



CITPA Joint Product Safety & Environment Committee

Date and time	22 November 2021, 13.00 – 17:00
Location	Web-meeting
Circulation	Environment & Product Safety Committee Members

Minutes

Participants

Barnetson, Andrew	Confederation of Paper Industries
Bellè, Antonio	Eurosac (consultant)
Cardon, Jan	ECMA
Coward, Richard	President
Gordon, Elin	CEPI Eurokraft
Greigeritsch, Thomas	MM Karton
Hunger, Karsten	ECTA
Kerninon, Catherine	Eurosac/ Internal auditor
Muehling, Winnie	ProCarton
Rantanen, Matti	FEPE
Turner, Mike	ECMA
Stemmer-Letnik, Ute	MM Karton
Van Veen, Willem	CBA/ Product Safety Chairman
Widermann, Martin	ProPak

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Despotou, Eleni	Secretary General
Kazashka, Krassimira	Director
Kloeck, Johanna	Assistant
Gallego, Hana	Trainee

The presentation is part of the minutes.

ENVIRONMENT

1) Welcome and approval of the Joint Agenda

Krassimira Kazashka welcomed the participants to the online meeting and explained the compliance rules. A tour de table followed to introduce the new participants. The agenda was approved.

2) Approval of the Minutes of the Meeting of 21 April 2021

Members approved the minutes of the previous meeting without comments.

3) EU Green deal and Circular Economy Action Plan

a. European Climate Law and Fit for 55 – see presentation

Hana Gallego outlines the updates regarding the adoption of the European Climate Law and the publishing of the Fit for 55. Specific information was provided on the LULUCF, Renewable Energy Directive and Energy Taxation Directive.

Participants asked what the current percentage of renewable energy use in Europe is. Eleni Despotou informed it makes up about 20% of Europe's energy source.



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b. Sustainable Products Initiative

The initiative's goal is to encourage more sustainable products, for the moment CITPA is unsure whether packaging will be included.

Krassimira Kazashka reported on the leaked documents from consultant Trinomics regarding the SPI. The documents frame single-use products as non-sustainable and set new requirements such as the Digital Product Passport. Advocacy actions with the value chain are ongoing.

Action: *Share Trinomics' leaked draft with members.*

c. EU Forest Strategy and Deforestation

Hana reported on the legislative updates on these two legislations and stressed that the Deforestation and Forest Degradation proposal includes paper products under its scope.

Members discussed whether the deforestation legislation had any relation to the Timber Regulation. Cepi tends to follow these legislations. Given this, and the fact that the deforestation document was only just published last week, CITPA will need time to evaluate the proposal.

Action: *CITPA will thoroughly evaluate the Deforestation and Forest Degradation proposal and links to the existing Timber Regulation and will prepare a summary.*

4) EU Waste legislation

This is a very critical issue for CITPA members and CITPA follows it closely.

a. Packaging & Packaging Waste review

CITPA was actively engaged with this file over the course of 2021. Participated in the Enomia workshops in June and provided feedback to the Commission/consultant.

Mike Turner enquired as to whether a Directive or a Regulation would be more advantageous. Participants discussed that, while both have their pros and cons, a regulation might allow for better harmonisation.

Action: *CITPA will share the SWOT analysis prepared by European.*

b. Waste Framework review - the revision is postponed to 2023.

c. Food waste targets

The inception impact assessment recently published by the European Commission regarding food waste targets within the Waste Framework Directive was outlined. FEFCO and ECMA responded to the public consultation.

d. JRC study on the definition of recycling

Krassimira informed on the new JRC study regarding the definition of recycling, specifically mentioning the impact this could have on future legislations.



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5) Single use plastic directive - guidance

Update on the progression of the SUPD. Guidance on scope was published in May 2021, other guidelines are expected on the calculation of plastic content, beverage bottles, and more. CITPA paper published on this in June 2021.

Members agreed to create an overview on how the Directive is implemented/transposed into national law.

Actions:

- *Questionnaire to be sent to members to collect information on the national transpositions of the SUPD.*
- *Task force to be developed to draft the questionnaire. Willem and Mike volunteered to participate.*
- *Resend CITPA paper to members concerning scope.*

6) CITPA methodology for carbon footprint calculation

CITPA methodology is broadly aligned with the GHG protocol according to internal consultant (Michael Sturges), however this is not an official validation. Only an external peer reviewer could provide an official validation. Three offers have been received thus far.

Members agreed that a peer review is necessary to maintain credibility for the methodology.

Actions:

- *CITPA to commission peer review validation of CITPA methodology vs GHG protocol.*
- *CITPA will remind CEPI about the biogenic issue request regarding the update of PEF for intermediate paper.*

7) Update on EPRC

Jan Cardon reported on the last meeting of the EPRC. A guest speaker from the Commission announced that they will look into prioritisation of waste streams for the End of Waste criteria. The EPRC monitoring report is available and the new Paper Declaration for 2021 is being drafted.

