

CEPE

ANNUAL REPORT

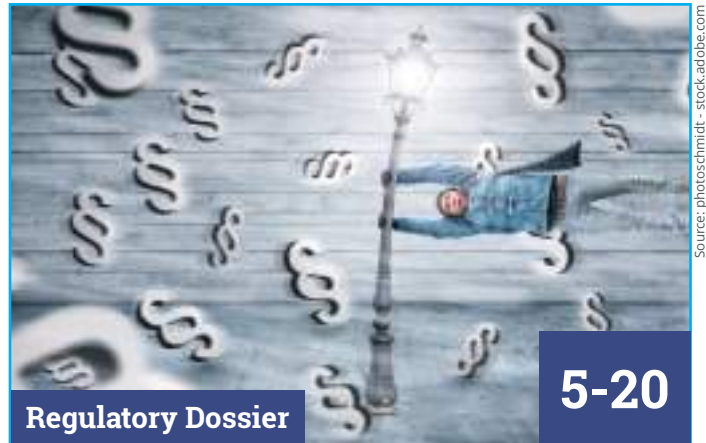
2019

The European Council of
the Paint, Printing Ink and
Artists' Colours Industry



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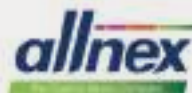


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Jan van der Meulen
Managing Director
CEPE

Dear Reader,

Being this the last time for me to write the editorial for this annual report allow me a little reflection at the end of my time with CEPE.

When I joined CEPE in 2005 we had quite a few changes to make. With the members receiving dual membership (both with the national and their European association) there was a need to bring the members closer to what CEPE was doing on their behalf. And one of the contributions to that goal became this annual report. In place since 2006.

Through the diligent work of the CEPE staff each of us wrote his or her part with a view to bring the member closer to the issue and to what CEPE was planning to do to the issue. Assuming that our readers would not be much involved with our topics on a regular base we normally went quite comprehensive.

In comparison with 2006 (REACH was still in the 'making') we had a lot less industry wide issues than we have today. Nowadays we face the many impacts REACH and CLP have on the substances we need for our formulations. A lot more scrutiny and political turmoil than in those days.

Today CEPE organizes anywhere between 80 to 100 meetings per year to adequately address the many issues. And it is through the constructive involvement of the participants (company and association delegates) in those meetings that we are able to report every year the progress they made during a year.

New offices

As staff we were very pleased to move into our new offices at the metro station Delta since the beginning of this year. After nearly 20 years in the Cefic buildings it became time for change. Meeting facilities and lunch area are very adequate and agreeable.



Farewell

When our Board has found a replacement for me I will leave CEPE by early 2020. I am sure it will be odd to no longer be in the centre of the industry. An industry which I joined as a research chemist some 40 years ago. I am happy that I can look back on the 15 years with CEPE and say that it was a joy to work with both the CEPE staff and the many people that participated in CEPE working groups. ◀

Jan van der Meulen

Reason to act

CEPE is an industry association that offers the legal platform for its members to meet and to discuss industry issues.

The typical issues that require a collective industry approach, often originate from areas such as:

Upcoming or existing legislation on safety, health and the environment (chemicals, emissions, labelling, transport etc.)

- Unsatisfactory situations in the industry concerning the position or the image of the whole sector.

Efforts that are undertaken can be reactive or pro-active to these issues.

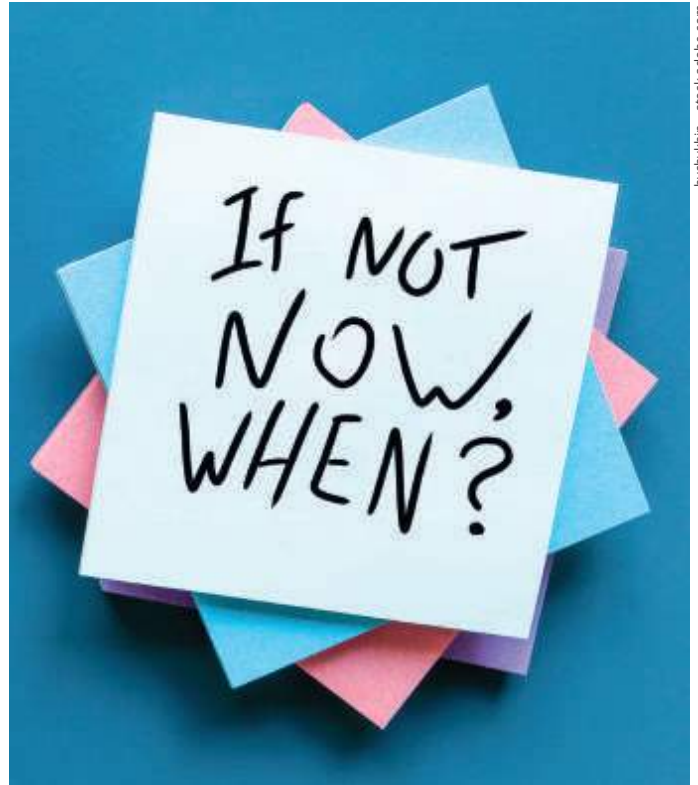
The benefits from the collective efforts are meant for those that have joined the CEPE membership.

