Application Note

FESTO

Information about substances in our products



Information about
Substances in our
products

100325

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1 Introduction

Festo SE & Co. KG complies with the national and international laws, directives, standards and regulations applicable to our products. We monitor the dynamics of legislation and the following approach supports us in this:

- Our suppliers undertake to comply with substance bans and declaration obligations.
- An internal team of experts checks the products for risk factors.
- The parts supplied are checked cyclically for compliance with substance bans and declaration obligations.
- In the event of conspicuous analysis results, we immediately initiate quality assurance measures.
- Products that fall within the scope of an EU directive bear the CE mark and have a declaration of conformity.

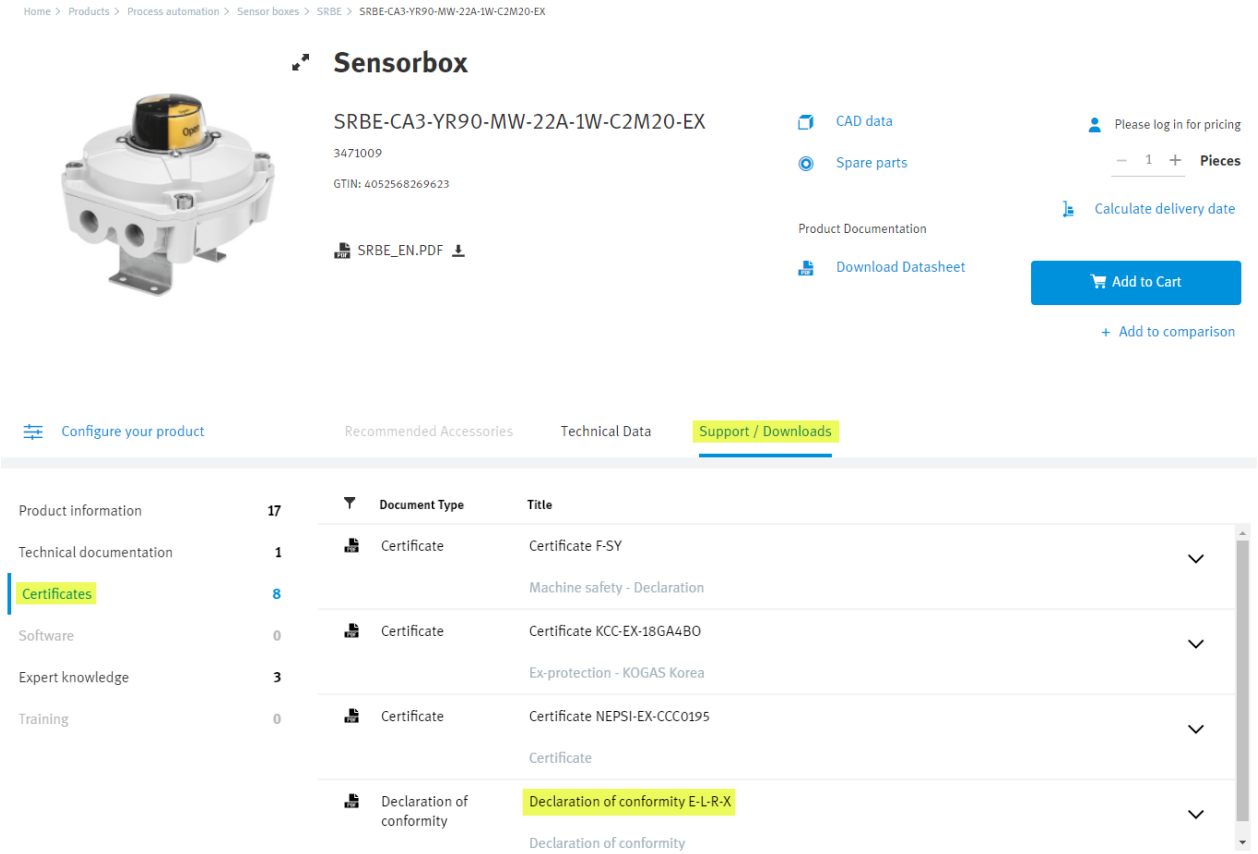
This application note provides an overview and answers the most frequently asked questions about international regulations. If your question is not answered, please contact technical customer service or your local contact center.

