ('green claims directive') is still under ordinary legislative procedure.

- The **Ecodesign for Sustainable Products Regulation (EU) 2024/1781 (ESPR)** was published in June 2024. It establishes a framework for ecodesign requirements, including performance requirements such as but not limited to a product's recycled content, recyclability and environmental impacts, including carbon footprint and environmental footprint, for products sold in the EU.

A fundamental element of the ESPR is the introduction of a Digital Product Passport (DPP) which would carry a product's information requirements, providing information on performance, traceability, technical documentation, harmful chemicals, user manuals and facilitating the recycling of products.

A first working plan could include iron and steel, aluminium, detergents, paints, lubricants, chemicals.

- Other legislations were adopted in 2024: the Environmental Crime Directive (EU) 2024/1203 published in April 2024, the Critical Raw Materials Regulation (EU) 2024/1252 published in May 2024, the Corporate Sustainability Due Diligence Directive

(CSDDD) (EU) 2024/1760 published in July 2024, the EU Product Liability Directive still to be formally approved by the Council and published.



- **FEA co-signed the Antwerp Declaration which calls for a European Industrial Deal to complement the Green Deal and keep high quality jobs for European workers in Europe, but also to boost demand for net zero, low carbon and circular products.**
- **FEA also co-signed a European Industry Joint Manifesto which asks for relaunching Europe's competitiveness, whilst confirming an unwavering support for sustainability goals and the economic transition.**



Finally, we would like to thank the co-operative 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. BAMA leaving FEA at the end of the year, we want to especially thank our colleagues from the UK for their sound contributions across the years.

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

# 03. FEA expertise and networking : a world of opportunities



**Valérie Boulet**  
Communications & Events Manager

January is the time each year when the Paris Packaging Week is held, and FEA in partnership with ADF shares the mission to run the packaging innovation event dedicated to aerosols and dispensing technology.

➤ Last edition of ADF Paris in January 2024 brought together **more than 3500 key players in the global aerosol industry** for two intense days, featuring numerous pivotal moments where the FEA plays a crucial role.

➤ The 2025 upcoming edition on January 28 and 29 will once again feature an excellent programme:

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





28 / 29 January 2025



In January 2024, Visionairy wins the FEA Aerosol Startup Award, an AI-based computer vision is a new way of optimising computer vision in this market, and can help teams to replace the operator on higher value-added tasks, avoiding manual control, avoiding scraps in the factories and bringing agility and performance and quality management to the facilities.

Image on the right: Elisabeth Monteiller (Visionairy) and Alain D'haese (FEA)



Image source: EASYFAIRS

# 04. The Committee of National Association Directors (CNAD)



**Jean Blottière**  
Chair of the CNAD

2024 started with the major industry rendezvous in France, through **Paris Packaging Week ADF**. **CNAD at national level had promoted this event through various communication channels** (emails to members, reposts on LinkedIn, presentations at national events). Most of our members were either exhibitors or visitors, which was a great success. It was also the **first time that FEA chaired the innovation awards** and Alain did a great representation of the industry expertise.

CNAD main task remained to provide the right service to its own members. CNAD permanent staff was becoming more and more involved in FEA various WG and TF. The reason is the difficult economic environment, where each National Association is facing a

penury of resources from their own members to join all FEA WG and TF. On top of that, N/A directors had to maintain membership and gain some additional ones.

The major issue for CNAD has been the decision from BAMA to resign from FEA. BAMA had its reason and FEA tried to do all possible to keep BAMA as a valuable member. Unfortunately, despite the efforts from both parties, an agreement could not be found. This is leaving N/A facing financial challenges. CNAD has expressed that a sustainable solution must be found.

➤ Apart from normal advocacy, CNAD put some energy on **Recycling of aerosols**. With PPWR now in place, CNAD felt necessary to drive a European investigation on a % rate of aerosol recycling. Unfortunately, due to the diversity of collection, sorting and recycling aerosols in various FEA members countries, it is not

possible to estimate a realistic level of recycling rate. The proposal that was passed on to the Recycling Task Force is to use the official EU member states figures for metal.

- Another subject that was raised amongst CNAD is the **100% testing of aerosols containing compressed gazes**. Some N/A are keen in working towards an exemption for non-flammable, non-toxic nor corrosive aerosols. The subject is important for members of N/A who would like to reduce their energy consumption.

The committee reworked the complete format of FEA priority list. The revised format allows to have a clearer view of both the importance, the emergency of topics and how they relate to the larger subjects.

- Finally, CNAD provided some input in various discussions related to **FEA communication** and ways of working. Hopefully, these discussions will improve how N/A members do perceive FEA and its added value.



