

# **Committee Product Policy**

09 / 12 / 2020

# DO'S

#### ENSURE STRICT PERFORMANCE IN AREAS OF:

#### Oversight / supervision:

Have a secretariat representative at each meeting;

- Consult with appropriate counsel on all questions related to competition law;
- Limit meeting discussions to agenda topics;
- Provide each attendee with a copy of this checklist, and have a copy available for reference at all meetings.

#### **Recordkeeping:**

- Have an agenda and minutes which accurately reflect the matters which occur;
- Ensure the review of agendas, minutes and other important documents by appropriate staff or counsel, in advance of distribution;
- Fully describe the purposes, structures and authorities of the groups.

#### Vigilance:

- Protest any discussion or meeting activities which appear to violate this checklist;
- Ask for those activities to be stopped so that appropriate legal check can be made by counsel;
- Disassociate yourself from any such discussion or activities and for the attendees, leave any meeting in which they continue (and have it minuted)

# DONT'S X

#### DO NOT, IN FACT OR APPEARANCE, DISCUSS OR EXCHANGE INFORMATION NOT IN CONFORMITY WITH COMPETITION LAW, INCLUDING FOR EXAMPLE ON:

#### **Prices including:**

- Individual company / industry prices, price changes, price differentials, discounts, allowances, credit terms, etc.
- X Individual company data on costs, production, capacity (other than nameplates capacities), inventories, sales, etc.

#### **Production, including:**

- Plans of individual companies concerning the design, production, distribution or marketing of particular products, including proposed territories or customers;
- Changes in industry production capacity (other than nameplates capacities) or inventories, etc.

#### Transportation rates:

Rates or rate policies for individual shipments, including basing point systems, zone prices, freight, etc.

#### Market procedures, including:

- Company bids on contracts for particular products; company procedures for responding to bid invitations;
- Matters relating to actual or potential individual suppliers or customers that might have the effect of excluding them from any market or influencing the business conduct of firms toward them, etc.
- Blacklist or boycott customers or suppliers

# **A**GENDA

- 9. PFAS Welcome 10. Study on biodegradability and composability 1. Do's and Dont's 11. AOB 2. Approbation of the minutes of the previous meeting 12. Dates MEETINGS NEXT YEAR 3. 13. Tour de Table and agenda 4. Priorities of the participants Chemical strategy for sustainability EU Waste Legislation review new calculation point a)
  - overview of the inDUfed response to the PPWD public b) consultation
- Review Framework Regulation 1935/2004 7.
- Council of Europe Guidance document on FCM 8.



5.

6.

# What is coming? **Major changes**

countries

#### COMMUNICATION

Chemicals – strategy for sustainability (toxic-free EU environment)

- Faster risk management: Generic, essential uses, grouping Strengthen EU legal - Endocrine disruptors framework 5 blocks - Chemical mixtures to address env and - Chemicals in the env. health – PFAS concerns - Safe and Sustainable by One substance, one Safe and design assessment Simplified, sustainable - Non-toxic material cycles by design Coherent, - Methodologies and data legal - Resilience and EU strategic + Innovation - Zero-tolerance to nonframework autonomy compliance - Green & smart transition Legislative + nonlegislative measures Comprehens. Inspire International leadership and globally - Cooperation with third transparent - Data requirements knowledge Knowledge needs - Science/Policy interface



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good





Detailed list with deadlines can be fould in the extra slides

Source: Cefic

# CHEMICAL SUSTAINABILITY STRATEGY

#### Published on 14 October 2020

- Banning the most harmful chemicals in consumer products only essential use allowed
- Cocktail effect of chemicals when assessing risks from chemicals
- Phasing out the use of per-and polyfluoroalkyl substances (PFAS)
- Boosting production and use of chemicals that are safe and sustainable by design, and throughout their life cycle
- EU's resilience of supply and sustainability of critical chemicals
- "One substance one assessment" for the risk and hazard assessment of chemicals
- Leading role globally by championing and promoting high standards and not exporting chemicals banned in the EU
- Grouping of evaluations when substances have similar structure





# Sustainable product policy (legislative)

- Climate-neutral, resource-efficient and circular
- Hazardous chemicals in products
- Recycled content
- Restricting single use
- Carbon and environmental footprint
- EU Ecolabel NOT on packaging!!
- Eco-design directive wider scope (legislative)
- Protection against "green claims" (legislative)



# CIRCULAR ECONOMY ACTION PLAN (2)

## Key value chain – PACKAGING

- Essential requirements for packaging
- Reducing (over)packaging
- Design for re-use and recycling
- Reducing complexity of packaging materials

## Key value chain – plastics

- Microplastics
- Bio-based, biodegradable and compostable



The 2018 review of the Packaging and Packaging Waste Directive 94/62/EC (PPWD) announced a new method of calculating recycling rates.