THE INDUSTRY TO SPEAK UP

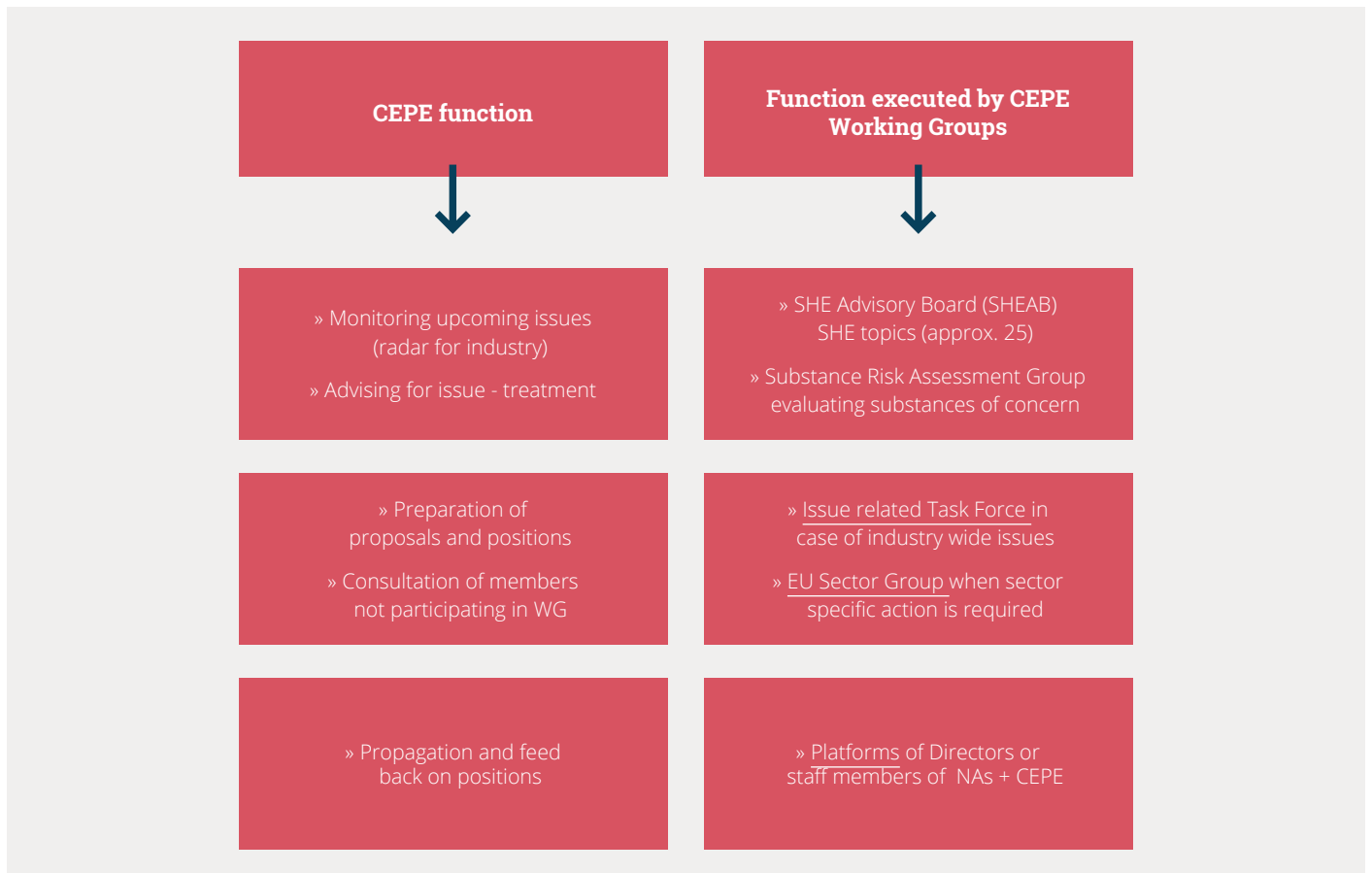
To deliver „One message“

CEPE or EuPIA represent the interests of its members at:

- the EU commission or parliament or the delegated EU institutes.
- the EU industry associations that are relevant for the supply chain.
- the UN (directly or via its membership in the International Paint and Printing Ink Council - IPPIC (WCC)).



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Nanomaterials

Should they be regulated?

Nanomaterials have a huge potential for innovations in the paint and ink industry.

Modifying the properties of surfaces with these carefully designed particles has already made a start in our industry and is expected to grow substantially.

But these small dimensions make them suspect of having adverse health aspects.

To address these fears the producers and institutions are spending efforts in the form of research and guidance for safe use.

Meanwhile regulators believe they should act as a matter of precaution to protect the users and consumers for the potential negative effects. But if you want to regulate you first need to have a definition on what a nanomaterial is.

The EC launched a 'working definition' for nanomaterials in 2011 as follows:

'Nanomaterial' means a natural, incidental or manufactured material containing particles, in an unbound state or as an aggregate or as an agglomerate and where, for 50 % or more of the particles in the number size distribution, one or more external dimensions is in the size range 1 nm-100 nm.

As long as this 'working definition' has not been officially reviewed it stands for the regulatory work the EC does on nano.

Despite pressures from some member states and NGOs to have special 'nano' regulation, the EC has since 2018 decided to register nanoforms of substances under REACH via annexes. The manufacturers or importers have to supply such additional information to their substance dossiers.

Some Member States felt that EC was not doing enough and decided to have national registries for nanomaterials. This to monitor where and how much of these materials were placed on their markets.

This is meanwhile the case for:

- France
- Belgium
- Denmark
- Sweden.

At CEPE's website a summary of the typical obligations for these registries can be found.

CEPE's Task Force

This TF meets twice per year and deals with the following three aspects.

Political situation

At the EU level this means the discussion on the definition. CEPE's concern is that nano size particles that are part of the tail of the size distribution of long time used pigments and fillers should stay out of a definition on nanomaterials. If there were to be further regulation then the focus should be on intentionally designed nanomaterials.

At national level the National Associations seek to prevent as much as possible new registries or have them at least 'reasonable and workable'.

Support for the members


In line with CEPE's principles of product stewardship a guideline on safe use of nanomaterials was issued.

For Member States that have the obligation to register the TF works together to develop guidance on how the members can comply when it comes to paint or ink formulations that are placed on the markets of these Member States.

Standards for nanomaterials

Besides the political context one has to realize that also the development of standards will have an impact on how we will deal and communicate on 'nano'.

At the global level IPPIC monitors the issue within the ISO community by being very active in the standardization developments across various groups at ISO TC 229.

On European level, FIPEC participates at CEN standardization bodies for Nanomaterials as a member of the CEN TC 352. It is rather important to participate in such groups to make sure that the correct interpretations are in place in order to avoid restrictions or additional labelling of pigments and additives used in paints. An overview of the CEN and ISO groups is given below: 

Current organisation and IPPIC involvement

ISO TC 229

1. Terminology and Nomenclature
2. Measurement and Characterization
3. Health, Safety and Environmental Aspects of Nanotechnologies
4. Material Specifications
5. Products and Applications

→ IPPIC involvement



CEN TC 352

1. Measurement, Characterization and Performance Evaluation
2. Commercial and Other Stakeholder Aspects
3. Health, Safety and Environment





Reach

The registration of phase-in substances was concluded in 2018, and as of July 2019 the European Chemicals Agency (ECHA) counts over 96 000 registrations for 22 475 different substances. ECHA's focus has now shifted to the use of the submitted data to map and manage the 'chemicals universe'.

REACH Review actions

The second review of REACH in 2017 concluded that REACH was meeting its objectives and generally effective, but there were opportunities to improve and simplify its implementation. The review yielded a series of 16 actions; CEPE, as such or as part of DUCC, the Downstream Users of Chemicals Coordination Group (the European platform of mixture formulating industries, which CEPE has chaired since 2016), is involved most closely in the following:

- **Action 1, encourage updating of registration dossiers:** the Commission drafted an Implementing Regulation on the duty to update dossiers, which is intended to be finalized before the end of 2019. This includes time periods clarifying the meaning of 'without undue delay' for various updating obligations in Article 22. DUCC intervened on this, as it was important to avoid any conflict

with DU obligations and their respective timelines (12 months to comply after receiving an extended SDS, and just 6 months to notify ECHA if a DU Chemical Safety Assessment is needed). The current draft respects both our needs and the existing legal text.

- **Action 3, improvement of the workability and quality of safety data sheets:** this project aims to identify the information needs of different supply chain actors, and how to generate and transmit that information. Proposals for solutions gathered in 2019 will be worked out, tested and evaluated in 2020 and beyond. CEPE and DUCC are key participants, including at workshops held by ECHA/the Commission in March and September 2019. This action is closely linked to the activities of the Exchange Network on Exposure Scenarios (ENES) (see below), and it is important to maximize use of

those tools and avoid yet more different solutions being invented.

- **Action 12, interface REACH and OSH legislation:** this seeks to remove overlaps and enable the use of REACH tools and information for occupational safety and health - currently not well integrated. CEPE is a member of the Cross Industry Initiative (CII), which advocates against excessive regulation of substances under REACH (e.g. through authorization) where OSH legislation can provide sufficient control.

