

WP8. Ethics Plan

Task 8.2

Coordination

Deliverable 8.2

Ethics Plan



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ABBREVIATIONS

end-of-life vehicles (ELV), 7
environment, health and safety (EHS), 8
waste electronics and electrical equipment (WEEE), 7

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EXECUTIVE SUMMARY

This deliverable outlines the ethics procedures related to environment, human volunteer activities and specific ethical requirements concerning any research involving the processing of personal data in the PRIMUS project.

The beneficiaries from the PRIMUS consortium confirm compliance with ethical principles and applicable international, EU and national law in the implementation of research activities not originally envisaged (or not described in detail) in the DoA will be ensured. The Consortium also confirms that any ethical concerns raised by those activities will be handled following rigorously the recommendations provided in the European Commission Ethics Self-Assessment Guidelines.

Ethical issues are handled in WP8 Management in Task 8.3 Ethics management (M1-M36, led by VTT). PRIMUS is compliant with EU, international and national ethics requirements and legislation and ensures that the provisions on ethics regulation and rules are implemented into all project activities. Ethical aspects will be considered by all consortium participants and monitored by VTT. This includes assessing and monitoring activities based on possible effects to the environment, safety especially in the laboratories and research facilities, public engagement, gender issue, cooperation with other scientific communities, data handling, storage and management, and innovation and ethical management.

The following issues were identified during the ethics review for PRIMUS. The review also conducted that the issues are not serious and complex, and that the consortium has demonstrated awareness of these issues as well as sufficient measures to manage the ethical issues through the T8.4 and ethics manager also project coordinator Anna Tenhunen-Lunkka.

- 1) Humans
- 2) Personal Data
- 3) Environment, Health and Safety.

The consortium will ensure that all of these 1-3 issues and any additional ethics issues that may emerge in the course of the grant are carefully analysed and managed.

On behalf of Authors

Anna Tenhunen-Lunkka, VTT

PRIMUS PROJECT

PRIMUS project is dedicated to significantly contribute to the goals of the European Strategy for Plastics and enhance the amount of quality and safe recycled plastics that enter the European markets. PRIMUS is a project funded by the Horizon Europe in the following call: *HORIZON-CL4-2021-RESILIENCE-01-10: Paving the way to an increased share of recycled plastics in added value products (RIA)*. PRIMUS is a 3-year project with a total budget of 7 M€. PRIMUS has 10 partners¹, and 2 affiliated entities².

PRIMUS will actively engage with the plastics value chain stakeholders and innovatively develop novel methods and technologies to significantly increase the circularity, and production and use of sustainable, safe and quality recyclates in added value products. The main technological focuses are on advanced mechanical recycling coupled with broad analytics and novel pretreatment methods for removal of hazardous substances and counteracting degradation. PRIMUS will produce 4 demonstrations where new added value products will be made from recycled and upgraded non- or underutilized plastic waste streams from waste electronics and electrical equipment (WEEE) and end-of-life vehicles (ELV). The four demo products will be automotive interior parts, automotive cooling circuits and its elements, a food contact application refrigerator, and a closed-loop demonstration of washing machine seals.

The project aims at establishing EU widely accepted and transparent procedures to control quality and safety of recyclates, especially for the waste streams containing hazardous substances like brominated flame retardants. The framework related work will include broad engagement of the European plastics sector and recyclers, but also the society, citizens and communities as well as consumers. Safety and trackability back to origin, traceability, are consistent and overlapping themes in PRIMUS. PRIMUS will not only technically and industrially support the uptake of recyclates in products but will also address and support the concerns of the society and enhance the uptake of products that have recycled content.

¹ VTT Technical Research Centre of Finland Ltd (coordinator, VTT), Circularise (CIR), Tallinn University (TLU), University of Eastern Finland (UEF), Maier (MAI), Greendelta (GD), Cikautxo (CK), MONDRAGON Corporation (MON), Plastics Recyclers Europe (PRE), and Coolrec (COR).
² CIKATEK R&D and Innovation Centre (of Cikautxo, CKT), Maier Technology Centre (of Maier, MTC).

1 INTRODUCTION

In this report, the key principles and how the PRIMUS operations and actions are executed accordingly are presented. The aim of this report is to underline the compliance of the project activities and tasks in the project with the specific ethic requirements concerning human participants, handling personal data and environment, health and safety (EHS).