In April 2019, an Implementing Decision 2019/665 was published detailing the changes.

Calculation point no longer at output sorting centers but inside the recycling operation

• More justification needed for bottom ashes and total market estimations



## What needs to be deducted $\rightarrow$

- Non-targeted materials (if they are not permissible in therecycling operation)
- Waste rejected by the recycling facility (impurities)
  5% per material
- Humidity of the material if it differs from when it is placed on the market
- Non-packaging material (incl. product residue)

# EU WASTE LEGISLATION REVIEW PPWD PUBLIC CONSULTATION

- To the document
- Part 1: adminstrative information
- Part 2: subjective consumer questionnaire
- Part 3: questionnaire for the stakeholders
- PPWD review objectives:
  - Increase design for recycling and reusability
  - Reduce packaging waste generation
  - Increase uptake of recycled content
  - Increase share of reusable packaging
- EPR Guidance
  - Introduces eco-modulation
  - Expected in November 2020 ????



# **POSITION TEXT**

- PART II → subjective and measures the loudest voice. Other questions often written so it is hard to disagree with.
- **Recycled Content** → **not mandatory**: disruption of the established material flows
- Product-Packaging = UNITY: product is more valuable and has more impact when lost
- Packaging must be optimal for use. Function, material, logistics, appeal to consumers, protection, anti-counterfeit, ... All have their rightful place.
- Some MS are already far advanced in the management of packaging waste, targets would create an unlevel playing field as low hanging fruit has already been picked.
- Highlighting the dual system (Fost Plus/Valipac)
  - ✓ → Valipac 80% Re-use/20% recycling
- Recycling above composting: If material can be recycled → waste management steps lower on the scale of Lansinck should be excluded.
- Eco-design: Every every packaging should be designed with the end-of-life aspect in mind as well as the main purpose of the packaging - namely the product it packs and the functions it should provide for that product



# Review Framework Regulation 1935/2004



# REVIEW FRAMEWORK REGULATION 1935/2004

- Now included in the Farm to Fork Strategy!
- Planning remains unchanged





# COUNCIL OF EUROPE – NEW DRAFT RESOLUTION ON FCM

- General way to provide guidance on compliance with art.3 (EU)1935/2004 – use of substances in FCMA
- For all materials not subject to a Harmonised Measure

#### **Approved Substances**

• EU, national and institutional recommendations

#### **Unknown Substances**

- Release value 0,01 mg/kg
- Including: degradation products, impurities,
- Excluding: CMR, nano, genotox (QSAR)  $\rightarrow$  Risk Assessment
- RA  $\rightarrow$  international recognised principles

#### DOC

- Issued by all stages in the Value Chain
- Clear responsabilities for the actors in the value chain assumes responsability or communicate gaps in the RA

#### COUNCIL OF EUROPE



#### CONSEIL DE L'EUROPE

Q2 2021 Guidance on DOC

Technical

Doc P&B

# PFAS

- Per/polyflouroalkylverbindingen
- CF3(CF2)<sub>n</sub>CH2OH
  - ✓ Short chain precursors:  $3 < n \ge 7$  (C<sub>4</sub>-C<sub>7</sub>)
  - ✓ Ultra short chain precursors: C<sub>2</sub>-C<sub>3</sub>





Perfluoroalkyl sulfonate (PFAS)



#### Danish Ban: SCOPE

- PFAS intentionaly used → Functional Barrier
  - Direct: water and heat resistant
  - Indirect: inks of recycled board
- Indicator Value: 20µg/kg → below: unintentional background contamination
- Analysis: TOF DIN EN ISO 10304-1 (D20)

# STUDY ON BIODEGRADABILITY AND COMPOSABILITY

#### Literature study

• Biodegradability and composability of corrugated boxes

#### scope

• Corrugated board and other fiberbased packaging material

#### 9 reports

- Extesive
- Detailed
- Transparent
- Right Focus

#### Goal

• Back up communication on biodegradability and/or compostability of corrugated boxes



