



Committee Product Policy

Teams-meeting

09/12/2020

10:00-12:30

Minutes

Aanwezigen: Chris Geers (Sappi), Diane Houtmeyers (SK Turnhout), Wim Van Asbroeck (SK Van Mierlo), Erwin Heeren (DuCaju), Séverine Schott (AR Metallizing), Piet Wille (Stora Enso), Michel Wambacq (VPK Paper), Brian Ameys (Mondi), Bart Lambrigts (DS Smith), Willem van Veen (inDUfed)

- 1. Welcome**
- 2. Do's and Don'ts**
- 3. Approbation of the minutes of the previous meeting and agenda**

The minutes of the previous meeting are approved.

- 4. Priorities of the participants**
- 5. Chemical strategy for sustainability**

The ambition and scope of the new strategy: use of chemicals in food contact materials is deeply embedded in it and new measures are expected. One such measure is the introduction of “one substance one assessment” approach, somehow combining the work of ECHA on hazard assessment and EFSA risk assessment for food contact. Another measure is the combined evaluation of groups of substances with similar characteristics. This could lead to a more hazard-based approach rather than a risk based one.

The implementation of this strategy and the subsequential changes in the legislation will have a major influence on our business in the coming years.



6. EU Waste Legislation review

a. new calculation point

The review of the Waste Framework directive resulted in a new calculation point for the recycling of packaging, being the final recycling process (eg for paper recycling – the pulper). Subsequently the method of calculating the recycling rate must be revised. This work is done at Fost Plus and the IVCIE.

b. overview of the inDUfed response to the PPWD public consultation

The document was not discussed. A proposal will be circulated to the members for approval.

7. Review Framework Regulation 1935/2004

The review of the framework Regulation is still on track. However the different initiatives, like the Farm-to-Fork strategy, the CSS (see point 5) and the fact the the impact assessment is still to be commenced, makes the deadline of adopting a new legislation by Q4-2022 unattainable.

In the Farm-to-Fork strategy Food packaging is now recognized as an instrument to battle food loss.

8. Council of Europe – Guidance document on FCM

A new draft resolution on the safety and quality of Food contact materials was published. It provides a general way on how to deal with article 3 of the framework regulation for all food contact materials. If no release value is defined, then a limit is applied. Exception are the genotoxic substances, which must be risk assessed. The industry can risk assess but the procedures need defining.

Two guidance documents are expected in 2021. One of them dealing with the Declaration of Compliance (DoC). The second one giving a technical guidance on paper & board.

- Action: circulate the Guidance document to the members



9. PFAS

PFAS in one of the grouped substances that are now under discussion to be restricted.

The Danish ban was explained. Intentionally added PFAS are prohibited unless a functional barrier is used (direct and indirect use is in the scope, as well as the use of recycled fibers). The indicator value is 20µg/kg food.

- Action: the summary on the PFAS ban in Denmark will be circulated.
- Action: All information members have on PFAS in their products is kindly asked to be send to inDUfed as this contains important backup information on the subject. All information send will be used in a strict confidential way.

10. Study on biodegradability and composability

Fefco has done a study on biodegradability and compostability of corrugated board. It was a literature study where 9 different studies were compared. The conclusion is that corrugated board is compostable and biodegradable.

The aim of the study is to back up the previous statement with a substantial argument.

- Action: circulate the study to the concerned members (only corrugated)

11. AOB

a. German MOH-ordinance

The new MOH ordinance was notified to EU and the member states via TRIS. During the stand still period the EU, Spain and the Netherlands issued commends (NL even a detail opinion). The stand still period is prolonged with three months because of these commends.



b. German Printing Inks-ordinance

There is a new version from May 2020, which has no significant change compared to the 2016 version. It is unclear if re-notification to the EU is needed. In Germany an interservices consultation is ongoing.

c. New template DoC – Plastics Regulation

The European Commission is working on a new template of the DoC (Declaration of Compliance) to be used in the Plastics Regulation. The goal of DG SANTE is to use this template in the future for all materials. They also see this new template as a first step towards a digitalisation of the DoC. The work here is important for us in the long run. A meeting for the Belgian members of inDUFed will be organised by the end of January.

- Action: send Doodle to set a date for the DoC-meeting.

12. Dates MEETING 2021

- Wed 21/4/2021
- Fri 24/9/2021
- Fri 10/12/2021