2 CE marking

If a product falls within the scope of a specific CE regulation (e.g. ATEX, RoHS, EMC...), it bears a CE mark and a declaration of conformity is available.
The title already describes which directives they contain (e.g. "Declaration of Conformity E-L-R-X").
The abbreviations in the titles stand for the following guidelines:

Abbreviation	Definition (EN)	Directive designation (EN)	Directive
E	EMC	EU EMC Directive	2014/30/EU
F	RED	EU Radio Equipment Directive	2014/53/EU
L	Low voltage	EU Low Voltage Directive	2014/35/EU
M	Machinery directive	EC Machinery directive	2006/42/EC
Pressure	Pressure equipment / Simple pressure vessels	EU Pressure equipment directive / EU Simple pressure vessels directive	2014/68/EU / 2014/29/EU
R	RoHS	EU Directive on the restriction of the use of certain hazardous substances in electrical and electronic equipment	2011/65/EU "RoHS 2"
X	ATEX	EU explosion protection directive	2014/34/EU

Here is an example of SRBE:



3 EU Directive 2011/65/EU (RoHS)

In the information on RoHS 2011/65/EU, Festo SE & Co. KG considers the extended scope, the associated CE marking, the expiry dates and the delegated version (EU) 2015/863.

Products that fall directly within the scope of RoHS are CE marked, and we provide a declaration of conformity in our support portal.
In general, you can find information on the RoHS conformity of certain products on our catalog pages.

The RoHS-compliant labeling includes the application of the valid exemptions of Annexes III and IV of Directive 2011/65/EU. The exceptions 6(a)I, 6(b)II, 6c und 7(a)I – 7(a)VII, 7(c)II, 7(c)VI mainly apply to Festo products.

RoHS compliance in the future:
Festo has been gradually converting its components to RoHS-compliant materials for many years.
Our aim is to manufacture all products without the exemptions in the future.
The changeover is based on the availability of alternative materials, technical and economic feasibility and takes changing legislation into account.

We prioritize the Change Over according to market requirements.

3.1 Delegated Directive (EU) 2015/863

Delegated Directive (EU) 2015/863 is an update of ANNEX II to Directive 2011/65/EU. Directive (EU) 2015/863 is part of EU Directive 2011/65/EU.
There is no RoHS 3 directive.
The phthalates listed in the delegated version (EU) 2015/863 are not used at Festo.

4 China RoHS GB 26572-2025

Our components are not included in the Chinese RoHS product catalog (GB 26572-2025). We provide information on the EU RoHS exemptions we use; these can be used in accordance with standard SJ/T 11364.

5 Regulation EC (No.) 1907/2006 (REACh)

Festo SE & Co KG takes into account the dynamics of the REACh Regulation 1907/2006 (EC). We continuously monitor changes and additions to REACh Annexes XIV, XVII and new candidate substances (SVHCs). We take the current candidate list into account.
Information on substances of very high concern (SVHC) in our products can be found in the Excel file attached to this application note. The file is updated quarterly.
Application note
As a manufacturer of products, we ensure the flow of information within the supply chain. Festo has no obligations arising from the registration or notification of substances and preparations.
Here is the current list of candidates:
List of substances of very high concern for authorization - ECHA (europa.eu)

5.1 SCIP database for articles containing SVHC

Festo SE & Co KG makes all relevant SCIP entries.
We fulfill our obligation to provide information in accordance with Article 33 of the REACh Regulation via the Excel file mentioned:
Application note

ECHA is responsible for the availability and linking of the data provided by Festo in the SCIP database.
Home - ECHA (europa.eu)

6 Conflict minerals (US Dodd-Frank Act and Regulation (EU) 2017/821)

Festo is a privately held company and is therefore not subject to the disclosure and reporting requirements of Section 1502 of the Dodd-Frank Act. In addition, Festo acts as a downstream user within the meaning of Regulation (EU) 2017/821.