# STUDY ON BIODEGRADABILITY AND COMPOSABILITY





# **German FCM-legislation**

- a) Mineral Oil Ordinance
- b) Printing ink Ordinance



# GERMAN MINERAL OIL

- Notified on 17/08/2020 to TRIS  $\rightarrow$  Standstill periode untill 18/11/2020
- No prior consultation of the stakeholders

FOR RECYCLED PAPER ONLY! ALWAYS BARRIER UNLESS

- No transfer to the food: low MOAH concentration
- Appropriate measures to prevent migration
- Food producer doesn't need a barrier

- MOAH Alkylated Aromatic polycyclic C16-C35 one or more ring structure (ex. DIPN)
- MOSH no limit

#### LIMITS





# **GERMAN PRINTING INKS**

# No new TRIS Needed

# German Authorities still working on the Draft





# DOC NEW TEMPLATE COMMISSION

- In support of Regulation 10/2011
  - Relevant for Regularion 282/2008
  - Other materials?
- Template for plastics: procedure as is
  - Future: All materials & First step towards digitalisation



# Structure: 5 sections

- Pre-amble, general and specific rules
- Sections:
  - 1. Identification
  - 2. Compliance information
  - 3. Information for the users of the product (including end-users)
  - 4. Signature
  - 5. Annexes
- · Maximum field lengths
  - to ensure DoC stays relevant, concise and clear
  - to facilitate digital DoC





# **Pre-Amble**

- Rules on the use of the DoC
  - number of characters
  - possibly further administrative rules needed;
- registration number to contact competent authority
- use of sections 2.3 and 2.4 how to use, which substances
- Non-Disclosure Agreements
- Signing
- Digital documents





	DECLARATION of C	OMPLIANCE with RE	GULATION (EU) 10/2011			
	I, the undersigned i	n section 4 declare in	n name of [ADD NAME O	F Manufacturer] as	identified in section 1	.1, that the plastic material
	identified in section	1.2 was produced in	accordance with Regula	tion (EU) No 10/20	11. The product to wh	ich this declaration applies
	is suitable for use in	n contact with food, p	provided it is used in acco	ordance with the re	strictions set out secti	on 3 of this declaration, to
Section 1	which purpose I pro	ovided adequate inst	ructions in this declaration	on, and labelling on	the product.	
	Hereby I declare th	e contents of this de	claration is correct to the	best of my knowle	dge and in compliance	with Regulation (EU) No
	10/2011.					
	Section 1 Identifica	tion				
	1.1 Manufacturer		1.2 Plastic product		1.3 competent author	ority
	1.1.1	50	1.2.1	50	1.3.1	50
	name		tradename /		name	
			designation			
	1.1.2	100	1.2.2	Intermediate	1.3.2 address	100
	address		Production stage	□ final*		
				(check one)		
	1.1.3	50	1.2.3 other info	100	1.3.3 country or	50
	country		identifying the		region	
			product			
			(add image or other			
0) the identity and address of the			additional information			
2) the identity and address of the			to annex in section 5)			
business operator which manufactures or						
mports the plastic materials or articles or						
products from intermediate stages of				C	1.3.4 reg. number	50
heir manufacturing or the substances						
intended for the manufacturing of those	(not	e – section 2 of Ann	ex IV is omitted – is there	really a need for th	nis – can this be done o	differently?)
materials and articles;						2 X
This presentation is intended to	facilitate discussion and	understanding of the m	atters presented. It does not	represent a final posi	tion and does not	and the second s





# Section 2

Section 2: Com	pliance information		
2.1 general			
2.1.1	□ yes	manufacture or the substances i	products from intermediate stages of meet the relevant requirements laid down in 11(5), 15 and 17 of Regulation (EC) No
2.1.2	□ yes □ N/A	confirmation that the material of Article 13(2), (3) and (4) or Artic	d in a multi-layer material or article, the or article complies with the requirements of the 14(2) and (3) of this Regulation.
2.2.1		od with which it is intended to be put in	100
2.2.2	time and temperat with the food;	ture of treatment and storage in contact	100
2.2.3	which compliance	ontact surface area to volume ratio for has been verified in accordance with or equivalent information	100
2.2.4	Limitations on use	in final products	100
2.2.5	Other relevant spe	cifications	100