Intense continuous activity as you can see, and this is only achievable because my colleagues are here in support. I want to thank all of them, including our new colleague from IGA, Andrea Weber.

We are all looking forward to a challenging year 2025, which also will be a special year because our British colleagues won't be around our table.

Patrick and Paul, I want to say "merci" both for your long years of participation and unvaluable contribution to CNAD. And as we say, never say never...

# 05. Facts and figures



## European production

➤ Based on reported fillings for European aerosol products, total unit production held steady at **5.2 billion units in 2023**.

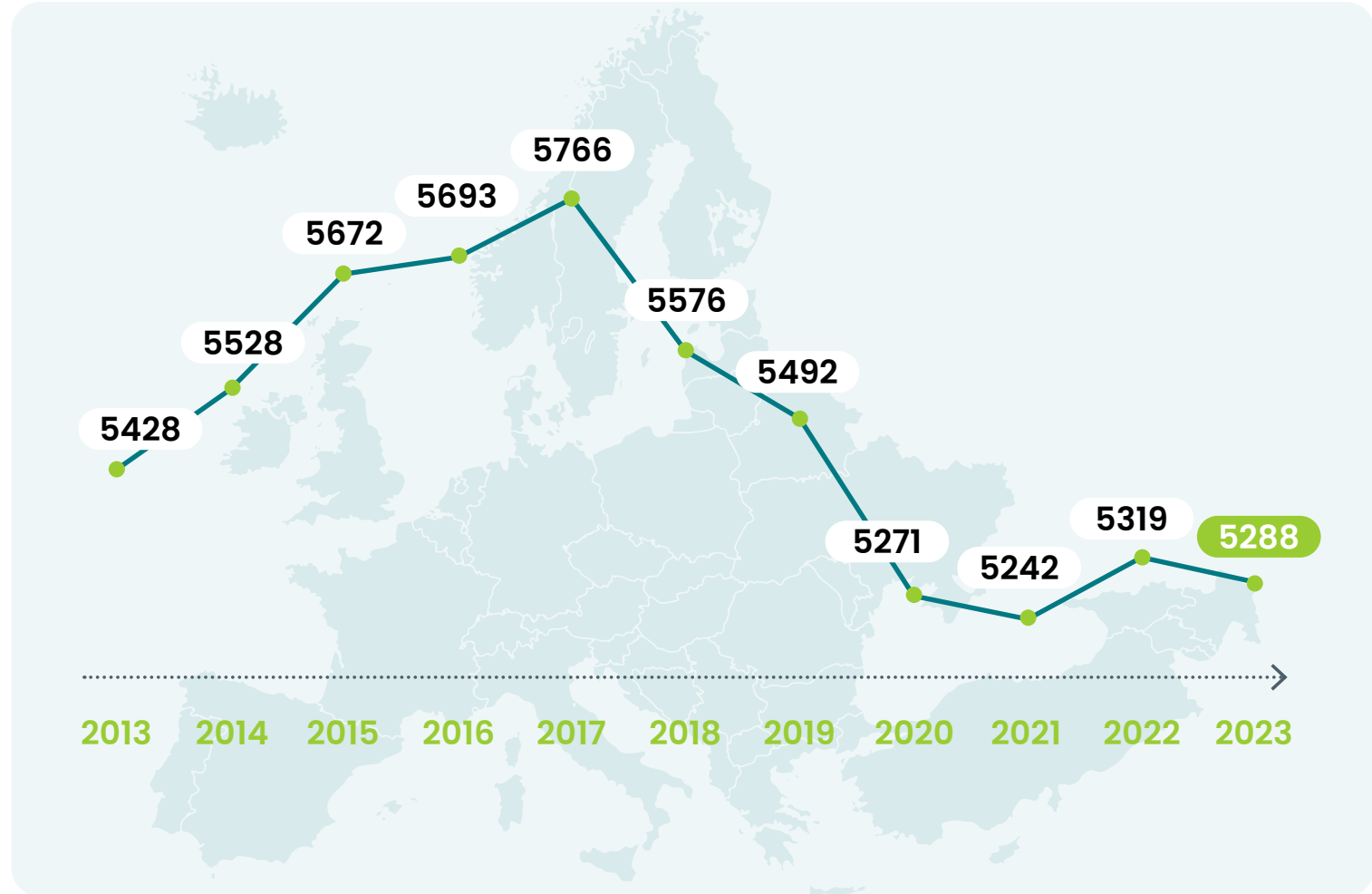


Fig.1 European production evolution (2013-2023, in '000 000 units)