Transparency and responsible sourcing are important principles for Festo. Therefore, we provide our customers with information that can reasonably be identified and verified within our supply chain. For this purpose, we use the standardized Conflict Minerals Reporting Template (CMRT).

With approximately 30,000 catalog products available in several hundred thousand variants and around 10,000 customer-specific solutions developed each year, Festo works with a large network of suppliers worldwide. As part of our due diligence process, we follow the recommendations of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and have implemented appropriate risk mitigation measures based on these guidelines. Relevant supplier information is collected and reviewed on a regular basis through the CMRT process. Based on this information, we provide our customers with an up-to-date CMRT.

Due to the complexity of global supply chains involving multiple production and distribution stages, complete and transparent traceability back to individual smelters is often not feasible. Consequently, Festo cannot guarantee that its products are 100% free of conflict minerals originating from conflict-affected or high-risk areas.

Furthermore, experience has shown that smelters listed in CMRT declarations cannot always be unambiguously verified or assigned to specific products or deliveries. This is primarily due to global sourcing structures, dynamic supply chains, and multi-sourcing strategies. For this reason, Festo does not directly contact non-certified smelters.

Our current CMRT is attached to this Application Note.

7 Radiactive substances

Festo products do not contain any radioactive substances.

8 TSE/BSE/ADI-free

EMEA/410/01 Rev. 3, reference to guidelines to minimize the risk of animal transmission
Spongiform encephalopathy pathogens caused by human and veterinary drugs
(Keyword: TSE/BSE/ADI-free)

The raw materials we use and the auxiliary and operating materials we use in production are free from materials of animal origin.

This includes the standard lubricants we use, which are sold as device-specific accessories, among other things.

The plastic granulate used as the raw material for our hoses is also free from materials of animal origin. The processes used to manufacture plastic products also virtually rule out the risk of contamination with BSE/TSE through exposure to high heat.

9 PFAS

This declaration is constantly adapted and updated in line with the current restriction procedure.

a) The proposal to restrict PFAS in the EU
   - ➔ We are currently involved in an ongoing restriction procedure in accordance with the REACh Regulation
   - ➔ There are still no legal bans or regulations for the approximately 10,000 PFAS defined in the restriction proposal.
   - ➔ There is currently no legal obligation to declare the above-mentioned PFASs

b) PFAS-containing products at Festo
   - ➔ Around 20% of our entire product portfolio contains PFAS, of which 60% are contained in fluoropolymers and 40% are contained in PTFE and PFPE lubricants.

   PFAS are used in the following materials:
   Plastics: PTFE, PFA, PVDF, ETFE, PCTFE
   Elastomers: FKM/FPM, FFKM/FFPM, FVMQ
   Greases: PTFE- and PFPE-greases

c) Area of application for PFAS-containing products
   - ➔ High temperature applications >150°C
   - ➔ Applications where chemical and thermal resistance are required.
   - ➔ Safety-relevant applications where abrasion resistance, leakage protection, sliding and dry-running properties and low wear are required.
   - ➔ Applications in the process industry, renewable energies, medical technology, food and packaging industry, special machine construction, electronics industry, etc.

d) Alternatives to PFAS in our products
   - ➔ For applications where the special material properties of fluoropolymers can be dispensed with, we are testing NBR, silicone and other alternatives.
   - ➔ Festo is also testing other/new materials as a replacement for PFAS in corresponding applications.
   - ➔ We monitor and promote the development of environmentally friendly, alternative materials and manufacturing processes and test innovations in corresponding applications.

