



# CITPA Joint Product Safety & Environment Committee

<b>Date and time</b>	<b>30 April 2020, 13.00 – 16:00</b>
<b>Location</b>	<b>Web-meeting</b>
<b>Circulation</b>	<b>Environment &amp; Product Safety Committee Members</b>

## Minutes

### Participants

Azens, Jean Jacques	COF
Barnetson, Andy	CPI
Borba, Teresa	Apigraf
Cardon, Jan	ECMA
Coward, Richard	CITPA President
Hitchin, Tony	ProCarton
Hunger, Karsten	ECTA
Johansson, Kennert	CEPI Eurokraft
Kerninon, Catherine	Eurosac
Stemmer-Letnik, Ute	MM karton
Traussnig, Heinz	MM Karton
Turner, Mike	ECMA
Vailati, Italo	Assografici
van Veen, Willem	Belgian Association Corrugated
Widermann, Martin	PROPAK
<b>CITPA</b>	
Kazashka, Krassimira	CITPA Director/ Chair Environment
Kloeck, Johanna	CITPA Assistant

## ENVIRONMENT

### 1) Welcome and approval of the Joint Agenda

Krassimira Kazashka welcomed the participants and Ute Stemmer-Letnik as a new member of the Committee replacing Heinz Traussnig. The agenda was approved.

Special note: CITPA thanks Heinz for his dedication and support over the years. His knowledge and efforts were an inspiration for many members.

### 2) Approval of the Minutes of the Meeting of 30 November 2019

Members approved the minutes of the previous meeting without comments.

### 3) COVID – 19 situation and actions

CITPA took quick action in seeking support from the Commission for the transport of raw materials and packaging and to classify the packaging industry as essential activity.



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On 18 March, a statement was sent to the Commission and a press release was issued. CITPA secretariat received a reply from the Commission which was shared with members.

On 27 March a broader statement was issued including the packaging & printing supply chain. This was because the inks industry had reported challenges in finding raw materials.

Members discussed about problems with inks concerning availability of 'solvents'. Mike Turner reported that there had been some issues with ECMA members. Martin Widermann informed about problems with availability as well. Karsten Hunger reported that some converters were having problems.

Krassimira Kazashka reported that the Commission created a coronavirus response team led by Ursula van der Leyen. The Commission issued series of guidelines to support the countries and ensure coordinated response to the crisis.

## 4) EU Green deal

The green deal remains a top priority for the Commission and we see it as an opportunity for our industry.

Krassimira Kazashka reviewed the priorities that CITPA members had agreed at the previous meeting and provided an update on each of them:

- **EU climate law** - applies to all sectors, climate neutrality means 'net zero', i.e. carbon emissions should be offset by natural or other sinks.
- **EU Industrial strategy** - a twin transformation: ecological and digital.
- **EU SME strategy** - enforcing the late payments directive and high level SME envoy.
- **Single Market Strategy** – targeting to prevent trade barriers.
- **Farm to fork strategy** - CITPA responded to public consultation with printing & packaging value chain.
- **Chemicals strategy for sustainability** - the European Parliament is busy on a motion for resolution at the moment. CITPA members will evaluate if action needs to be taken together with ACE and CEPI.

## Circular Economy Action plan

CITPA follows closely the priorities agreed at the web-meeting in March. Members discussed some of the measures proposed by the Commission:

- **Restricting single use** –one of the most dangerous for us as industry, we need to keep watching it closely and be attentive to how it is formulated. There will not be 'one' new directive, it will be tackled by existing packaging waste or product legislation.
- **EU Ecolabel** – confirmed that it is not for packaging.
- **Protection against green claims (legislative)** – this will impact all sectors who have an LCA and calculate carbon footprint. The Commission wants to make legally binding rules on green claims based on Product Environmental Footprint approach (PEF).



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Members discussed and agreed that this is critical for paper packaging and we need to prepare well our position.

### **Actions:**

- Evaluate the CITPA methodology vs PEF requirements. Share the costs between FEFCO, EUROSAC, PROCARTON, CEPI Eurokraft.
- Raise the issue at the Environmental Issue group (CEPI) and seek cooperation.

### **5) Single use plastic (SUP) directive**

**CITPA interview with consultants** – the task force prepared well for the interview and the discussion was positive, the end result not fully satisfactory.

**EU workshop (3 April 2020)** - new draft EU guidelines on the scope of the SUPD released causing a huge concern among the paper sector. The suggested interpretation could define cellulose as chemically modified polymer, hence many more paper products would fall in the scope of the SUP Directive.

CITPA members took urgent actions in cooperation with the paper value chain:

- Technical document concerning cellulose (sent to Commission 17 April)
- Joint SUP statement simplified (sent to Commission and available on website)

Next steps are further coordination and national lobby.

**Tour de table** – Members reported about the national lobby actions:

- Belgium (Willem van Veen) – SUP position sent responsible governments. Feedback was received from Flemish cabinet.
- Austria (Martin Widermann) – SUP position shared with ministry, who “understands” the concern. Discussion on paper cigarette packaging picking up. Commission wanted SUP label on outside of case, creates issues with the size of health warning.
- Italy (Italo Vailati) – cellulose is a natural polymer. It was decided last year in Italy to apply a second tax on all packaging that contains plastic but not if recycled or composted.
- Germany (Karsten Hunger) - plastic tax expected to be enforced in Germany. Converting industry association sent the SUP position to national government, no feedback so far. NGOs are active with a firm position on paper products containing polymer to be considered plastic.
- France (Catherine Kerninon) - France is introducing a threshold limit for paper cups containing above 15% polymer.