# Section 2.3/2.4

2.3 Sub	stances (prese	nce) - only l	ist substances subj	ject to specific re	estrictions, in	cluding NIAS if	f so						
Number	FCM No (if any)	CAS Nr (if	Name / other ide	entification /	amount	Unit	Basi	is		Dual use	Nano	)	Table 1 Annex
		any)	NDA code			1: mg/kg f	art.	5					II/ genotoxic
						2:mg/dm <sup>2</sup>	or a	art. 6 **					
						3: mg/kg p							
						4: % w/w							
1			50										
2													
3													
4													
			Add additional st	ubstances as									
			appropriate										
2.4 Sub	stances (comp	liance) - sul	bstance numbers s	hall be the same	as in section	n 2.3							
Number	Aplicable	Aplicable	Compliant with	NDA	S/V	Applicable or	r i	compliant	Other res	trictions in ta	able 1	Compl	iant
	SML	SML (T)	applicable SMLs	information	test	internal puri	ity		of Annex	1			
				available		specification	s						
1			🗆 yes	🗆 yes		100		🗆 yes	100			🗆 yes	
			□ N/A	□ N/A				□ N/A					
2			🗆 yes	🗆 yes				🗆 yes				🗆 yes	
			□ N/A	□ N/A				□ N/A					
3			🗆 yes	🗆 yes				□ yes				🗆 yes	
			□ N/A	□ N/A				DN/A					
4			🗆 yes	🗆 yes				🗆 yes				□ yes	
			□ N/A	□ N/A				□ N/A					<u> </u>
			□ yes	🗆 yes				🗆 yes				🗆 yes	
		1	□ N/A	□ N/A				□ N/A					





# Section 2.5

2.5 adequate	e information not specified in section 2.2, 2.3 or 2.4	
2.5.1	Other adequate information relative to the substances used or products of degradation thereof for which restrictions and/or specifications are set out in Annexes I and II to this Regulation to allow the downstream business operators to ensure compliance with those restrictions;	1000
2.5.2	Other adequate information relative to the substances which are subject to a restriction in food, marked as 'Dual Use' in section 2.3, obtained by experimental data or theoretical calculation about the level of their specific migration and, where appropriate, purity criteria in accordance with Directives 2008/60/EC, 95/45/EC and 2008/84/EC to enable the user of these materials or articles to comply with the relevant EU provisions or, in their absence, with national provisions applicable to food;	1000
2.5.3	Any other information relevant for achieving compliance	1000
2.5.4	Instructions for receiving information under NDA, including address of third party that holds this data, if any – note this information shall always be provided to competent authorities on their request without delay	1000





# Section 3

Section 3: ins	structions and informatio	on to users of the product	
3.1	Instructions to co	onverters – leave fields empt	ty or indicate N/A if none
3.1.1	Maximum use	%	(% recycled material in final/intermediate material, if any maximum)
	(%)		
3.1.2	Restrictions of	500	
	use**		
3.1.3	Other	500	
	instructions		
3.2	Instructions to us	sers further down the supply	chain, including end users – leave fields empty or indicate N/A if
	none		
3.2.1	Restrictions of	500	
	use**		
3.2.2	Summary of	500	
	labelling		
3.2.3	Other	500	
	instructions		





# Section 4 and 5

Section 4: Signature	
4.1 Signature	
(Add Signature, place, company	
stamp)	
4.2 Name of person signing	50
4.3 Date of the declaration	
5 Annexes – in case the maximum	n field length is too short add additional information, please add that to the
annex fields below – add a line fo	r every field.
Field	Information
x.y.z	(unlimited field length, however, per field not more than two pages should be
	used, images/graphs/tables may be added as required)

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THANK YOU FOR YOUR ATTENTION

Meetings 2021

Woe 21/4/2021 Vrij 24/9/2021 Vrij 10/12/2021

• Online/inDUfed?