Exchange Network on Exposure Scenarios

ENES is a collaborative network of sector organisations, Member States and ECHA that develops tools and good practices to improve the communication of REACH information in the supply chain. DUCC was a co-founder of ENES and the CSR/ES

mote, demonstrate and improve understanding of the numerous tools already available. To elaborate on just a few:

- Use map packages were developed by DU sector organisations to provide standardized information to registrants on the uses of substances (in mixtures). Besides an overall map, these packages include exposure assessment determinants for consumers (SCEDs), workers (SWEDs) and the environment (SPERCs). In 2018/2019 CEPE produced updated SPERC factsheets and generated Chesar files for its use map package, to facilitate import into ECHA's CSA tool for registrants.
- Exposure assessment methodologies: in 2018/2019 CEPE has participated in projects to review, and align/consolidate where possible, the assessment frameworks for worker and consumer exposures.
- ES for communication: DUCC has been a key player in developing solutions to make exposure scenarios easier to read and navigate, such as the Table of Contents and Structured Short Titles. DUCC is also a co-founding partner in the ESCom standard for electronic transmission of ES information, and is currently working on harmonization of the standard phrases used by its member sectors in their use map packages in order to improve the quality of the ESCom Phrase Library.
- SUMIs: Safe Use of Mixtures Information documents are a means for formulators to provide consolidated information on

exposure scenarios and conditions of safe use to the users of their mixtures. This is a 'bottom-up' methodology developed by DUCC, based on typical standard conditions for workers as defined in the SWEDs, which aims to make compliance with REACH obligations easier for a majority of formulators and/or products.

CEPE's SUMI package, developed in the Exposure Scenario Coordination Group (ESCG), was originally launched in 2017 and its roll-out to the membership has been supported by a series of training workshops with the national associations. CEPE's SUMI selection method was tested in spring 2019 as part of a pilot (ENES action 4.1) led by DUCC; although there were no 'easy answers' since the test ES were not generated from CEPE's use map, there was a lot of positive feedback on CEPE's methodology and SUMIs and some constructive comments which have been taken back into development of the package.

At the time of writing CEPE's package is undergoing an update and improvement, including high-quality pictograms commissioned by DUCC, inclusion of environmental information (for professional uses) and revisions to the guidance. Help is however still needed with translations into all EU languages. Additional differentiated SWEDs/SUMIs are also in development for certain technologies (e.g. UV products), and a guideline has been developed in conjunction with SubRAG (see separate article) to help members refine assessments and SUMIs for specific mixtures or uses where required. A mechanism will be established to collect feedback from CEPE members over the next couple of years, as they implement SUMIs and communicate them to customers, and as we gain experience the method will continue to be developed and refined. In this context ESCG will also work together with SubRAG to identify where certain specific substances need further attention for risk assessment.

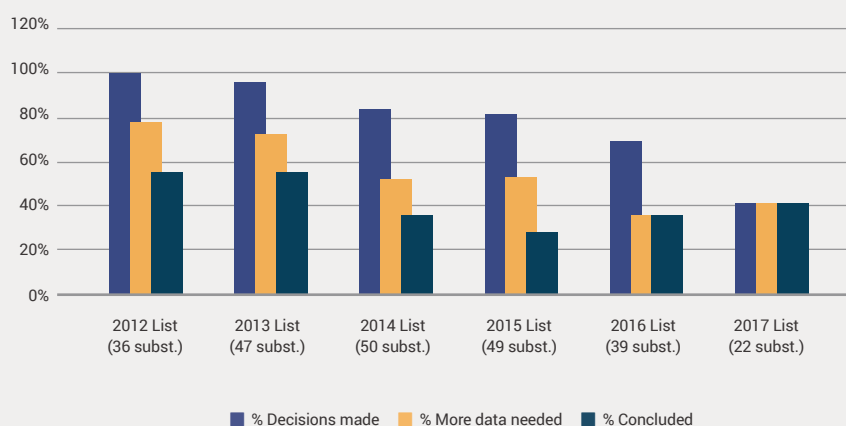
CORAP

The Community Rolling Action plan (CORAP) started with a first list of substances to evaluate in 2012. Member States propose substances to review because

Roadmap 2013-2018, the outcomes of which are now being taken further in the ENES Work Programme to 2020, comprising 23 actions in 6 focus areas – CEPE/DUCC are involved in some 80% of these. More information can be found at www.echa.europa.eu.

As chair of DUCC, CEPE is a lead organizer of the ENES 12 event scheduled for 21 November 2019 in Brussels. The goal of this event (for 150 delegates) is to pro-

Figure 1: Evaluation status July 2019



they have concerns and they open the registration dossiers submitted by Industry to ECHA. Half of the CORAP substances under review (now 375 substances in Corap) are of interest to our industry, sometimes to single sectors, sometimes to many of our sectors because of their wide use. They can be used as substances on their own or be monomers used to make polymers.

Overall since the program started in 2012, 102 conclusions have been reached and a few are about to be concluded, which means that about 1/3rd of the substances evaluations have been concluded (see figure 1).

41 out of these 102 have concluded that all the initial concerns have been satisfactory answered and there is no more regulatory action needed. This also means that in >50% of the cases further actions have been identified, as shown in the graph below (see figure 2).

In about 1/3rd of the cases there is a need for a new or revised harmonized EU classification.

Polymers Requiring Registration

When REACH was designed it first targeted individual chemical substances, inclu-

ding monomers of polymers. Today there is 22287 substances registered. The polymers are complex mixtures of molecules of different lengths. Monomers react in chains of different molecular weights depending on recipes, reactants, catalysts and production methods. These are all business confidential information as such operating conditions will dictate the properties of the desired polymers in end uses. There are a multitude of different polymers and unique identifiers are probably very difficult to develop unless a variety of molecular weight for a certain mixture of polymers can be accepted. This explains why polymers have been out of scope of REACH until now.

However this was only a question of time. All substances being now registered, COM started to look at what they called before 'polymers of concern', now 'Polymers Requiring registration' (PRR). Indeed, REACH Article 138 'Review' indicates under 2:

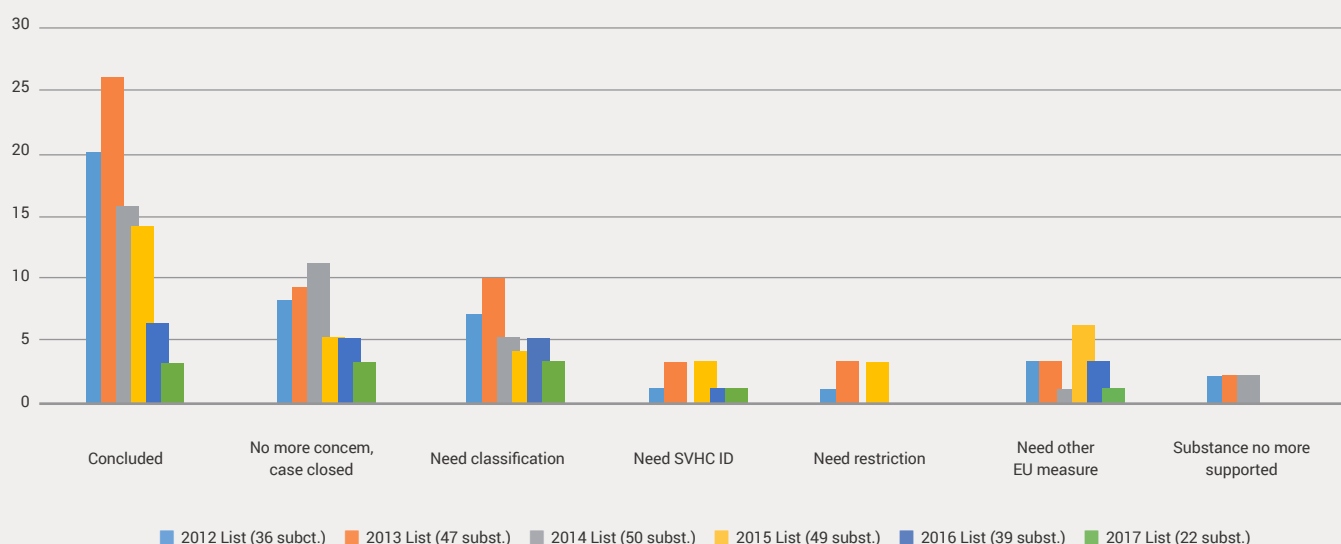
The Commission may present legislative proposals as soon as a practicable and cost-efficient way of selecting polymers for registration on the basis of sound technical and valid scientific criteria can be established, and after publishing a report on the following:

- (a) the risks posed by polymers in comparison with other substances;
- (b) the need, if any, to register certain types of polymer, taking account of competitiveness and innovation on the one hand and the protection of human health and the environment on the other.

