



Committee Product Policy

Teams-meeting

18/09/2020

10:00-12:30

Verslag

Aanwezigen: Chris Geers (Sappi), Diane Houtmeyers (SK Turnhout), Wim Van Asbroeck (SK Van Mierlo), Erwin Heeren (DuCaju), Séverine Schott (AR Metallizing), Christine Etienne (inDUfed), arc Bailli (inDUfed), Willem van Veen (inDUfed)

1. Welcome
2. Do's and Don'ts
3. Approbation of the minutes of the previous meeting and agenda
No remarks were given on the minutes of the previous meeting.
4. Priorities of the participants
5. Review Framework Regulation 1935/2007: Ecorys Report

The Ecorys-report on the review of the framework regulation on FCM (EC 1935/2004) was published. A brief overview was given. The main conclusions for P&B are:

- P&B is one of the priority materials to harmonize
- A connection between REACH and lists in FCM-legislation is missing
- NIAS & cocktail effect are missing in the legislation

The PIJITF-proposal offers many solutions to the main part of the problems identified in the report. Now even more so than when PIJITF took the initiative to develop the position (2016 first notification of the German Printing ink ordinance).



6. German FCM-legislation

a. Mineral Oil Ordinance

Germany has notified the long awaited MOH-ordinance through a TRIS procedure. The period for MS to issue commentaries end mid-November.

The main remarks from industry are:

- Many sources of MOH exist
- Not all MOH pose a risk. The 3-7 ring aromatic hydrocarbons have to have the focus.
- A holistic overarching approach in the complete value chain is needed to tackle the problem
- Many measures have already been taken to remediate the problem

b. Mineral Oil benchmark Values

Also in German a new benchmark value for the food producing industry on MOH was introduced. Next to the already existing values a new one for nuts, oilseeds, coconut, peanuts and dried fruit and mixtures thereof was established: 4 mg/kg MOSH/LOQ (MOAH)

c. Printing ink Ordinance

Germany has re-issued its printing inks ordinance. This time they did not notify it in a TRIS procedure. Since its re-issuing, it is very quiet around this ordinance. The new text exists only in English, but it is understood that no major changes were done compared to the previous version. All our remarks stay valid.



7. Reach: Art 33. + SCIP-DB

All products where a SVHC is present in a concentration $>0,1w\%$ need to be registered in the SCIP-Database. This DB is a result of the changes in the Waste Framework Directive and conceived by ECHA. The products that need to be registered are the same as those were according to article 33 of the REACH-regulation a communication is needed towards the customers.

8. Date NEXT MEETING

The next meeting of the Product Policy committee will be held on: 9/12.