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# **Extra Slides**



**BACK** 

Key actions to be taken by the Commission	EU legislation	Indicative timing	Support up- and reskilling of the workforce for		As of 2020
Set up a high level roundtable with the purpose		2021	the digital and green transition		here
- of promoting efficiency and effectiveness of			Stronger EU legal framework to address press	ing environmental and health concerns	
chemicals legislation, boosting development			Roadmap to prioritise carcinogenic, mutagenic	REACH (Comitology)	2021
and uptake of innovative safe and sustainable			and reprotoxic substances (CMRs), endocrine		
chemicals, and monitoring the impact of the			disruptors, persistent, bioaccumulative and		
Strategy's actions.			toxic (PBT and very persistent and very		
Innovating for safe and sustainable EU chemic	als		bioaccumulative (vPvB) substances,		
Develop EU safe and sustainable-by-design		2022	immunotoxicants, neurotoxicants, substances		
criteria for chemicals			toxic to specific organs and respiratory sensitisers for (group) restrictions under		
Establish an EU-wide safe and sustainable-by-		2023	REACH		
design support network			Proposals to extend the generic approach to risk	REACH Article (8(2))	2022
Financial support for the development,		As of 2021	management to ensure that consumer products	ALACTI MILLE OD(2)	2022
commercialisation, deployment and uptake of			do not contain chemicals that cause cancers.	Food Contact Materials Regulation	2022
safe and sustainable-by-design substances,			gene mutations, affect the reproductive or the	too comercian regulater	
materials and products			endocrine system, or are persistent and	Cosmetic Products Regulation	2022
Mapping safe and sustainable-by-design skills		2021	bioaccumulative and toxic; assess the	Ū.	
mismatches and competence gaps, and make			modalities and timing to extend the same	Toy Safety Directive	2022
recommendations			approach to further chemicals including those		
Establish Key Performance Indicators to		2021	affecting the immune, neurological or	Legislative route for other consumer	
measure the industrial transition towards the			respiratory systems and chemicals toxic to a	products (e.g. detergents) to be	
production of safe and sustainable chemicals			specific organ	identified by the impact assessment	
Introduce legal requirements on the presence of	(Upcoming) Sustainable products	2021-2022	Proposal to amend REACH Article 68(2) to	REACH	2022
substances of concern in products, including			include professional users		
PFAS, through the initiative on sustainable			Introduce mandatory legal requirements under	REACH (Comitology)	2022
products			the General Product Safety Directive and restrictions in REACH to enhance the safety of		
Initiatives and funding to promote the		As of 2021	children from hazardous chemicals in childcare	General Product Safety Directive	2021
development of green and smart technologies.			articles and other products for children (other	General Product Safety Directive	2021
advanced materials, and innovative business			than toys)		
models for the low-carbon and low			In the process of the upcoming Strategic	Strategic Framework for Health and	2021
environmental impact industrial production and			Framework for Health and Safety at work,	Safety at work	
use of chemicals			define further priorities for addressing workers'		
Access to risk finance, in particular for SMEs		As of 2021	exposure to hazardous substances, including by		
and start-ups			identifying most harmful substances for which		
Make amendments to the EU legislation on	Industrial emissions Directive	2021 E	the Commission will propose to set		
industrial emissions to promote the use of safer			occupational limit following the established		
chemicals by EU industry			consultation process in the area of health and		
Identify key value chains and dependencies		As of 2021	safety at work		
where chemicals are important building blocks			In consultation with social partners, strengthen		2022
and engage with stakeholders to increase the			protection of workers, notably by proposing	at work Directive	
EU's strategic foresight on chemicals			lowering existing occupational limit values for lead and asbestos as well as establishing a		
Promote interregional collaboration along		As of 2021	binding limit value for di-isocyanates		
sustainable chemicals value chains, through			Define criteria for essential uses, taking into		2021-22
smart specialisation, to accelerate the			account the definition of the Montreal Protocol		2021-22
development of joint investment projects			Proposal to amend the CLP Regulation to	CLP Regulation	2021
			repose to marino un our regulation to	and the Dimeter	