## Production by country

➤ **The United Kingdom, Germany, and France account for over 55% of Europe’s annual aerosol production across all segments. In collaboration with Italy, the Netherlands, and Spain, they collectively produced more than 4.0 billion aerosol dispensers in 2023.**

Fig. 2 European aerosol production 2023 (share by country)

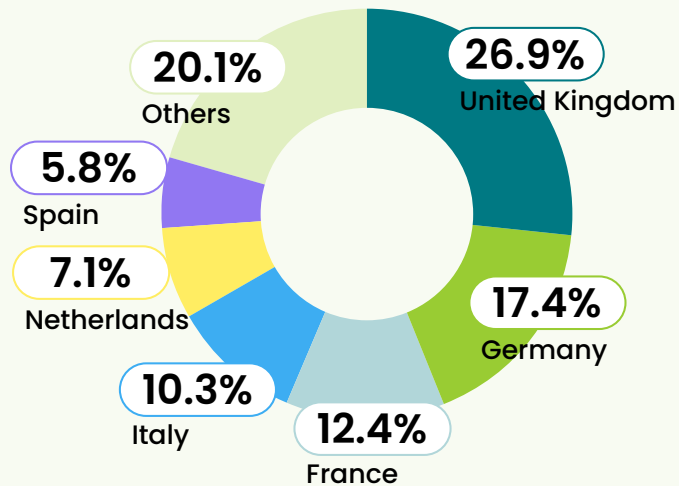
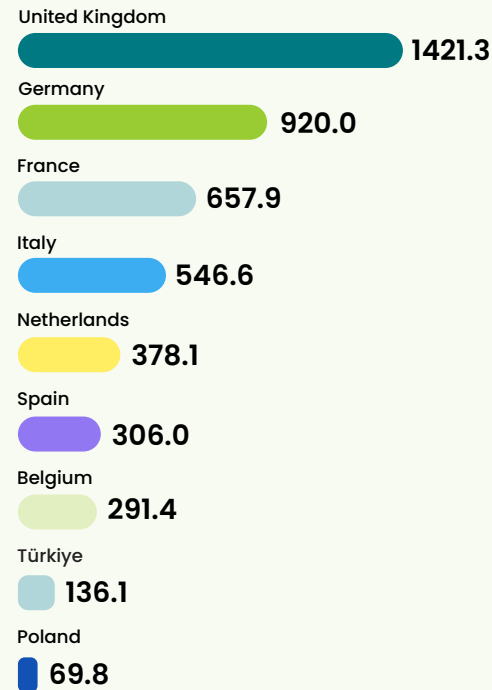


Fig. 3 European aerosol production 2023 (main countries, in '000 000 units)