COM has already tried to tackle polymers in the past years without success, but this year they contracted another consulting firm to carry out an analysis and impact assessment with the serious intention to change the legislation and put PRRs in scope of REACH. A dedicated 2-Day workshop was organized in Brussels where Industry indicated that many data is already available and can be made available in a joined effort if CBI can be guaranteed. This was well received as the knowledge is largely in the hands of industry. It is therefore expected that more active work will take place on this subject, mainly at CEFIC level for Industry. Our sector is involved in a mirror group together with the resin technical platform of CEFIC.

It is therefore possible that COM will identify the need to register polymers under REACH with an amendment of the legal text in the coming 2-3 years.

Figure 2: Outcome of Evaluation conclusions. Status July 2019



Substances under political scrutiny

Our industry may be using the largest range of chemical substances. The CEPE monitoring database follows-up about 1/10th of the substances in use based on the most challenged ones, i.e. those substances that are proposed to be evaluated under the Community Rolling Action plan (CORAP) or that are under other regulatory focus. We are now monitoring the EU regulatory fate of 360 substances (15 more than a year ago). Through CEPE our community gets informed of any change in classification under CLP, REACH evaluation, restriction and SVHC statuses. For a substance of high relevance and when it is identified that resources can be invested in a particular case, CEPE forms a dedicated (or even several) group(s) to address the challenge. Here is an update for some of them.

Titanium Dioxide - TiO₂

Our No 1 dossier. This essential pigment is being discussed under three regulatory schemes: CLP, REACH and Occupational Safety.

Under CLP, the French Authorities submitted 3 years ago their proposal to classify

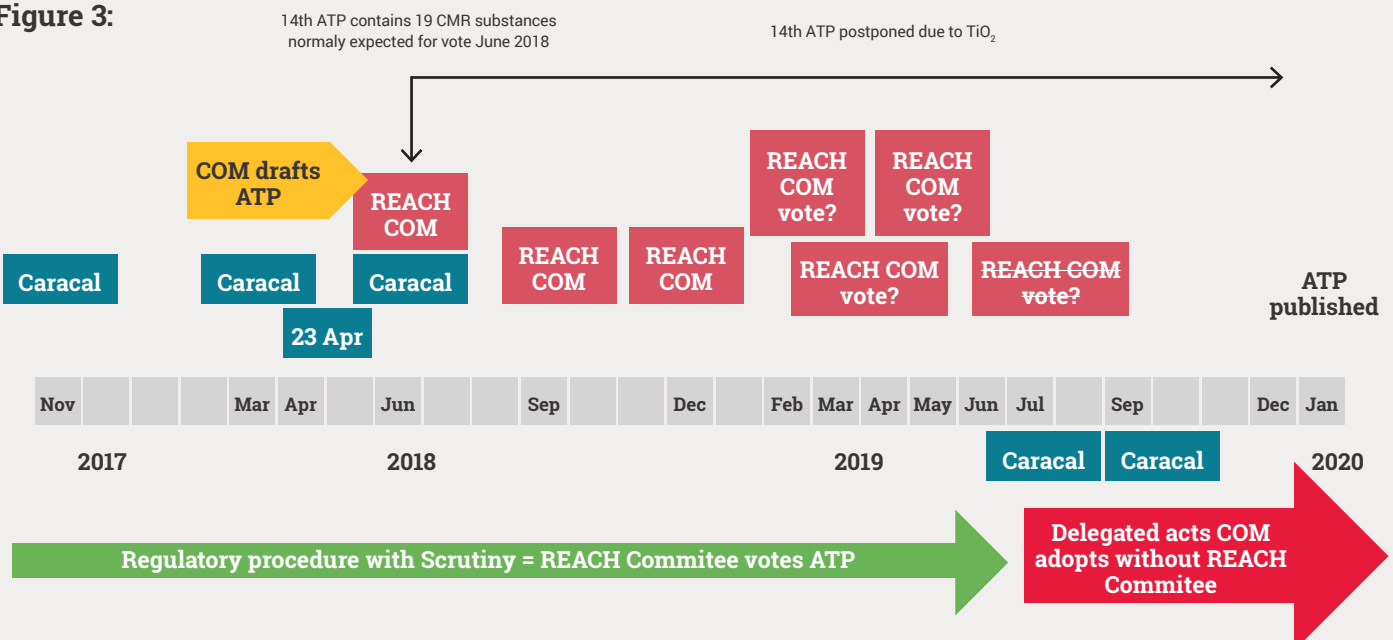
it as a Carcinogen by inhalation Category 1, and a year later the RAC Committee of ECHA concluded that it should be classified a Carcinogen by inhalation category 2 (hence downgraded but still classified). Their 50 pages report was made available in September 2017 and contained interesting wording, making it obvious that the toxicity observed in laboratory rats was not intrinsic to TiO₂ but a general effect of lung overload of solid particles. Nevertheless the EU Commission did not question the particularity of the case and took forward the RAC opinion through the procedure. This is when we became

highly involved in highlighting to COM and to MS Authorities the irrelevance of such effect to the general population and to professional users, and the fact that workers are already protected through existing national limits at the workplace. A classification would have no benefits to human Health but a lot of unintended adverse consequences for many industries, first on ours. We have therefore been calling COM to exert their power of scrutiny and MSs to take a step back and not rush in a strict hazard based procedure.

If nothing can be done with this case it will mean that this CLP procedure will never be challengeable for other substances in future, hence as soon as RAC will propose a new classification it will be adopted. And this may explain why the DG Environment of COM is so adamant to maintain their classification proposal (with DG GROW's support unfortunately). Overall, one can understand that well working procedures cannot always be challenged if we want legislation to effectively work, but we hope that some Authorities could still take the courage

« We are now monitoring 360 substances. »

Figure 3:



to challenge particular cases. What happened for TiO₂ was a mix of both, but with a prevalence of following-up a strict well established hazard based process.

We have been able to bring attention to ascertain sufficient discussions at CA-RACAL and at the REACH Committee levels as can be seen on figure 3.

The Commission allowed this dossier to be **discussed many times** – this is unprecedented – but MS representatives mostly maintained a position of principle: if RAC proposes a classification it is difficult to deviate from it, however unintended consequences should be solved by COM. Hence we never saw a majority of MS questioning the relevance of this dossier under CLP and COM proposed to **focus the classification on the powder form of TiO₂** (hence liquid mixtures containing it do not have to be classified as carcinogen by inhalation). This position was confirmed to us in writing by COM in answer to our letters. As far as we know it is still the position that will be taken forward end of 2019, now under **Delegated Acts**.

A short explanation is probably needed here. Some of the readers of this article may be familiar with the EU Institutions and may have noted that back in 2009 under the Lisbon Treaty it was agreed that for some processes **COM has to get more freedom to act** with less interference of MSs. It is only this year, 10 years later that the new procedure was voted for CLP. Hence the previous Regulatory Procedure with Scrutiny has now been changed to Delegated Acts for the adoption of ATPs to CLP. It means in practice that the REACH Committee is no more involved with this and hence no MS vote is required for COM to adopt an ATP. The only step that will remain will be an advisory discussion at CARACAL level.