Part of the ethics management is the formulation of general ethic procedures and criteria for PRIMUS. The PRIMUS consortium is conscious of the importance of good ethics practices and requirements and is committed to comply with them.

All activities carried out in the PRIMUS project are compliant with applicable EU and national EU member state legislations to ensure the protection and ethical use of personal data.

1.1 Scope of the deliverable

This report outlines the plan for ethical procedures and management for the PRIMUS project.

1.2 Target audience

This report is intended primarily for the PRIMUS consortium, and external stakeholders interested to evaluate the ethical compliance of the project.

1.3 Contributions of partners

The following Table 1 Table 1. Partners' contributions depicts the main contributions from participant partners in the development of this deliverable.

Participant short name	Contributions
VTT	Overall content to the report.

Table 1. Partners' contributions

1.4 Relation to other activities in the project

The following Table 2 depicts the main relationship of this deliverable to other activities (or deliverables) developed within the PRIMUS project and that should be considered along with this document for further understanding of its contents.

Deliverable Number	Contributions
D8.1	This deliverable explains the quality management of the project.
D8.3	This deliverable explains the data management of the project.

Table 2. relation to other activities in the project

1.5 Structure

- **Section 1** : Contains an overview of this document, providing its Scope, Audience, and Structure.
- **Section 2** : Contains the objectives and expected impacts of the deliverable.
- **Section 3** : Contains the ethics compliance management for PRIMUS.
- **Section 4** : Contains the ethical requirements for human participants and processing of personal data.
- **Section 5** : Contains the principles for environment, health and safety management.
- **Section 6** : Contains the conclusions and discussion.

2 OBJECTIVES AND EXPECTED IMPACT

The aim of this report is to underline the compliance of the project activities and tasks in the project with the specific ethic requirements concerning human participants, handling personal data and environment, health and safety (EHS).

Good ethical management and ethical compliance is important to ensure transparent, fair, quality and trustworthy research (research integrity) and research results/outputs of the project. Good EHS management is essential to minimize any potential risks and implement the do no significant harm principle.

3 ETHICS COMPLIANCE MANAGEMENT

Ethical issues are handled in WP8 Management in Task 8.3 Ethics management (M1-M36, led by VTT). Ethical aspects will be considered by all consortium participants and supported by VTT. This includes assessing and monitoring activities based on possible effects to the environment, safety especially in the laboratories and research facilities, public engagement, gender issue, cooperation with other scientific communities, data handling, storage and management, and innovation and ethical management.

Good ethical principles are considered by all consortium partners in all their activities with the support of the project coordinator as part of WP6 coordination and management activities. The project coordinator also monitors the implementation of these ethical guidelines, and any significant issues or deviations will be reported to the PRIMUS General Assembly.

In the PRIMUS project, two types of data are formed and/or collected - both general (research substance related) and personal data.

The ethical procedures forming a sound ethical framework for the PRIMUS project include the following:

1. Ethical criteria for the involvement of humans and the protection of personal data in a way that is aligned with the EU General Data Protection Regulation

(GDPR), Regulation (EU) 2016/678. The minimum ethical requirements for the project activities are described in the following chapters of this document.

2. Implementation of EHS measures.
3. Each work package (WP) leader takes into consideration the ethical framework in their WP activities and reports in project meetings and deliverables the compliance with the ethical guidelines. The project outputs, deliverables and milestones and other reporting and input will be checked and followed by the coordinator to ensure total project compliance. All possible issues will be reported and handled in the General Assembly of the PRIMUS project.

PRIMUS is compliant with EU, international and national ethics requirements and legislation and ensures that the provisions on ethics regulation and rules are implemented into all project activities.

4 HUMAN PARTICIPANTS AND PERSONAL DATA

Project activities are conducted in respect of the fundamental ethical principles, for example according to the ethics principals listed in the following for personal data management and research integrity:

- REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)
- Directive 2002/58/EC on electronic data and e-privacy
- European Code of Conduct for Research Integrity

GDPR is one of the main regulations that are scrutinized to formulate the guidelines to process personal data in PRIMUS. GDPR aims to protect and empower all EU citizens personal data privacy as well as reshape the way organizations across the region manage data and proceed towards data privacy. It is organized around seven key principles (European Commission, 2016):

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimization
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

4.1 Human participants and their recruitment

The human related ethics activities need to be taken into consideration in all work packages as all WPs engage with stakeholders and collect, manage, or validate data that might also be human related data. Especially in WP1, WP5, WP6, WP7 we have identified activities that will involve human participants.