e) Delivery reliability
   - ➔ The raw material situation is very dynamic, and manufacturers react sensitively to impending restrictions. Festo has qualified several reliable sources of supply in order to be able to deliver on a long-term basis.

f) Activities
   - ➔ Festo has taken every opportunity to participate in the restriction proceedings.
   - ➔ We keep ourselves continuously informed about the status and progress of the restriction process. We check and evaluate the resulting effects on our product portfolio and can react immediately.
   - ➔ The existing bans on PFOA, PFOS, PFHxS and other perfluorinated carboxylic acids in both the REACh and POP regulations are not covered by the restriction proposal. The applicable bans are complied with. Our products are regularly tested for this.

9.1 Regulation (EU) 2019/1021 on persistent organic pollutants (POPs)

The persistent organic pollutants regulated by the Stockholm Convention and the EU POP Regulation are neither used nor applied in Festo's products and production processes. The ban on the release of persistent organic pollutants is necessary because:

- They remain in the environment for a long time.
- They accumulate in the food chain.
- They can be transported over long distances in the environment.
- They can harm human health and the environment.

9.2 (EU) 2020/784 Perfluorooctanoic acid (PFOA) in the POPs Regulation

Since April 8, 2020, perfluorooctanoic acid (PFOA) and its salts as well as PFOA precursors have been included in the POP Regulation via the delegated version (EU) 2020/784. The manufacture, placing on the market and use of PFOA itself, in mixtures or in articles is therefore prohibited under Article 4 of the EU POPs Regulation.
In addition, the production and use of PFOA has been banned since July 4, 2020 via Annex XVII of the REACh Regulation.
Festo products are free from PFOA. Traces cannot be ruled out, as PFOA is ubiquitous in the environment.

10 Plasticizers in hoses, seals and cables

Festo products do not contain any plasticizers from the substance group of phthalates, which are regulated as SVHC according to REACh (EC) 2006/1907 and the delegated version of RoHS (EU) 2015/863 (see RoHS declaration). The plasticizers used are currently not included in any prohibition or declaration list.

11 (EU) 2023/1115 EUDR – Deforestation Regulation

Natural rubber and latex

Most Festo standard/catalog products do not contain natural rubber or latex.

The following products are subject to the EUDR due diligence requirements:

36486 Bellows Cylinder EB-145-60
36487 Bellows Cylinder EB-165-65
36488 Bellows Cylinder EB-215-80
36489 Bellows Cylinder EB-250-85
36490 Bellows Cylinder EB-145-100
36491 Bellows Cylinder EB-165-125
36492 Bellows Cylinder EB-215-155
36493 Bellows Cylinder EB-250-185
193788 Bellows Cylinder EB-325-95
193789 Bellows Cylinder EB-385-115
193790 Bellows Cylinder EB-325-215
193791 Ballast Cylinder EB-385-230

The due diligence reference number for these products can be found on the invoice.

12 US TSCA (Toxic Substance Control Act)

Competent authority: EPA - Environmental Protection Agency

The US EPA regulation "Persistent, Bioaccumulative and Toxic (PBT) Chemicals under TSCA Section 6h" refers to persistent chemicals and has been in force since March 9, 2021.
Product scope: substances, mixtures, products and articles
Material restrictions concern: Manufacture, processing, distribution
After January 6, 2025, PIP (3:1) is prohibited in products and mixtures. There are some special exceptions that do not reflect Festo applications.
Similar to REACh, the presence must be communicated along the supply chain.
The following five substances have been added to the TSCA list.