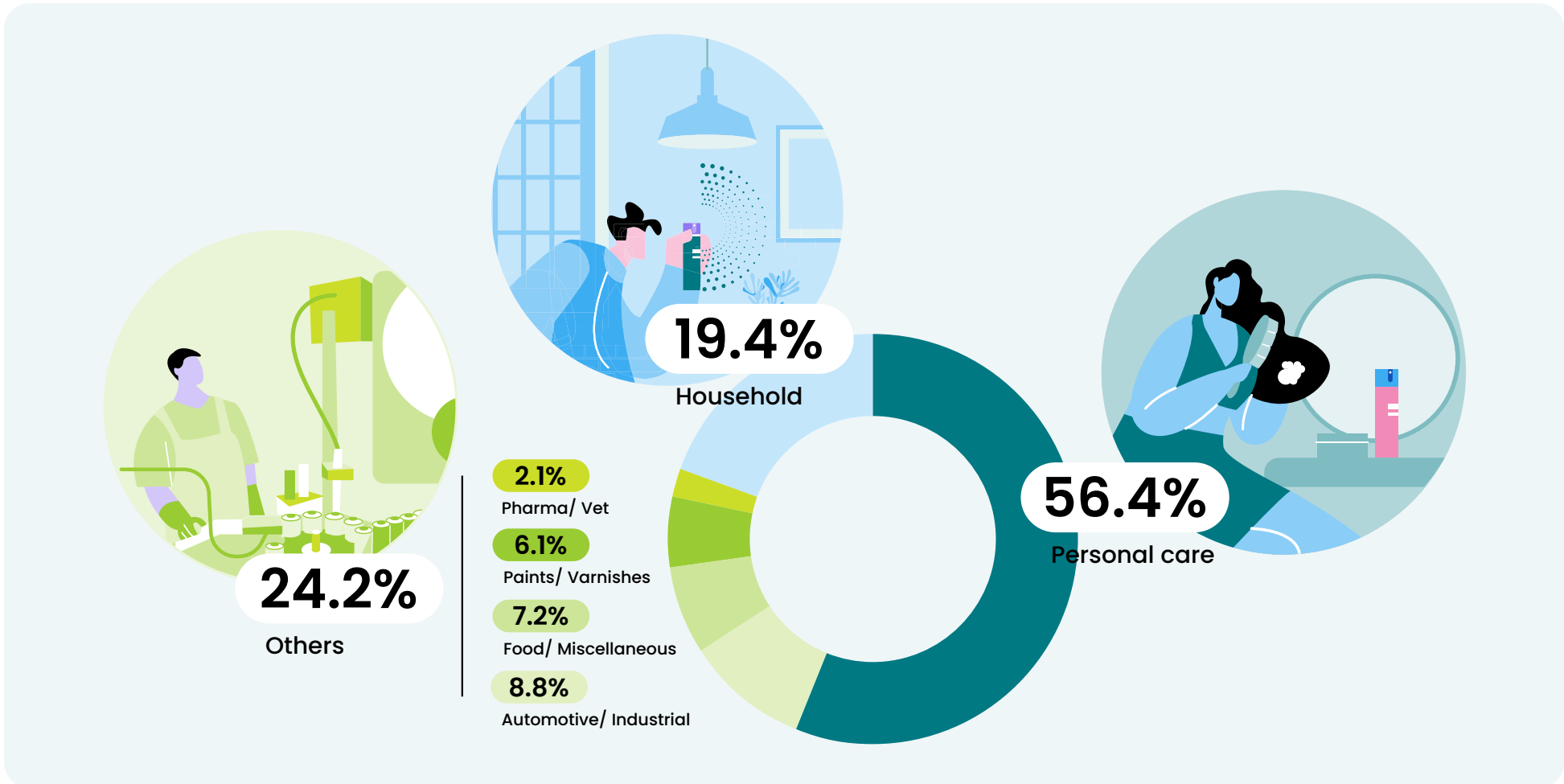






## Production by segment

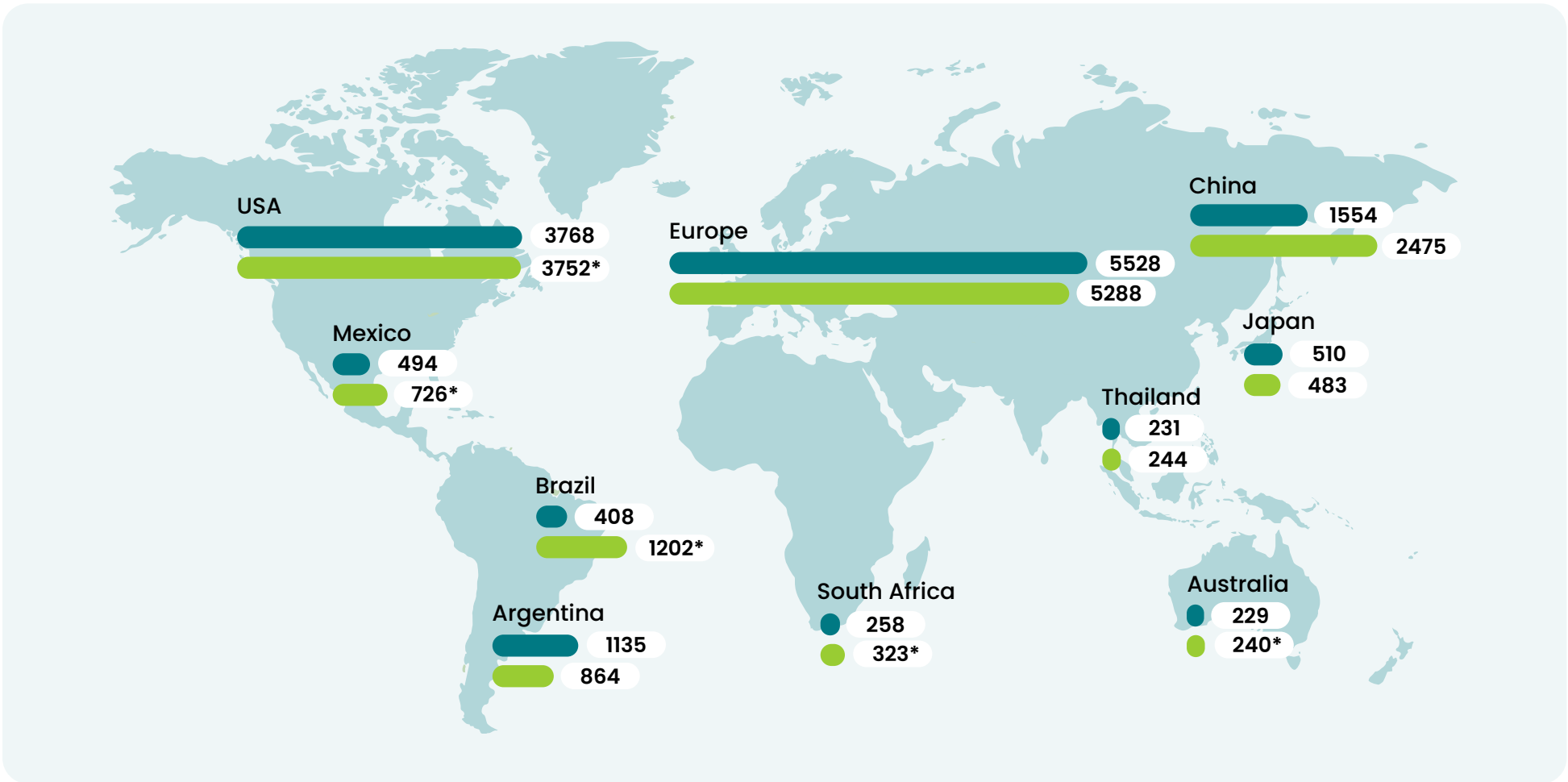
➤ Aerosol containers are primarily made of steel and aluminium, whereas glass and plastic containers remain marginal. **Cosmetics and household products represent more than three-quarter of the European production.**