PRIMUS project will involve human volunteers in its project activities for fact-finding and result validation through workshops, webinars, meetings, interviews, and other stakeholder engagement methods. PRIMUS will not carry out experiments to humans, they will be engaged with the project as experts in their fields, or as audience.

Stakeholders involved are mainly from plastics related value chains, and have different roles like recyclers, producing and manufacturing industries like original equipment manufacturers, brand owners, suppliers, RDI institutes, policy and decision makers, public administration and policy makers, NGOs, representative organisations like federations and foundations, consumer representatives, the civil society and consumers. The project is focused on Europe, so the volunteers will be participating in the project from Europe.

The participation and contributions are always voluntary, and participants have the possibility to stop their collaboration at any time, have the right to review any data related to them and also request for any information about them or their contributions to be removed. The data gathering process complies with the applicable laws in the EU including the General Data Protection Regulation (GDPR).

Project partners will aim to ensure the participation of a broad range and representative group of participants from the EU throughout the important different stakeholder groups. The gender equality principles will be applied in the selection of experts and other participants as much as possible. The recruitment of voluntary participants for the project activities will be carried out in different ways and channels:

- The PRIMUS website, newsletters and social media channels are used to promote possibilities and activities throughout signed up members.
- Project partners will actively promote possibilities and activities throughout their networks and social media channels.
- Direct invitations are used to directly approach targeted stakeholders via e-mails or phone calls.
- Project activities and possibilities to participate will be promoted at different conferences, seminars, webinars, and events held or where the project is presented.

PRIMUS is also fully aligned with the Directive 2002/73/EC on the implementation of the principle of equal treatment for men and women as regards access to employment, vocational training and promotion, and working conditions and the EU regulation 1291/2013 on establishing Horizon Europe Article 19 Ethics. To facilitate equal recruitment and opportunities for human participants and any recruitments, the management of the project will aim to eliminate gender bias and inequalities, enhancing work-life balance and promoting equality between women and men in R&I, including the principle of equal pay without discrimination based on sex, in accordance with Articles 2 and 3 of the Treaty on European Union (TEU) and Articles 8 and 157 TFEU. The gender dimension should be integrated in R&I content and followed through at all stages of the research cycle. In addition, the activities under the Programme should aim to eliminate inequalities and promote equality and diversity in all aspects of R&I with regard to age, disability, race and ethnicity, religion or belief, and sexual orientation.

The project shall ensure the effective promotion of equal opportunities for all and the implementation of gender mainstreaming, including the integration of the gender dimension in R&I content. We aim to address the causes of gender imbalance. Particular attention shall be paid to ensuring, to the extent possible, gender balance in evaluation panels and in other relevant advisory bodies such as boards and expert groups.

4.2 Informed consent, legal bases of processing

An informed consent form is collected from participants involved in workshops or interviews where data is collected for purposes of the event on the basis of data subject's consent (GDPR Article 6 a). The consent form and privacy notice are tailored based on the event type, but in general the privacy notice includes information required by GDPR Articles 13 and 14, such as the general information about the PRIMUS project, data controller(s), data processing purpose(s) and methods, legal basis of processing, information on the data privacy protection, confidentiality and voluntariness, processing of personal data and rights of the participants. In case processing of personal data is carried before the event and contact to the participant (e.g. inviting and contacting potential participants), this processing may be based on legitimate interest of the controller(s) (GDPR Article 6 f) provided that this is considered lawful in view of a balance test.

Depending on the type of an event, the participants are requested to give consent. This can be done when they are registering to events (e.g. in workshops) or they are asked to sign an informed consent form (e.g. in interviews). This step is done prior to processing of personal data. The privacy notice is provided. The aim is that each participant is familiar with the project activity and its practices (e.g. that the interviews might be recorded if agreed and notes can be taken), provide them information on what kind of data is collected and what purposes, how any personal data will be handled and also to provide the participants the necessary information for them to make the decision on participation.

4.3 Personal data collection and protection

In the PRIMUS project, personal data is also collected and therefore, *personal data protection* is an important aspect to implement. Personal data is in most cases collected due to people's profession/ employment, and are limited to names, contact details (employer email, phone number) for invitations to events, for example. Relating to the consumer research studies, further demographic details such as age and gender might be collected, but they are not connected to certain participants meaning those details are pseudonymized. Any personal data will be collected and processed at the minimum level possible (data minimization principle). The PRIMUS project does not involve any processing of personal data for commercial purposes.