DecaBDE (*decabromodiphenyl ether,* CAS 1163-19-5)

- SVHC substance
- listed in REACH Annex XVII
- listed in Annex I, Part A and Annex IV of the POP Regulation
- Restriction in RoHS

⇒ *This substance is not used in Festo products.*

HCBD (hexachlorobutadiene, (CAS 87-68-3)

- listed in Annex I of the POP Regulation
- listed in the Stockholm Convention, Annex II

⇒ *This substance is not used in Festo products.*

PIP (3:1) (*Phenol, isopropylated, phosphate (3:1), (CAS 68937-41-7)*

- The substance is on the CoRAP list. This is the preliminary stage to an SVHC list (REACh candidate list)
- On March 3, 2022, the EPA published eCFR::40 CFR §751.407 PIP (3:1)
- General: The use of PIP (3:1) for processing and retail distribution, including PIP (3:1) articles, is prohibited from March 2021.
- After October 31, 2024, any processing and distribution as well as the use of
- After January 6, 2025, the processing and distribution as well as the use in adhesives and sealants or the use of such products is prohibited
- An exception applies to PIP (3:1) when processing lubricants and greases
- No threshold defined, which is equivalent to a complete ban.
- Downstream message
- May be contained in lubricants, greases and flame-retardant plastic parts. High risk in PVC, PU foams and epoxy resins.

⇒ *This substance is not intentionally added to Festo products.*

2,4,6-TTBT *(2,4,6-Tris(tert-butyl)phenol, CAS 732-26-3)*

- The substance is on the CoRAP list. This is the preliminary stage to an SVHC list (REACh candidate list)
- The restriction/prohibition only applies to substances/mixtures and not to articles.
- Restriction/prohibition> 0.3% w/w

⇒ *This substance is not intentionally added to Festo products.*

PCTP *(pentachlorothiophenol, CAS 133-49-3)*

- The substance is on the CoRAP list. This is the preliminary stage to an SVHC list (REACh candidate list)
- The restriction/prohibition applies to all articles.
- Restriction/prohibition> 1% w/w

⇒ *This substance is not intentionally added to Festo products.*

12.1 TSCA Section 8(a)(7) - PFAS Reporting and recordkeeping requirements for certain per- and polyfluoroalkyl substances

40 CFR Part 705

This part specifies the reporting and recordkeeping procedures for manufacturers and importers of perfluoroalkyl and polyfluoroalkyl substances (hereafter referred to as PFAS) under section 8(a)(7) of the Toxic Substances Control Act (TSCA).

Festo has identified products containing PFAS. We comply with the reporting obligation.

13 (EU) 2025/40 Packaging and Packaging Waste Regulation (PPWR)

Since **12 August 2026**, **Article 5 - Substance Restrictions (Restriction of Hazardous Substances)** must be complied with. Compliance with these requirements is confirmed by a **Declaration of Conformity**, which can be found in the Support Portal:
Search PPWR | Festo DE

This document lists all packaging materials used by Festo. It also includes packaging materials such as pellets, stretch film, etc., that do not have a part number printed on them.

Compliance with additional requirements, such as **recycled content**, **material composition**, and other obligations that will become mandatory between **2027 and 2038**, will be declared when the respective requirements enter into force.

14 IHM - Hong Kong- Convention

Resolution MEPC 379(80)
EU SRR - Regulation (EU) No. 1257/2013
Guidelines from 2015 for creating an inventory of hazardous substances.

Purpose: These guidelines provide recommendations for the preparation of an Inventory of Hazardous Materials (IHM) to comply with the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships, 2009.
An IMO IHM is similar to an EU SRR IHM, the list of reportable substances of the IMO IHM requires fewer entries.

The substances listed in Table A are not used in Festo products. Some of the substances are ubiquitous, so we cannot rule out traces of them.

For the substances listed in Table B, the MEPC has referred to the RoHS Directive 2011/65/EU, Annex II, and defined the limit values accordingly. Our information on RoHS applies here.

From 3.3.2 of MEPC. 269(68), the following information can also be found: Although electrical and electronic equipment must be listed in the inventory, the number of hazardous substances that may be contained in the printed circuit boards (PCBs) of the equipment need not be listed in the inventory.

Festo products therefore fulfill the requirements of MEPC. 269(68) and the SRR (EU) No. 1257/2013.