TiO₂ is included in the 14th ATP, which contains the harmonized classification of 28 substances (cobalt is another one). A last discussion on the 14th and the 15th ATP will take place mid-September 2019, following which we expect

COM to adopt them, send them to the EU Council and EU Parliament for a 2 months scrutiny. **An official publication may therefore be published early 2020, giving a typical 18 months period for implementation by Industry.**

We are still busy raising key points to high level of COM and are waiting for an answer to our last letter from June 2019. Within a better Regulation environment COM ought to question these developments, in particular with regard to **subsidiarity and proportionality of the action** and the current lack of impact assess-

« ATP proposals
will now go via
delegated acts. »

ment. We are also questioning some of the proposed new rules under Delegated Acts to ensure sufficient transparency, industry participation, public consultations and impact assessments for cases of high relevance such as this one.

Under REACH, the substance evaluation done by France is progressing as a first decision was sent to the Registrants this spring to provide additional data, and these requests didn't come out of the blue. It will take a couple of years before new studies are generated and evaluated, hence nothing significant is expected from that angle in the short term.

Under occupational safety, we noticed at some points during the last months that a request was made to establish harmonized Occupational Exposure Levels for both TiO₂ and dusts. At this time, due to

the transition from the previous SCOEL body to RAC and due to other priorities, we haven't seen these on their agenda and we will naturally follow-up this development as well.

Risk Assessment activities

SubRAG stands for Substance Risk Assessment Group. It continues the previous activities of ToxAG (review of scientific literature and regulatory developments for a number of targeted substances) and has added the risk assessment for important substances for our community for which a concern may exist.

It is composed of toxicologists, risk assessors, and other members having an interest in this field and willing to contribute.

The group aims at identifying safe use of chemical substances in typical applications of our industry. In a first stage it is taking the standard exposure scenarios developed by the CEPE ESCG named SWEDs (Specific Workers Exposure determinants) and SCEDs (Specific Consumer Exposure determinants) to run risk assessments. Using a first Tier model ECETOC TRA ('TRA' meaning Tier Risk Assessment) – the mostly used under REACH – it identifies which applications are safe and which ones require refined risk assessments for industrial and professional workers. When modified conditions of uses are needed to show safe use, it runs the model through to identify these conditions. CEPE members can therefore best identify what is most relevant for their customers to pass them on safety information down the supply chain. Risk assessment will also be conducted for consumer products using the well-established exposure model ConsExpo. A discussion is needed with the Dutch Institute who developed it to update their Paint Factsheet that is >20 years old.

Such activities aim at showing that our Industry has an active product stewardship program and helps companies to comply with REACH requirements when substances are not adequately

* See www.ima-europe.eu/commitments/nepsi



supported by REACH Registrants. Sub-RAG has also developed a Guidance for using ECETOC TRA for those companies who cannot satisfactorily use SUMIs to pass on safe use of mixtures to their customers.

Di-isocyanates

These essential monomers for the polyurethane technologies are being discussed under two regulatory schemes: REACH and Occupational Safety.

Under REACH the **German proposal** to restrict the use of polyurethane products containing at least 0.1% of free monomers of di-isocyanates to trained professional users was discussed at the REACH Committee level several times during the past year. The first discussion took place in September 2018 and the proposal was not well received by a majority of MSs. It was deemed to be

too prescriptive due to a lot of remaining uncertainties on the practical implementation and enforcement, and due to the interference with the established Occupational Safety and Health legislation (OSH). As a way forward later this year **COM proposed a much reduced restriction** leaving a lot of flexibility to MSs to implement it in their country as they best see fit. The responsibility to implement the training is now on MS side and Industry is not anymore legally forced to do anything with respect to training. We think that MS should be forced to provide their national requirements by a certain deadline (we proposed 1 year), that the information on packaging that a training is required should be implemented within 2 years of Entry into force, and that workers should be trained within 4 years after Entry into force. The downside is that MS can therefore choose whatever training system and material they

see fit and hence there could be lack of harmonization in Europe. We would like that MSs use whatever industry has been able to prepare and we would like mutual recognition of the training provided to a worker in one country to another. Hence CEPE is actively working with the manufacturers association as well as with other downstream associations and keeps on developing a first set of harmonized slides for a basic training for industrial workers.

This topic is on the agenda of the coming REACH Committees with no vote expected in 2019 anymore.

On the Occupational Safety side, these chemicals are now a priority for RAC. A close follow-up on this development will be needed as some MS may want to set very low OELs. 🗳️

Microplastics

What is the latest on a potential restriction of Microplastics (MPs)?

After having held several meetings with industry under 'a call for evidence', the European Chemical Agency (ECHA) has since 30th of January published a restriction proposal according Annex XV of REACH.

ECHA also opened a public consultation on the topic since 20 March for which CEPE has submitted its opinion.

The scientific (RAC) opinion on the hazard aspects and scope should be adopted in December of 2019 and a Socio Economic Analysis report should be adopted by March 2020.

CEPE's Task Force on Microplastics has been preparing the CEPE position and responses to the public consultation and considers further lobby activities in liaison with CEFIC and the dispersion producers (EPDLA)

What does the restriction propose and what would it mean for paints and inks?

Remark: This restriction proposal does not address the so called secondary microplastics which result from 'wear and tear' of the use of products (e.g. degradation and sanding of old paint layers).

« Reporting release estimates makes no sense. »

The by ECHA proposed restriction is intended to reduce or eliminate the release of microplastics to the environment. Through its definition of the MPs ('a polymer that is not liquid or gas is solid') ECHA considers dispersions to be included.

ECHA admits that the definition may not be the best example of science but justifies the definition with the strong argument of the polymers being persistence and accumulative in the environment.

The CEPE members are in scope as soon as they use microplastics in the form of 'solid' polymers in their products. Basically such use covers two broad functions:

- **Film-forming:** after having applied the paint or ink the water evaporates and the dispersed polymer in the paint or ink formulation turns into a film that adheres to the substrate and ensures durability
- **Non-film-forming:** these are polymers that are added to a formulation to achieve characteristics like scratch resistance or a matt appearance. These non-film-forming polymers become after application an integral part of the paint or ink film and are so firmly embedded in a matrix.

The proposed restriction comes in the form of three types of measures:

#1. Restriction on the placing on the market: where the use of MPs will inevitably result in releases to the environment.

Such restriction will impact large parts of the cosmetics: detergent and crop protection products.

When products would be filmforming after their application and no longer count as microplastic they are derogated from this prohibition of placing on the market. This derogation also applies to mixtures where microplastics are permanently incorporated into a solid matrix at the point of use.

Paints, printing inks and artist colours fall under this derogation, but would be impacted by the two remaining measures:

#2. Labelling requirement: where MPs are not inevitably released to the environment but where residual releases could occur.

Residual release could occur via waterborne paints by:

- Cleaning brushes, rollers or other application equipment under the tap. If not contained otherwise the flushed out paint or ink may go down the drain.
- Discarding left-over product via drain or landfill.

To address this a manufacturer:

Shall ensure that the label and/or SDS, where applicable, 'instructions for use' (IFU) and/or 'package leaflet' provides any relevant instructions for use to avoid releases of microplastics to the environment, including at the waste life-cycle stage.

#3. Reporting requirement: as a measure to improve the evidence base on the remaining uses of microplastics.

The manufacturer: *shall send to ECHA in the format required by Article 111 of REACH, by 31 January of each calendar year:*

- a) the identity of the polymer(s) used in the previous year,*



- b) the use of the microplastic ,
- c) the quantity of microplastics used in the previous year, and
- d) the quantity of microplastics released to the environment, either estimated or measured in the previous year.