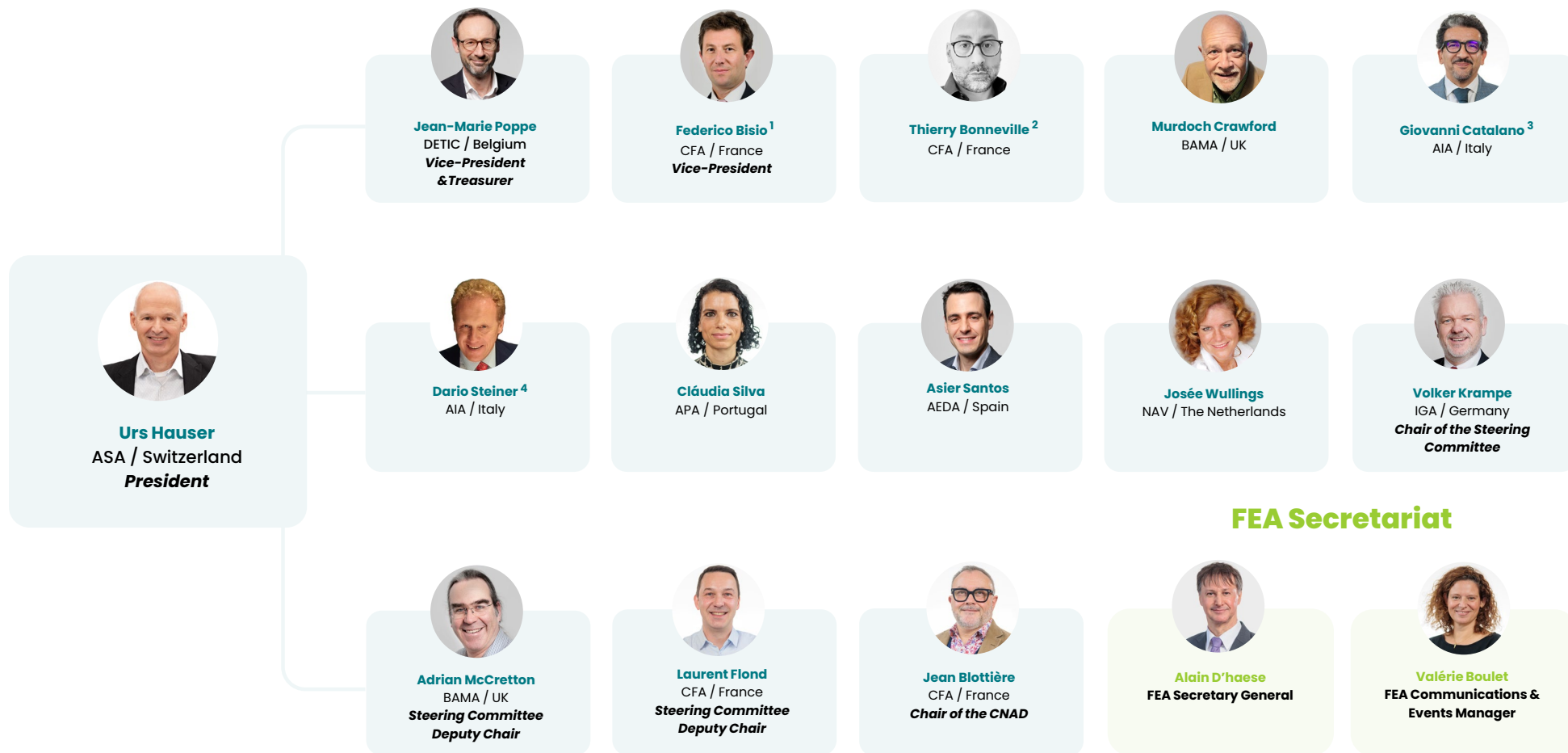
# Worldwide production

(in '000 000 units) 2013 2023



\* Based on the data currently available. No available data for 2023.

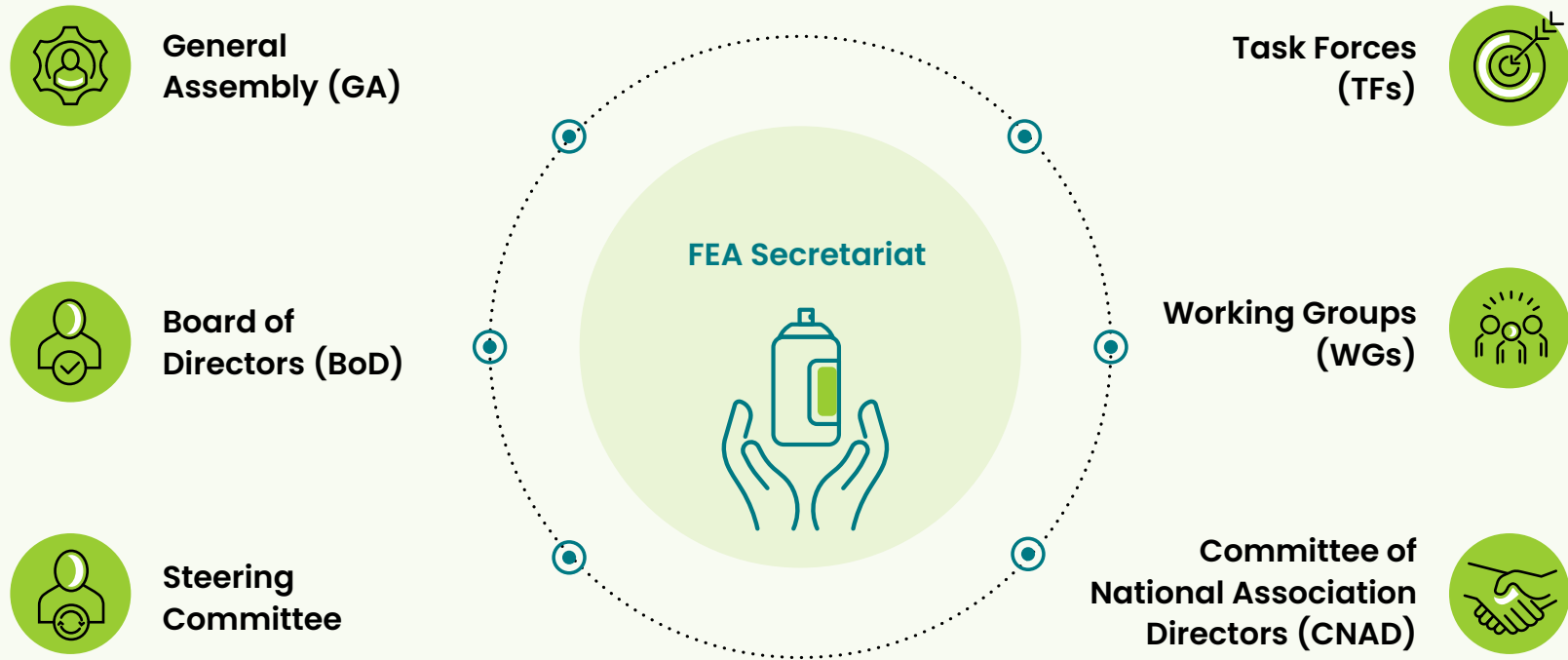
# 06. Board of Directors and Secretariat



<sup>1</sup> until April 2024  
<sup>2</sup> from April 2024  
<sup>3</sup> until February 2024  
<sup>4</sup> from February 2024