15 (EU) 2024/590, Substances that deplete the ozone layerx

Festo products do not contain any of the substances and mixtures listed in Annex III that deplete the ozone layer. No ozone-depleting substances are used in the production of our products.

16 (EU) 2024/573, fluorinated greenhouse gases

Festo products do not contain fluorinated greenhouse gases. No fluorinated greenhouse gases are used in the production of our products.

There is no obligation to register with the EU's F-Gas Portal or to report to customs authorities.

17 Halogen-free (chlorine, fluorine, bromine)

- The printed circuit boards we use may contain halogens
- PVC cables and sealing elements contain chlorine and therefore halogens
- Products made of PTFE, PFA, or FKM contain fluorine and therefore halogens
- Other Festo products are halogen-free

18 Food: Difference between FDA, extended material information (F-MATI) and the declaration of compliance according to Regulation (EC) No. 1935/2004, (EU) No. 10/2011, (EC) No. 2023/2006?

FDA:

We do not offer FDA certificates.

In its "Codes of Federal Regulations", the FDA publishes a list of materials and chemicals that are approved for contact with food at regular intervals. These FDA lists refer to individual materials and not to complete products, which usually consist of a large number of different components and/or materials.
We do not provide FDA certificates for products.

Extended material information (F-MATI):

The extended material information is an additional specification to the data sheet.

Products with extended material information are **not** approved for direct contact with food. The extended material information only indicates which raw materials are listed with which authorities (e.g. BfR, FDA, (EU) No. 10/2011 Annex I). This information supports the customer in risk assessment and application-related use

An application for direct contact with food is by no means covered.

Declaration of Conformity: Regulation (EC) No. 1935/2004, (EU) No. 10/2011, (EC) No. 2023/2006

Products with a declaration of conformity in accordance with the above-mentioned regulations are tested and approved for direct contact with food.

The product can be used in the applications tested and described in the Declaration of Conformity.

Search F-FO | Festo

19 California Proposition 65 (CP 65)

- California Proposition 65 is a consumer protection law that applies only in the state of California.
- Festo products are industrial and not consumer products, the applicability of the CP 65 is not clearly proven.
- The law lists over 1000 substances that are carcinogenic and/or toxic to reproduction.
- Festo products are components that are installed in machines and systems. Skin contact only occurs during installation and maintenance.
- The prescribed limit values are exposure limits. There is no exposure to hazardous substances with our products and occupational safety is guaranteed.

None of Festo's products contain hazardous substances that could escape and endanger people if used as intended.

20 IMDS database

We do not create an IMDS entry for standard catalog products. These products are not tested or approved for use in an automobile.

An IMDS entry also requires a clear reference to the component and supplier as well as the material used. We cannot guarantee this uniqueness for catalog products and their individual parts, as these are subject to change.

21 Asbestos

Asbestos, for example, is regulated in the REACh Regulation (Annex XVII). This means that its manufacture and use is almost completely banned in the EU.
We confirm that none of our products contain asbestos fibers.

22 (EU) 2017/852 Mercury Regulation

The regulation does not apply to Festo products because our products do not contain mercury.

Mercury is regulated, among other things, in the REACH Regulation (Annex XVII). None of the exemptions apply to our products.

23 Services from Festo

For material-specific customer inquiries that go beyond a statutory declaration or information obligation, we offer an "Extended Material Analysis" and a Full Material Declaration (FMD) for a fee. Such requirements must therefore be the subject of a contract or will be invoiced accordingly as a service.

For further details on this service, please contact your local Technical Support or the Festo Contact Center.

24 General information

Many substances are omnipresent and can contaminate products both via the raw material and the production process.

Festo SE & Co. KG therefore cannot exclude the possibility that traces of the above-mentioned groups of substances are contained in our products.

Further technical information, e.g., regarding possible operating media, can be found in the following document: Techinfo_de.pdf (festo.com