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introduce new hazard classes on endocrine disruptors, PBTs/vPvBs and persistent and mobile substances, and apply them across all legislation		
Update information requirements to allow the identification of endocrine disruptors in	REACH (Comitology)	2022
relevant legislation, particularly under REACH, legislation on cosmetic products, food contact	Biocidal Products Regulation (Annexes)	2021
materials, plant protection products and biocidal products	Plant Protection Products Regulation (Commission Communications)	2021
	Food Contact Materials Regulation	2022
	Cosmetic Products Regulation	2022
Assess how best and introduce (a) mixture assessment factor(s) in Annex I of REACH	REACH (Comitology)	2022
Introduce or reinforce provisions to take account of the combination effects of chemicals in water, food contact materials, food additives, toys, detergents, cosmetics	Environmental Quality Standards Directive/Ground Water Directive (Annexes)	2022
iejo, ettegano, etantato	Food contact materials Regulation	2022
	Food additives Commission Regulation (Comitology)	2022
	Detergents Regulation	2022
	Toy Safety Directive	2022
	Cosmetic Products Regulation	2022
Proposal to amend REACH Article 57 to add endocrine disruptors, persistent, mobile and toxic (PMT) and very persistent and very mobile (vPvM) substances to the list of substances of very high concern	REACH	2022
Proposal to restrict PFAS under REACH for all non-essential uses including in consumer products	REACH (Comitology)	2022-24
Review of the annexes of the Environmental Quality Standards Directive and of the Groundwater Directive to add PFAS where possible as a group	Environmental Quality Standards Directive/Groundwater Directive (Annexes)	2022
Address the presence of PFAS in food by introducing limits in the legislation on food contaminants	Food Contaminants Commission Regulation (Comitology)	2022
Proposal to revise the legislation on industrial emissions and the European Pollutant Release	Industrial emissions Directive	2021

and Transfer Register to address emissions and	1	
reporting of PFAS from industrial plants		h
Proposal to address the emissions of PFAS from the waste stage including through the revision of the legislation on sewage sludge	Sewage Sludge Directive	2023
Proposals under the Stockholm Convention and the Basel Convention to address PFAS concerns at a global scale		2023-2024
EU-wide approach and financial support for innovative solutions to remediate contamination with PFAS		As of 2020
Simplification and consolidation of the legal fit	ramework	
Establishment of a 'One substance, one assessment' process to coordinate the hazard/risk assessment on chemicals across chemical legislation, through the use of a single Public Authorities Coordination Tool, an expert group and a Commission coordination mechanism		As of 2021
Horizontal proposal for reallocation of EU technical and scientific work on chemicals to the EU agencies		2022
Proposal for a founding regulation for the European Chemicals Agency		2023
Proposal to amend CLP Regulation to give the Commission the mandate to initiate harmonised classification		2021
Review of the definition of nanomaterial		2021
Proposal to revise the REACH authorisation and restriction processes	REACH	2022
Establishment of a EU repository of human and environmental health-based limit values		2022
Establishment of an open platform on chemical safety data and tools for accessing relevant academic data		2023
Horizontal proposal to remove legislative obstacles for re-use of data, to streamline the data flow across legislation and to extend the open data and transparency principles from the EU food safety sector to other pieces of chemical legislation		2023
Proposals to allow EU and national authorities to commission testing and monitoring of substances as part of the regulatory framework		2023
Development of an indicator framework on chemicals		2024
	REACH	

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European Audit Capacity		
Amend REACH to ensure compliance checks on all registrations of substances under REACH and to allow for the revocation of registration numbers		2022
Proposal to extend OLAF's scope of action to investigations on the circulation of illicit chemical products in the EU		2022
Proposals for implementing acts under the Market Surveillance Regulation to set uniform conditions and frequency of checks for certain products	Market Surveillance Regulation	2022-23
Providing a comprehensive and transparent k	nowledge base on chemicals	
Proposals to revise requirements for registration in REACH to ensure: the identification of substances with critical hazard properties, including effects on the nervous and immune systems, the move towards grouping approaches, the registration of a sub-set of polymers, information on the overall environmental footprint of chemicals, the obligation of chemical safety reports for substances between 1-10 tonnes		2022
Develop a strategic research and innovation agenda for chemicals		2022
Fund EU-wide human and environmental (bio)monitoring		As of 2020
Establish an EU Chemical Early Warning and Action System		2023
Provide a model inspiring chemicals managem		
Initiatives with international organisations and industry to promote the use of the UN GHS internationally		As of 2020
Proposal at the UN GHS level to introduce, adapt or clarify criteria/hazard classes in line with the CLP Regulation		2022-24
Support, in particular through funding, to build the capacity of third countries to assess and manage chemicals		2020-2022
Ensure that hazardous chemicals banned in the European Union are not produced for export including by amending relevant legislation if and as needed.		2023
Promote due diligence in the sustainable production and use of chemicals in the future initiative on sustainable corporate governance		2020-2024