Members discussed the threshold approach used in France and concluded that other countries may follow it. However, this is not a preferential approach for paper product and the limits once set usually tend to be reduced over and over again.



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## 6) Update on EPRC

Jan Cardon reported that EURIC is again an member of EPRC. During Covid-19, a problem with waste collection for recycled paper was identified. EPRC issues a statement. However, the issue is now resolved.

### **Recyclability guideline.**

There is no endorsement yet by the EPRC platform. The document was developed through the perspective of CEPI/ CITPA. An idea is to develop document that could be endorsed, the discussion is ongoing.

**Action:** CITPA to share the EPRC press release on waste collection.

## 7) EU Waste legislation

### **Essential requirements review**

The Commission will start the impact assessment, a public consultation is expected in May/June.

Members discussed the leaked draft which makes suggestion for possible future policy options. It also defines some paper packaging as problematic, which is needs to be further discussed and tackled. The Commission agreed to develop CITPA position on the policy option and work with CEPI/ACE for a joint statement.

**Action:** CITPA members to discuss the policy options in a web-meeting on 20 May 2020.

### **Extended Producer Responsibility (EPR)**

The Commission is expected to public the EPR Guidance on eco-modulation in June. The Consultant (Eunomia) report is expected end April/May.

Members agreed to collect information on the EPR systems in the countries regarding paper packaging.

CITPA considers a joint industry position to be developed. So far CITPA members support this. The joint position will be agreed with ACE and CEPI.

### **Actions:**

- CITPA will draft a questionnaire to collect information on EPR.
- Members will respond to the questionnaire within a month.

8) Overview activities CITPA members – not discussed.

9) AOB concerning Environmental matters – none.



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## PRODUCT SAFETY

### New chairman

Krassimira Kazashka informed members that Willem van Veen is the new chairman of the Product Safety Committee and congratulated him for accepting the position.

### 1) Review Framework Regulation 1935/2007

The Ecorys report is delayed. They need to do an impact assessment (IA) on policy options. There is a new timeline:

- Public consultation on policy options Mid 2020
- Impact assessment – usually runs for a year (Q4/ 2020 – Q4/2021)
- Final report of Ecorys evaluation and the staff working documents is then foreseen for 2022

As a sector we need to answer the question if we want the framework regulation to be opened for a full or partial review, and what CITPA would like to see changed. Other people can also make proposition to make changes.

**Action:** A small task force was formed. Members are Willem van Veen, Martin Widermann, Ute Stemmer-Letnik, Jan Cardon, Italo Vailati, Krassimira Kazashka

### 2) Report from the FCCG

A first update of the food contact guidelines is planned and it is be available as a corrigendum to the digital version.

The national translations of the Food Contact Guidelines (FCG) are ongoing. FCCG will send a questionnaire to evaluate the implementation of the FCG once more national languages are available.

A new GMP guidance as umbrella document will not be developed. Members preferred to maintain the existing sectoral guidelines.

### 3) Update on Council of Europe

Two documents were published for a public consultation:

- Guiding principles for food contact materials
- Technical guide on paper and board

CITPA didn't issue a joint response and relayed on the members to comment individually. ECMA, inDUfed & FEFCO did respond to the consultation, so did CEPI.

Heinz Traussnig reported that a new draft had been received. Restrictions for some chemicals may be very strict. This is one of the remarks made in the responses to the consultation.



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## 4) Packaging Ink Joint Industry Taskforce

Krassimira Kazashka was elected as the new chairwoman.

The PIJTIF position on printed food contact material is being updated:

- By adding a cover page to bring it up to date with EU policy discussions like the EU Green Deal/ Circular Action Plan. It will also bring the approach proposed into context applicable for all food contact materials.
- A new phrase on the compliance control by competent authorities is necessary to replace the "third parties" notion currently in the text.

A new project is starting to develop a paper on hazard vs risk assessment for food contact materials.

**Transparency questionnaire** – Good feedback received to represent all stages of the value chain.

### **German Printing Inks Ordinance**

Germany is going forward with a new draft of the Printing Ink Ordinance (only in German at the moment). The stakeholders have until end of May to comment. Ute Stemmer-Letnik reported that preliminary evaluation shows only small changes to the previous version (2016), it seems comments from the countries provided at that time have not been included.

**Action:** Send document to CITPA members

## 5) Cross sector Group on Food Contact Materials & Articles

The group is discussing the strategy and objectives going forward. The overall ambition is to use the power of the united industry voice on food contact materials & articles to ensure a pragmatic approach in the EU legislation review.

## 6) Update on projects

- a. Harmonised questionnaire – project continues.
- b. Substances of interest - every year the ECHA lists are updated. The substances discussed have been added since January this year.

**Action:** CITPA will share regular updates with the committee.

## 7) AOB concerning product safety

The date of the next meeting is 12 November 2020, location to be confirmed.