All personal and identification details obtained from the project activities will be handled according to the legislative requirements and EU GDPR principles. They will be kept confidential and the direct identifiers shall not be published or disclosed in any public documents that may be produced using the data.

Data will be processed in VTT's Microsoft Teams work environment on a secure password-protected private server in the EU and can be accessed only by the dedicated project partners. Substance related research data and personal data will be stored separately. It is however acknowledged that Microsoft Teams may involve transfer of personal data outside of EU/EEA, and therefore the processing of personal data is subject to assessment of requirement of transfer impact assessment (TIA) in view of EDPB recommendations 01/2020 on measures that supplement transfer tools to ensure compliance with the EU level of protection of personal data. Each partner is due to evaluate whether a data protection impact assessment (DPIA) and/or a transfer impact assessment (TIA) is required and to implement the needed assessment(s) and to report the assessment(s) to the coordinator.

All personal data will be deleted or anonymized when it is no longer needed for PRIMUS project purposes. All individuals have the right to access their personal data and ask for removal of personal data and/or withdraw consent at any time. All legitimate users of personal data are bound by confidentiality obligation. All partners handling and involved in using human volunteers' data are accountable for the correct use and storage of data according to the ethics and data management principals set out in the project.

Prior to the commencement of processing of personal data, the project partners commit to clarify their roles in processing of personal data. Where the project partners act as joint controllers in the project, a joint controllership agreement (JCA) shall apply and the arrangement shall be described to the data subjects in the privacy notice. The project partners are fully dedicated to protecting the natural persons and to follow the legislative responsibilities and duties for processing any personal data during the whole project lifetime. The main elements of the protection of personal data guidelines revolve around informing obligation, requesting informed consent from the individual and how the data subject rights are ensured.

The guidelines for personal data follow these steps:

- 1) Procedures for personal data collection and processing;
- 2) Procedures of data storage, protection, retention and destruction.

4.3.1 Data collection and processing

The following matters are always taken into account to follow ethical issues and requirements when collecting and processing personal data:

- The participation and contributions of the volunteers is always voluntary and they have the possibility to stop at any time. The data subjects have the right to review any personal data related to them and also request for any personal data to be erased of them or their contributions. The data gathering process complies with the applicable laws in the EU (GDPR).
 - Processing of direct identifiers is pursued to be limited to cases where :the user contacts PRIMUS through the contact form on the website or via social media, the user asks for further information on a matter of interest (e.g. via email)
 - the user signs up for the PRIMUS newsletter,

- the user replies an online survey or questionnaire,
 - the user takes part in an interview,
 - the user signs up for a workshop or a webinar.
- Data protection, collection and processing details are described in terms & conditions under Privacy Policy-document, which will be formulated once the project starts as part of the Communication and dissemination plan.
- Terms & Conditions, Legal Terms, Privacy Policy, Cookies Policy, Personal Data Management documents will be uploaded on the project website.
- On the PRIMUS website, cookies will only be used to improve website surfing and reduce the time to download web elements. In no event will they be used to gather personal data. The user can always switch off the use of cookies from their web browser. System cookie files can also be deleted without affecting the quality of the website. Only the download speed is affected as the files are no longer in the cache memory.
- The website may possibly at times offer the user technical link devices (links, banners, or buttons), directories and search tools allowing users to access web sites belonging to and/or managed by third parties. PRIMUS does not offer or market on its own or by means of third parties, the services available at the linked sites, or control, exercise supervision or approve the products, services, contents, information, data, files and any other class of material in these linked sites.

The following guidelines will be followed when processing any personal data:

- PRIMUS will processes only personal data that are necessary to achieve the explained purposes:
 - To provide and maintain wanted service like website, contact request, participation in surveys, participation in workshops and webinars, and so on.
 - To notify about changes to PRIMUS's project and possible services (like changes to newsletter).
 - To allow participation in interactive features of PRIMUS project when it is chosen by the person itself (like participating in surveys, interviews, webinars, workshops).
- The PRIMUS partners process personal data to perform statistical analysis so that the PRIMUS products and services can be improved, new products and services can be developed, or the PRIMUS website or social media sites can be improved.
- The PRIMUS partners can process personal data for project marketing purposes, i.e. to provide targeted communications, promotions, offerings, and other advertisements of the project. PRIMUS project will only send communications, promotions, offerings, newsletters and other advertisements via e-mail or other person-to-person electronic communications channels if it has consent from receiver to receiving such communications, newsletters, and other advertisements. Direct contacting (e-mails without consent) of data subject is possible it is ensured with a balancing test that prospecting is targeted and appropriate, there is legitimate

interest, it is quick, easy and clear to unsubscribe or opt-out if wanted (right to object the processing, GDPR Article 21) and the data subject has access to the privacy notice on PRIMUS's website, which will provide an informative reply for GDPR compliance and questions.