What is CEPE's reaction on this restriction proposal?

CEPE has submitted its position to the public consultation which is summarized here below.

CEPE agrees with the overall intention of this restriction that the use of microplastics should not burden our environment. However the suggested measures to prevent or reduce such burden should be effective and proportionate. And prevent any unnecessary stigmatizing of polymers in general.

In very short CEPE objects with:

- Scope of this restriction is too broad and unworkable. The term 'microplastic' is defined, but there is nothing on 'will result in release' offering a distinction in the severity of release.

- The use of mixtures containing microplastics inside an industrial installation should be derogated and therefore not be subject to labelling and reporting.
- Reporting makes no sense and has no benefits and should be omitted from the restriction.

In more detail the two impacts relevant for the CEPE members:

- The label and/or SDS obligation seems reasonable for CEPE to accept. CEPE agrees that the main residual release of microplastics comes from consumer habits when cleaning of brushes and rollers under the tap and the dirty paint water goes down the drain. Therefore, CEPE accepts the principle to alert the user to such potential release. Meanwhile CEPE has published a CEPE guide on brush and roller cleaning.
- The reporting obligation is something CEPE sees no reason for. It would not measure the effectiveness of a restriction. The only variable in such reporting would be the annual volume used being only a reflection of the industrial activity in the sec-

tor. If no change were to be made to the proposed ECHA scope (i.e. including all the industrial uses) and the suggested detail of reporting would remain this would lead to a complex administrative activity and an enormous cost burden with no benefit against it. A rough estimate leads to 6.7 Billion Euro / year.

What will be the next steps?

ECHA is legally challenged (by CEFIC) if the restriction under REACH is correctly used. REACH being there for substances and not for a group of polymers. And not having a proven hazard as base for this restriction proposal.

ECHA needs its time to digest all the responses from the running public consultation.

CEPE is stand-by to respond on whatever question from ECHA on paints: printing inks and artists colours. In preparation of scheduled REACH committee meetings CEPE will consider how to get Member States Authorities involved in this matter. 🗨️

Hazard Communication

The main EU regulations governing communication of hazard information on chemicals – including mixtures such as paints, printing inks and artists' colours – are the CLP Regulation (EC) No 1272/2008 (classification, labelling and packaging) and REACH (1907/2006), Annex II on the compilation of safety data sheets. CEPE is active in many issues related to these, often in partnership with other mixture formulators through DUCC (Downstream Users of Chemicals Coordination Group, chaired by CEPE since 2016).



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Information for poison centres

In 2017 the European Commission harmonised the information on hazardous mixtures to be submitted to Member State 'appointed bodies' in future for the purposes of emergency health response, with the publication of Annex VIII to CLP (Regulation (EU) 2017/542). The new annex was the result of consultation with Member States and stakeholders (including CEPE) since 2010, but its requirements are very complex and burdensome and contain a number of problems which need to

be fixed before it comes into effect (originally planned for 1 January 2020). A lot of work is still ongoing, and nine years on this remains one of CEPE's most important and time-consuming dossiers. A brief overview of the main developments follows.

Legal amendment

The Commission recognised that some clarifications and modifications were necessary to Annex VIII, so it has proposed a first amendment, due to be adopted as a delega-

ted regulation in September 2019. Most of the changes are relatively minor and largely welcome, on points such as submitter details and placement of the UFI (Unique Formula Identifier) on packaging, but others create additional issues, such as the rules for reporting of Mixtures in Mixtures (MiMs). CEPE/DUCC have been successful in influencing many parts of the new text, but some areas will need to be solved in future amendments. The most positive change however is that the first application deadline, for consumer

mixtures, is postponed to 1 January 2021 to allow extra time to implement necessary adaptations.

Workability issues

For many types of mixtures it is simply impossible to comply with the requirements of Annex VIII, or compliance would generate huge numbers of submissions – for example in the case of colour-mixing/tinting systems for paints, where there can potentially be millions of final mixtures. The detailed composition reporting rules prevent grouping of these mixtures in the same way as for labelling or safety data sheets (SDS). Our members face a massive administrative burden and disproportionate costs, especially considering that paints are very rarely involved in poisoning incidents (< 1 % of all calls to Poison Centres). The Commission hired a consultant to conduct a study on the workability issues, starting (later than planned) in second half 2018. CEPE was a major contributor, and the final report will be delivered in summer 2019. The problems faced by our industry have been acknowledged, and some potential solutions to fix them are identified (such as relaxing the rules for the generic identifier ‘colouring agents’, or not notifying final mixtures but instead communicating the UFI for the base paint and tinters). The Commission has set up a sub-group to discuss the proposed solutions and possible legal amendments, starting in September 2019. This group will need to work quickly to develop and implement the changes in time for even the new deadline, and CEPE will continue to fight for the solutions we need.

IT tools

The European Chemicals Agency ECHA provides a suite of tools for companies to prepare and submit their mixture dossiers, including generation of UFIs; CEPE is part of their IT User Group and participated in development of the tools. The ECHA submission portal, which receives dossiers and relays them to the relevant Member States, went live on 24 April 2019 and further releases are due in July and autumn 2019. The latter will offer system-to-system integration, enabling companies to transmit data automatically from their in-house IT systems – likely to be very

« The system has grown into a “monster” and still needs some work to be fit for purpose. »

important for CEPE members, as manual use of the Portal is not realistic for most. The tools are regularly updated and improved, but will of course need further adaptations in light of the amendments mentioned above. At the time of writing only a small number of Member States were connected and ready to receive submissions through the ECHA portal, but this will grow steadily. Members should note that submissions are only considered valid once received and accepted by the MS appointed body! In the meantime, companies can still make submissions under existing national rules and thus take advantage of (at least part of) the transition period until 1 January 2025.

The ECHA tools can be found at <https://poisoncentres.echa.europa.eu/tools>

Guidance

ECHA published the first edition of its Guidance on Annex VIII to CLP (82 pages) on 1 March 2019, in English only. In July 2019 version 2.0 is imminent: this is a fast-track amendment including guidance on the role of distributors (including re-branders/re-labelers), who have no obligation to submit under Article 45, but under Article 4(10) of CLP can be prohibited from placing non-compliant mixtures on the market (e.g. if the appointed body has not received new trade names, UFIs etc.). The guidance will be translated into all 23 EU languages after publication of v2.0. CEPE participated in the preparation of both versions.

ECHA also provides a host of other guidance material, including manuals, videos and Q&A, on its Poison Centres website. Furthermore CEPE is developing supplementary sec-

tor-specific guidance for members, including product categorisation for specific types of coatings and differentiation between professional and industrial products.

To sum up: CEPE supported harmonisation of emergency response information across Europe, seeing the benefits for both industry and Poison Centres, but the system has grown into a ‘monster’ and still needs some work to be fit for purpose. CEPE remains fully engaged in all activities on Poison Centres and will naturally continue to inform and consult members as required.

Classification, labelling & packaging

Guidance

In Q1 2019 ECHA published new versions of its Introductory Guidance on CLP (v3.0) and Guidance on labelling and packaging (v4.0). As an Accredited Stakeholder Organisation (ASO) CEPE always participates in the drafting and revision of such documents. CEPE’s Technical Committee Labelling and Safety Data Sheets (TC-LSDS) also maintains and updates its own Guideline on Labelling and Packaging under CLP for members. In March 2019 the group published an additional advice note for members on implementation of ATPs to CLP (new harmonised classifications).