# 07. Governance and structure

An effective network to the benefit of the European aerosol industry



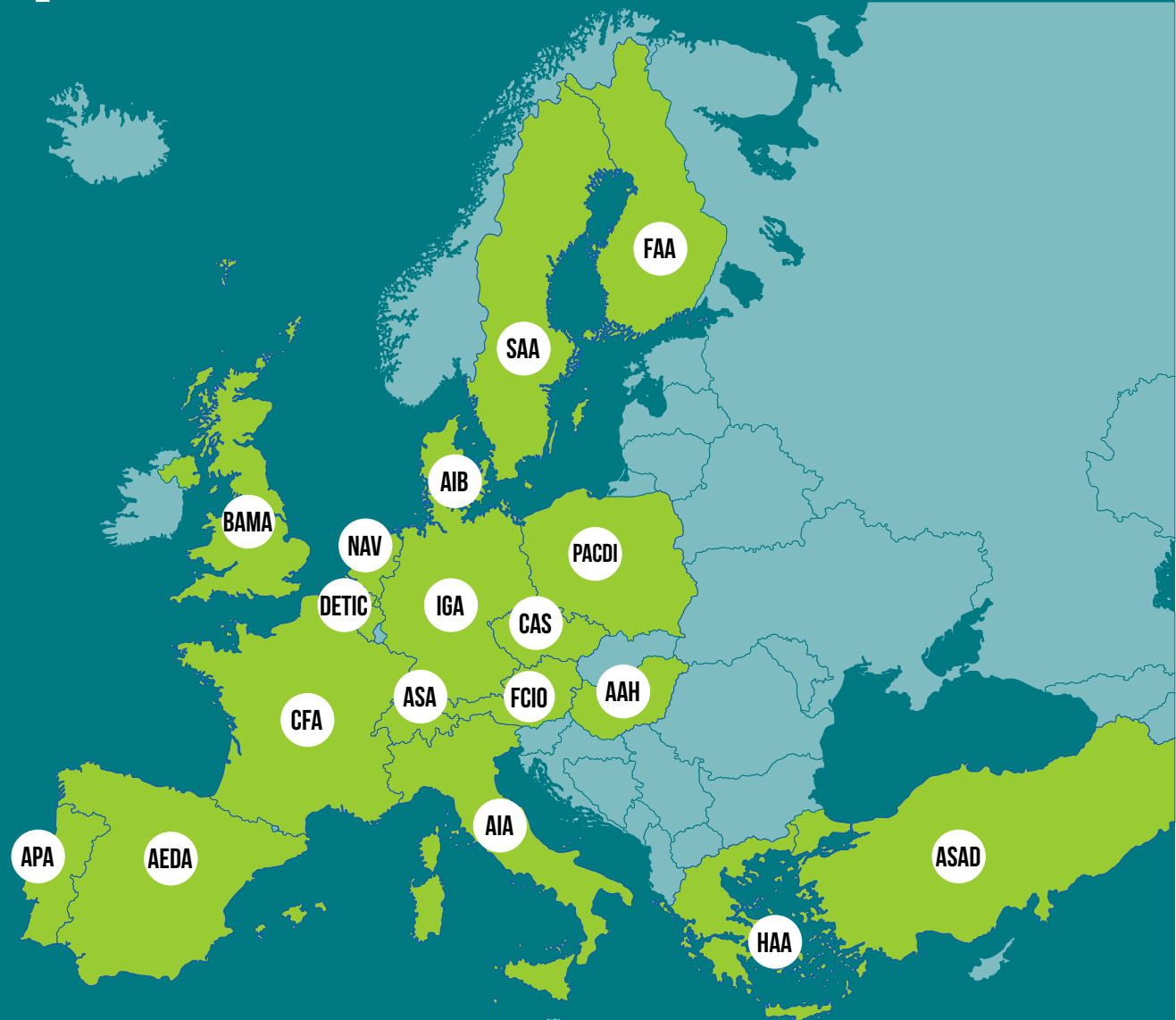
# 08. Membership

## 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](https://www.fcio.at)

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## ▶ 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](https://www.be-aerosols.be)    ✉ [secretariat-detic@detic.be](mailto:secretariat-detic@detic.be)

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## ▶ Czechia

CAS – Ceske Aerosolo Ve Sdruzeni

🌐 [cz-aerosol.cz](https://www.cz-aerosol.cz)    ✉ [info@cz-aerosol.cz](mailto:info@cz-aerosol.cz)

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## ▶ Denmark

AIB – Aerosol Industries Brancheforening

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## ▶ Finland

FAA – Finnish Aerosol Association

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## ▶ France

CFA – Comité Français Des Aerosols

🌐 [cfa-aerosol.com](https://www.cfa-aerosol.com)    ✉ [rtemani@cfa-aerosol.com](mailto:rtemani@cfa-aerosol.com)

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## ▶ Germany

IGA – Industrie-Gemeinschaft Aerosole e.V.