- PRIMUS partners process all collected personal data in compliance with legal obligations or to comply with any reasonable request from competent law enforcement agents or representatives, judicial authorities, governmental agencies, or bodies, including competent data protection authorities.

4.3.2 Procedures for data storage, protection, retention and destruction

Data storage and protection is always done with utmost carefulness according to the following principles:

- The PRIMUS partners will take the appropriate technical and organizational measures to keep all personal data safe from unauthorized access or theft as well as accidental loss, tampering or destruction. Such measures and procedures will be disclosed in more detail within the Data Management Plan following the FAIR data principles stipulated by the EU. Access by personnel of the PRIMUS partner companies or their third-party processors will only be on a need-to-know basis and subject to strict confidentiality obligations.
- The PRIMUS partners use Microsoft's Teams Workspace as the intranet/repository to manage, share, and collaborate on the data and documents related to the project. Microsoft Teams enforces team-wide and organization-wide two-factor authentication, single sign-on through Active Directory, and encryption of data in transit and at rest. Files are stored in SharePoint and are backed by SharePoint encryption. The Microsoft Teams SharePoint project workspace is under coordinator VTT's organization account and the data is physically stored in servers in European Union. Therefore, Microsoft Teams follows all the security practices and procedure to assure a safe collaboration working platform. Network communications are encrypted by default using industry-standard encryption techniques such as OAUTH, TLS, Secure Real-Time Transport Protocol (SRTP). In addition, it follows an authentication procedure for the provision of user credentials to a trusted server or service.
- Additionally, Advanced Threat Protection (ATP) is available for Microsoft Teams, along with SharePoint and OneDrive, applications that integrate with Teams for content management. ATP could be an option for the PRIMUS consortium to determine if the content in applications is malicious in nature and block this content from user access.
- Furthermore, PRIMUS can optionally use the Data Loss Prevention (DLP) contained in Microsoft Teams, as well as the larger DLP story for Microsoft 365 or Office 365, specialized in protecting sensitive documents and data. DLP policies promise help users to ensure non-sharing of sensitive data with specific individuals or groups.

The users always have the right to their personal data and can at any time request access to all personal data processed by the PRIMUS partners pertaining to the

individual. The user can modify their communication preferences at any time, as well as exercise the following rights by contacting the PRIMUS personnel or the project via the project general e-mail, which will be set up once the project starts.

- *Right to Access*, allowing the user to consult his/her personal data.
- *Right to Rectification*, allowing the user to modify his/her personal data when they are inaccurate.
- *Right to Erasure*, allowing the user to request that his/her personal data associated with the service be erased.
- *Right to Object*, allowing the user to request that his/her personal data not be processed.
- *Right to Restriction of Processing*, allowing the user to request that his/her data be restricted from processing in the following cases:
 - While the user checks collected of his/her data.
 - When the processing is unlawful, but the user opposes erasure of their data.
 - When PRIMUS does not need to process the user data, but the user needs those data for exercising or defending legal claims.
 - When the user opposes the processing of your data pursuant to a legitimate interest by PRIMUS, pending verification whether the legitimate grounds of the controller override yours.
- *Right to Portability*, allowing the user to receive the personal data they provided in electronic format, as well as to transmit those data to another entity.
- *Right to Withdraw Consent*, giving the user the right to withdraw the consent he granted for the processing of the personal data at any time and via any of the channels indicated below, without affecting the legality of any processing carried out prior to withdrawal.

Even though all efforts are taken to ensure data protection, if there is a breach of information, the breach notification is provided within 72 hours after becoming aware of the data breach (according to the GDPR). Personal data is processed only for as long as necessary for the purposes listed or up until such time where the person withdraws their consent for processing them. The PRIMUS partners will de-identify personal data when they are no longer necessary for the purposes outlined. All remaining collected personal data will be deleted from the project's data storage five years after the end of the project at the latest.