Internet sales

In 2018 ECHA’s Forum on Enforcement conducted a pilot project on distance sales of chemical mixtures, which found that over 82% of web advertisements did not comply with the hazard information requirement of CLP Article 48(2). Internet sales have therefore been made the subject of the REF-8 enforcement project, in preparation phase now with inspections to be carried out in 2020. CEPE and other DUCC associations have had concerns in this area for some time: it is typically not our members who fail to comply, but their customers, i.e. distributors, who might not be aware of their obligations. DUCC is now producing a guidance leaflet to be promoted jointly with retailers’ organisations to their members, with input from relevant CEPE groups (including TC Transport, to raise awareness of unsafe shipping in the post).



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Labelling issues

The simplification of labels is a topic now in the spotlight: overloaded labels and poor understanding by consumers were identified as a key point in the Commission's report on the Fitness Check on chemicals legislation excluding REACH (finally published June 2019), with a recommendation to make use of digital technologies such as QR codes to improve matters. CEPE is already involved in work on this area in GHS (see below) and will pursue any opportunities to contribute to activities on EU level. Digitalisation may help provide a solution for labelling of writing instruments: see article on Artists' Colours.

At a meeting of HelpNet (the network of national authority helpdesks) in April 2019, CEPE had the opportunity to present the problems faced by members from the overlap and conflict between CLP and biocides labelling requirements, and to promote its own guidelines on labelling of treated articles. Member State representatives appreciated the presentation and were invited to provide feedback on CEPE's recommendations.

Safety data sheets

Through DUCC, CEPE has given input to a new revision of Annex II to REACH, intended to be adopted before the end of 2019. The Commission seeks to increase the information requirements on nanomaterials in particular, reflecting updates to the other annexes

of REACH; DUCC had to intervene to avoid unworkable obligations for mixture SDS.

Both CEPE and DUCC joined a Forum-ASO joint working group on improving the quality of SDS, which runs until the end of 2019. Findings from 197 inspected SDS are being used as a basis to develop recommendations for SDS compilers, IT providers and also national enforcement authorities. This project also links with REACH Review Action 3 (see REACH article).

CEPE also continues to maintain and update its Guideline on Safety Data Sheets and the associated Phrase Catalogue (the latter now being administered by an affiliated member, i.e. software provider). New standard CEPE phrases are developed as required, e.g. to accommodate SUMIs (see REACH article) and perhaps in future for other topics such as microplastics.

Future CLP: ATPs and the UN GHS

CLP implements the United Nations Globally Harmonised System of Classification and Labelling of Chemicals (GHS) in the EU. CLP was aligned with both the 6th and 7th revised editions of GHS by the so-called 12th ATP (Adaptation to Technical Progress), published as Regulation (EU) 2019/521 in March. This amendment, which will apply from 17 October 2020, includes a new hazard class for desensitized explosives (relevant

for industrial nitrocellulose used in certain coatings and printing inks) among other, less major adaptations. Meanwhile the 8th revised edition of GHS has been published in summer 2019, so the whole process will soon begin again; CEPE always participates in the alignment discussions as a member of DUCC.

Harmonised substance classifications in Annex VI to CLP are updated by separate ATPs initiated on an annual basis, implementing RAC opinions concluded in the previous year. The 13th ATP (2016 RAC opinions) was published in October 2018 as Regulation (EU) 2018/1480, and the 14th and 15th ATPs are now in the pipeline: see article on substances for more details.

Shaping GHS

To pre-empt and influence future changes to CLP, and to maximise harmonisation for our international members, it is important to be involved in GHS at the UN. CEPE heads the IPPIC delegation in the UN Sub-Committee of Experts on the GHS, which meets twice a year in Geneva.

In December 2018 IPPIC's paper on the utility of digital solutions for very small consumer packages of artists' colours (UN/SCGH/36/INF.30) helped to secure the inclusion of digitalisation in the work programme of a 'Practical Labelling Issues' working group for the 2019-2020 biennium. Our proposal to de-classify flammable liquids for supply on the basis of a sustained combustibility test was unfortunately rejected, despite this already being implemented in CLP in the EU.

Other topics that we will continue to propose, support or monitor in 2019-2020 include, among others:

- Aspiration hazard: viscosity criteria at ambient temperature for materials like paints or inks
- Use of concentration ranges in section 3 of the SDS (where additivity is involved)
- Review of the 3% cut-off limit for Eye Damage Cat. 1.

Biocides

Our No 2 dossier. The fate of biocide preservatives is linked to two regulatory processes: BPR and CLP.

The review of existing biocide substances automatically triggers the request for RAC to assess a harmonized classification under CLP. CLP sets hazard based criteria and BPR triggers regulatory actions where relevant, such as the exclusion criteria.

Status of the review program

For several years and several times per year, the EU Commission (COM) provides a publicly available overview on the state of progress of the review program of existing active substances. The global outlook continues to show little progress with only 1/3rd achieved in 15 years (see figure 1, status July 2019).

A third has been achieved in 15 years and therefore 2/3rd remains in <6 years (ends 2024). And in the meantime the situation gets even more complicated and overloaded:

- Addition of endocrine disruption criteria
- Need to review co-formulants of biocidal products as well (which are regulated under REACH already)
- Renewal of substances already approved 10 (or 5) years ago
- Renewal of biocidal products as well
- Substitution criteria and comparative assessment
- Etc.

Nevertheless, the Biocide Competent Authorities still spend significant amount of time discussing subjects like:

- Museums need nitrogen to protect artworks from degradation due to the presence of oxygen. Under the BPR nitrogen becomes a biocide active substance. The International Council of Museum presented at a recent Biocide Competent Authority meeting and called for an urgent repeal of the possible ban of nitrogen for the cultural heritage preservation in the EU.
- In-situ generation of active: a mechanical device generates an ion or a free radical (for instance ozonation to clean drinking water), this also falls within the scope of the BPR.
- Under the BPR Product Type 19 'repellent and attractant' some food items became

biocide active substances as well, so in 2019 we had the pleasure to follow-up the development of the 'Cheese Act', the 'Concentrated Apple Juice Act', the 'Honey Act', the 'Powdered egg Act', the 'Vinegar Act' or the 'Saccharomyces cervisiae Act'.

As the CEPE Biocide User TF reviewed these it helped relieve a bit of tension. QUIZZ: between the Danish Blue and the Camembert, which is the best repellent? Honey Act! With your egg, eat your cheese with fructose apple juice not yet fermented to vinegar.

There is a saying 'Focus on what matters most', but this hasn't yet gone through in this area. Our view is that the review program should be finalized a.s.a.p. with the postponement of remaining uncertainties. Not all foolish ideas can be tackled at the same time.

News on substances

During the past year we have seen several key substances classified by RAC in concerning ways: the isothiazolinones OIT, MBIT and DCOIT got the same low limit as CMIT/MIT of 15 ppm for skin sensitization. At this level they are not effective. The difference in potency has not been considered which indicates an over-conservative approach to classifying these substances. This not only impacts the way our products will be classified in the future but also has potential big consequences on how the

BPR will authorize them. Also, zinc pyrithion (an essential in-can, dry-film and anti-fouling substance) was classified as Reprotoxic Cat 1b by RAC, which triggers the exclusion criteria of the BPR.