🌐 [aerosolverband.de](https://www.aerosolverband.de)    ✉ [info@aerosolverband.de](mailto:info@aerosolverband.de)

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## ▶ Greece

HAA – Hellenic Aerosol Association

🌐 [haa.gr](https://www.haa.gr)    ✉ [haaent@otenet.gr](mailto:haaent@otenet.gr)

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## ▶ Hungary

AAH – Aerosol Association Of Hungary

✉ [csaosz@csaosz.hu](mailto:csaosz@csaosz.hu)

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## ▶ Italy

AIA – Associazione Italiana Aerosol

🌐 [aia.federchimica.it](https://www.aia.federchimica.it)    ✉ [aia@federchimica.it](mailto:aia@federchimica.it)

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## ▶ Netherland

NAV – Nederlandse Aerosol Vereniging

🌐 [nav-aerosol.nl](https://www.nav-aerosol.nl)    ✉ [info@nav-aerosol.nl](mailto:info@nav-aerosol.nl)

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## ▶ Poland

PACDI – Polish Association Of Cosmetic And Detergent Industry

🌐 [kosmetyki-detergenty.pl](https://www.kosmetyki-detergenty.pl)    ✉ [biuro@kosmetyki-detergenty.pl](mailto:biuro@kosmetyki-detergenty.pl)

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## ▶ Portugal

APA – Associacao Portuguesa De Aerosois

✉ [apa@fiovde.pt](mailto:apa@fiovde.pt)

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## ▶ Spain

AEDA – Asociacion Espanola De Aerosoles

🌐 [aeda.org](https://www.aeda.org)    ✉ [aeda@aeda.org](mailto:aeda@aeda.org)

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› Sweden

SAA – Swedish Aerosol Association

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› Switzerland

ASA – Association Suisse De Aerosol

🌐 [swiss-aerosol.ch](http://swiss-aerosol.ch)    ✉ [info@swiss-aerosol.ch](mailto:info@swiss-aerosol.ch)

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› Türkiye

ASAD – Aerosol Sana Yicileri Derneji

🌐 [aerosol.org.tr](http://aerosol.org.tr)    ✉ [asad@aerosol.org.tr](mailto:asad@aerosol.org.tr)

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› United Kingdom

BAMA – British Aerosol Manufacturers Association

🌐 [bama.co.uk](http://bama.co.uk)    ✉ [enquiries@bama.co.uk](mailto:enquiries@bama.co.uk)

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## Worldwide

› Argentina

CADEA – Camara Argentina Del Aerosol

🌐 [cadea.org.ar](http://cadea.org.ar)    ✉ [cadea@cadea.org.ar](mailto:cadea@cadea.org.ar)

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› Australia

AAANZ – Aerosol Association of Australia & New Zealand

🌐 [aerosol.com.au](http://aerosol.com.au)    ✉ [info@aerosol.com.au](mailto:info@aerosol.com.au)

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› Brazil

ABAS – Associacao Brasileira De Aerossois

🌐 [abas.eco.br](http://abas.eco.br)    ✉ [abas@abas.eco.br](mailto:abas@abas.eco.br)

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› China

CPF – China Packaging Federation

🌐 [aerosolchina.com](http://aerosolchina.com)    ✉ [info@aerosolchina.org](mailto:info@aerosolchina.org)

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› Chile

CCA – Camara Chilena Del Aerosol

✉ [camaradelaerosol@gmail.com](mailto:camaradelaerosol@gmail.com)

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› Mexico

IMAAC – Instituto Mexicano del Aerosol A.C.

🌐 [imaacmexico.org](http://imaacmexico.org)    ✉ [claudia.lince@imaacmexico.org](mailto:claudia.lince@imaacmexico.org)

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› Russia

RAF – Russian Aerosol Federation

✉ [eduard\\_ps@mail.ru](mailto:eduard_ps@mail.ru)

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› Ukraine

UUAPM – Ukrainian Union of Aerosol Products Manufacturers

✉ [uuapm2020@gmail.com](mailto:uuapm2020@gmail.com)

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› USA

HCPA – The Household and Commercial Products Association

🌐 [thehcpa.org](http://thehcpa.org)    ✉ [info@thehcpa.org](mailto:info@thehcpa.org)

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› Venezuela

CAVEA – Camara Venezolana De Aerosoles

✉ [cavea111@gmail.com](mailto:cavea111@gmail.com)

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