The 4evergreen alliance was discussed at the meeting. The workstreams of the group were outlined and participants were encouraged to engage in the 4evergreen event on 30 November.

8) Update on PPCG and new informal "Fibre Packaging Coalition"

Eleni Despotou informed about the formation of the Fibre Packaging Coalition and the topics the group will deal with. The primary aim is high level political outreach at EU level.

Members discussed whether CITPA would want to be involved directly or whether representation through members (FEFCO, ECMA, ProCarton) would be enough.

One limitation factor is the annual fee of 25,000 euro being impossible to cover via the CITPA budget. The interests of converters are well-represented already.



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Some associations expressed that the make-up of the coalition is confusing and the purpose is unclear, and stressed that the work the coalition plans to do was already being done by CITPA members.

The Committee agreed that this issue should be discussed at Board level. The recommendation from the Committee is to wait and observe, then re-discuss it at the April 2022 meeting.

9) Tour de table - activities CITPA members

Action: CITPA to organise an extraordinary meeting in January to share member activities.

10) AOB concerning environmental matters

- a. **ISO developments** – nothing new, report will be made by mail after the meeting.

PRODUCT SAFETY

1) Approval of the Minutes of the Meeting of 21 April 2021

Members approved the minutes of the previous meeting without comments.

2) German ordinances on mineral oil & printing inks

Krassimira reported that after the German government notified the WTO in March 2021, CITPA and Cepi sent letters targeting countries outside the EU. The German provided identical response to all organisation providing feedback. The ordinance will likely continue to move forward.

The printing inks ordinance is expected to be adopted in November 2021. The ordinance envisages a transition period of 4 years, which could be extended to 6 years if the proposal from the economics ministry is accepted. PIJITIF is planning on sending a letter to the Commission regarding printed food contact materials and the ordinance's impact on them.

Ute Stemmer gave an update on the French law on mineral oil coming into force in January 2022. The scope is expected to be everything that is applied on packaging. The draft will be notified to EU via the TRIS and the implementation will be probably delayed.

Action: FEFCO and ECMA to discuss individually and propose common position to CITPA on mineral oil.

3) Review Framework Regulation 1935/2007 - public consultation delayed again.

4) Chemical Strategy for Sustainability

Willem van Veen explained the major issues for converters within the Strategy:

- Substances of concern (SOC) – no way to know how many chemicals will be included here; will have crucial impact.



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- One-substance-one-assessment (OSOA) – could either be very broad or very narrow scope; broad would be an issue if a ban is established for SOC overall.
- Essential use – risk can only be tolerated if it is deemed to be of essential use. The definition of essential use will be key and its possible expansion to products.
- Grouping of substances – proposal by some Member States to ban all PFAS.
- Registration of polymers – increasingly on ECHA's radar and are in the scope of the Strategy.

Action: *Extra-ordinary meeting to be organised to discuss position and strategy on this topic.*

a) Safe and sustainable by design

Krassimira reported on the Safe and Sustainable by Design initiative, which is part of the Chemical Strategy. It applies to materials and products but it is yet unclear if packaging would be included. One interpretation is that 'products' just refers to chemical products, not all products. CITPA will continue following this for update.

b) Substance identification project

Willem outlined the new project from Cepi investigating substances used in paper-making and asked whether CITPA wanted to take on a similar project. The goal would be to identify substances used in the converting process and determine whether they can be substituted or are essential. Topic to be discussed further.

Action: *Organise extra-ordinary meeting of the Product Safety group in January.*

5) Report from the FCCG

Jan reported that the last FCCG was cancelled and no new date was announced. At the same time, the Food Packaging Forum has created a new database on all substances used in food contact materials and has published an article. The assessment uses a range of authoritative, hazard information and use related data sources, all listed in the article. Members agreed that this issue should be handled by FCCG.

Action: *CITPA to ask Cepi for a meeting of the FCCG to discuss.*

6) Report from Packaging Ink Joint Industry Taskforce (PIJITF)

High level meetings being established to promote OSOA position, one meeting took place with ECHA, separate meetings are expected with DG ENV and DG Sante. PIJITF is also working on the transparency tool, which is expected to be approved soon.

7) Update on Council of Europe

Jan reported that the general resolution and the paper and board resolution have been published. No other updates.

8) Update on projects

a. Harmonised questionnaire

Ute mentioned that the Steering Group has decided the new version will be implemented in a new IT solution. Tests are ongoing.



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b. Substances of interest

Action: *Willem to send CITPA the current list.*

9) ABO concerning product safety

a. TiO₂

Willem gave an update on the TiO₂ developments. Based on study from EFSA, titanium dioxide is safe for use and can continue to be used as a food contact material.

Date and Place of next meeting: April 2022 (exact date to be confirmed)