

## Per- and polyfluoroalkyl substances (PFAS)

PFAS are a large group of synthetic chemicals containing carbon-fluorine bonds, which are among the strongest chemical bonds in organic chemistry. This resistance enables their use in a wide range of sectors but also leads to accumulation in the environment, drinking water, and food. For this reason, PFAS are often referred to as “forever chemicals”. In addition, some members of this substance group exhibit properties that are directly harmful to human health. Without regulatory intervention, it is assumed that the level of irreversible contamination would be exceeded.


Some PFAS are already subject to chemical control measures. For example, the Stockholm Convention, which bans PFOS, PFOA and PFHxS has been signed by 152 countries and regions. The European Union implemented the Convention through Regulation (EU) 2019/1021 on persistent organic pollutants (POP). Further examples include the restriction under Regulation (EC) No 1907/2006 (REACH) for perfluorinated carboxylic acids (C9-14 PFCAs), their salts and any combinations thereof, which have been restricted in the EU/EEA since February 2023, as well as Regulation (EU) No 2024/573 on fluorinated greenhouse gases, which aims to reduce emissions of several PFAS listed in its Annexes. Additional regulatory measures are expected to close the gap between currently regulated PFAS and the substance group as a whole, as the persistent and accumulative properties are characteristic of all PFAS.

The European Chemical Agency (ECHA) has published a draft restriction to further regulate PFAS under REACH. The proposal is based on the chemical structure of PFAS and therefore covers all existing PFAS as well as potential future substances, with the objective of preventing regrettable substitution. If adopted, the restriction would prohibit the manufacture, placing on the market and use of approximately 10,000 substances, including in mixtures or articles, generally without concentration thresholds and with only limited derogations for specific uses. The proposed broad restriction is not yet in force. During the public consultation of the Annex XV report, approximately 5,600 comments were submitted by stakeholders. Due to the exceptionally high number of comments, the finalization of the restriction is taking longer than usual. Following this process, the European Commission will consider the proposal, with the earliest expected compliance date currently estimated to be 2028.

In the United States, the Environmental Protection Agency (EPA) established a PFAS Strategic Roadmap from 2021 to 2024, aiming to research, restrict and remediate PFAS. In January 2024, EPA finalized a Significant New Use Rule (SNUR) that strengthens PFAS regulation by preventing the resumption of manufacture or processing of 329 inactive PFAS without prior EPA review. In addition, Section 8 of the Toxic Substances Control Act (TSCA) introduced the PFAS Reporting Rule in October 2023. Companies located in the United States are required to report their uses of PFAS to the EPA dating back to 2011. The reporting period started in July 2025 and extends until January or July 2026, depending on company size.

Insta GmbH is aware of the global regulatory focus on PFAS and closely monitors applicable legal requirements. To ensure continued supply capability, Insta GmbH implements necessary measures in a timely manner.

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