5 ENVIRONMENT, HEALTH AND SAFETY

Experimental work may include elements that require attention to safety in order to ensure safe working conditions for research staff. If e.g. toxic chemicals are used, staff will be provided with adequate training in storing, handling and disposing of such substances.

It is of fundamental importance to PRIMUS that general principles concerning the prevention and protection of workers against occupational accidents and diseases are

carefully assessed and appropriate protective measures as well as mitigation measures are planned and implemented. The assessment covers aspects as prevention of risks, the protection of safety and health, the assessment of risks, the elimination of risks and accident factors, the informing, consultation and balanced participation and training of workers and their representatives.

All partners are dedicated to the following principles to promote prevention:

- avoiding risks,
- evaluating the risks,
- combating the risks at source,
- adapting the work to the individual,
- adapting to technical progress,
- replacing the dangerous by the non- or the less dangerous,
- developing a coherent overall prevention policy within the partners' organisation and PRIMUS project level,
- prioritizing collective protective measures (over individual protective measures),
- giving appropriate instructions to the workers.

The coordinator and the consortium partners will:

- Ensure that the working environment in the workplace complies with the requirements stated in the local/national guidelines/legislation.
- Safeguard the health and safety of all research participants.
- Ensure that all research participants in their organizations will acquire appropriate training for execution of the lab work activities in PRIMUS.
- Follow the environmental regulations with respect to storage, transport, use and disposal of chemicals, according to Material Safety Data Sheet (MSDS) documents.
- Ensure the wear of appropriate protective clothing and equipment (safety goggles, shoes, helmets and masks when required) and the installation of safety alarms and suitable detectors in workplaces where toxic and/or explosive gases can be emitted.
- Ensure that all working staff are well trained and educated about the health and safety matters and procedures and ensure that junior employees will always have senior staff available to guide them.

VTT has established safety principles and procedures (described below). VTT as the coordinator requires that the project partners conducting experimental work implement similar safety principles, while taking into account each organisation's own practices and instructions. Partners that have third parties, linked third parties, subcontracting or contracting are responsible to ensure that they are in compliant with the environment, health and safety guidelines.

VTT's safety principles and procedures

VTT requires a high level of safety in all its operations. Our objectives regarding occupational safety are the following:

1) The development and continuous improvement of occupational safety activities is

part of our strategic planning.

2) VTT has the target of zero accidents.

3) Work at VTT is motivating and the individual's functional ability, resources and development needs are taken into account (physical, psychological and social loading).

4) It is safe and not damaging to health for people to work at VTT's facilities.

We ensure sufficient financial and human resources for taking care of the safety, and support the competence development of the people responsible for the safety. Induction on safety is foreseen for all employees. VTT has a detailed guideline for safety at work and more detailed documents for specific hazardous work stations. We encourage the personnel to bring out all safety observations. We enhance our safety culture in a target-oriented systematic manner, taking into account the principles of continuous development. VTT's personnel has a duty to act according to the safety and security guidelines. The necessary safety and security processes are included in the contracts concluded with the cooperation partners. VTT's and its partners' personnel are obliged to inform their respective superior and VTT's Security Manager or Information Security Manager on any lack, threat or fault in safety and security.

VTT reports on corporate responsibility applying the Global Reporting Initiative guidelines partly. VTT has been ISO14001-certified since 2014. VTT reports also on social responsibility issues according to the GRI Standards 2016. Relevant safety certificates beyond this link: <https://www.vttresearch.com/about-us/sustainable-development>

6 CONCLUSIONS AND DISCUSSION

As part of the ethics management, the principles to underline the compliance of the project activities and tasks in the project with the specific ethic requirements concerning human participants, handling personal data and environment, health and safety (EHS) have been set in this report for the PRIMUS project.

The PRIMUS consortium carries out the project activities in compliance with ethical principles and applicable international, EU and national laws, and has also developed its own guidelines, procedures and measures aiming to support the protection of ethical aspects of research.

Good ethical management and ethical compliance is important to ensure transparent, fair, quality and trustworthy research (research integrity) and research results/outputs of the project. Good EHS management is essential to minimize any potential risks and implement the do no significant harm principle. The PRIMUS consortium is conscious of the importance of good ethics practices and requirements and is committed to comply with them.