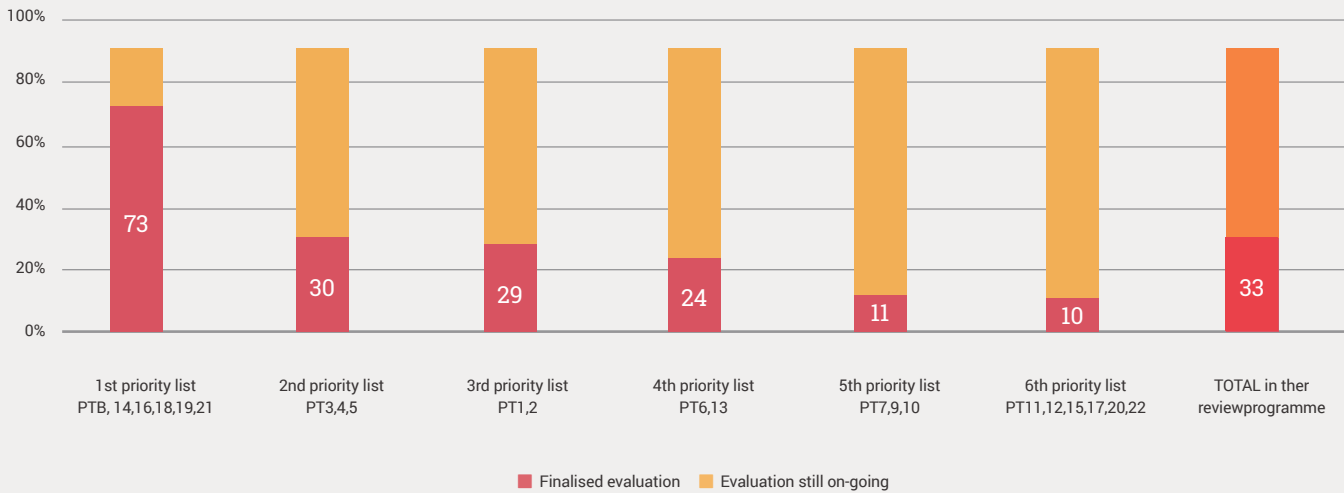
Shortage of BIT

The explosion in a chemical plant in China in March 2019 caused the shortage of an essential intermediate to the synthesis of BIT, which lead to a shortage of BIT on the world market. This was just coming at a wrong timing when EU paint manufacturers were trying to move away from MIT to more BIT. Indeed, paint containing MIT >15 ppm will be classified at the latest by May 2020 with the pictogram, signal word 'Warning' and the Hazard statement H317 'May cause an allergic skin reaction'.

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Figure 1: Overall progress on the review programme of existing AS per Priority list



„The toolbox with effective biocides for paints gets smaller and smaller.“

Advocacy activities

Significant efforts were spent end 2018-early 2019 to organize a Biocide Workshop on May 15, 2019 in Brussels. CEPE co-organized it with the detergent industry (AISE). The workshop focused on biocidal preservation. The day was a real success according to all involved. About

100 participants joined in an interactive day where representatives of 17 MSs, the Commission and the industry could exchange views in a balanced atmosphere.

On behalf of CEPE, Jan van der Meulen started the day off with:


The tool-box with effective biocides gets smaller and smaller for paints.

And pointing to the fact that:

Reducing efficacy at in-can preservation equals an increase in off-quality paint volumes that will go to waste.

This event was organized this year as a follow-up of a Commission document from 2018 which identified the potential problem highlighted by Industry during previous years and the need to innovate. The Commission was supportive with the idea and gave us a full day in the middle of a week between two

key COM and MS meetings. This allowed maximization of the possibility to get MS representatives. As downstream users of biocides preservatives we designed the workshop to be balanced and neutral, in order to create the positive atmosphere desired. Therefore, ECHA moderated the morning session where speakers of different horizons presented on the biocide regulatory framework, the need for preservation and the issues at stake, the innovation for biocide suppliers and from a downstream perspective as well as the existence of CLP and the problem of skin sensitization for consumer products. The afternoon started with break-out groups moderated by MS representatives from BE, NL, DE, DK and SE. During the second part of the afternoon, a reporting of the 5 break out groups was followed by a debate when all participants were back in the plenary room. The day closed with a friendly drink to thank all participants. It was unanimously agreed that there is a problem that needs to be solved. Competent Authorities have now accepted that our industry highly depends on preservatives (both in-can and dry-film), that there is no foreseeable substitution in the short and middle term, and that **a solution must be found given the way the BPR review program is handled.**

This workshop was a unique opportunity to create a momentum that we will follow-up in a concrete manner during the coming months at the Biocide CA meeting level. 



Transport

Roughly half of all paints, printing inks and artists' colours are classified as dangerous goods for transport, due mainly to their flammability, corrosivity and/or environmental hazards. In order to ensure safety in transport whilst avoiding undue costs, delays or administrative burden for member companies, CEPE's Technical Committee Transport (TCT) – together with international colleagues in IPPIC, especially the American Coatings Association – maintains constant efforts to influence the relevant rules: primarily the global framework of the UN Model Regulations on the Transport of Dangerous Goods (MRTDG), in order to maximise consistency and harmonisation, but also where necessary the regulations for the different transport modes (IMDG Code for sea, ICAO Technical Instructions for air and, in Europe, ADR, RID and ADN for road, rail and inland waterways respectively).

In December 2018 we achieved a significant step forward for goods transported under entries **UN 3077** or **UN 3082** ('environmentally hazardous substance, solid/liquid, not otherwise specified'). Following a working group convened by IPPIC, at its 54th session the UN Sub-Committee of Experts agreed to modify special provision 274 to allow recognised '**commodity**' names from the **Dangerous Goods List, such as PAINT or PRINTING INK, to be used as technical names** supplementing the proper shipping name (instead of one or more ingredient names, which make it harder to understand the nature of the dangerous goods and often overflow the available space). This change appears in the 21st revised edition of MRTDG, published in sum-

mer 2019, and is now being transposed into all modal and regional regulations. This is a big success for us, after ten years' work in total and a series of proposals starting in 2013. The next few years will now show whether this solves the practical problems and delayed shipments as expected with no negative impact on safety.



« We achieved that „commodity names“ may now be used as technical names. »

IPPIC's 2018 proposal to clarify documentation requirements for sea transport was taken on board at the International Maritime Organisation. Paragraph 5.4.1.4.3.6 of the IMDG Code will now make explicitly clear that **flashpoint information** is only required for flammable liquids, to avoid confusion, queries and delays arising when the requirement is read in isolation from other parts of the Code. The Editorial & Technical Group developed improved wording in April 2019 for endorsement by the Sub-Committee on Carriage of

Cargoes and Containers in September, after which it will be incorporated into Amendment 40-20 of the IMDG Code (which will apply on a voluntary basis from 1 January 2021 and become mandatory on 1 January 2022).

In December 2018 CEPE co-signed an industry letter to the EU Committee on the Transport of Dangerous Goods, advocating deletion of the word "European" from the title of ADR ("European Agreement Concerning the International Carriage of Dangerous Goods by Road") in order to encourage acceptance and implementation of these regulations by non-European countries. This support was clearly successful in influencing the Member States, and in May 2019 the Conference of the Contracting Parties to **ADR** unanimously adopted a protocol to amend the title accordingly. The change will enter into force on 1 January 2021 if no Contracting Party objects. We believe this will have a positive effect on road transport safety in developing countries in particular, whilst benefitting our members through wider

geographical alignment with the rules they already follow.

TCT's programme includes regular dialogue with national transport authorities, and in April 2019 the group hosted a representative of RIVM in the Netherlands, in addition to interactions of TCT members with their respective ministries/agencies. These meetings are of great value in building trust and mutual understanding, and help to pave the way for successes like those mentioned above. ◀

Drinking Water Contact

A new CEPE group on materials in contact with drinking water



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As time passes our EU Society continues to regulate areas not yet properly harmonized, and this is the case for materials in contact with drinking water. A recast of the Drinking Water Directive is ongoing for a while and will enter end of 2019 – early 2020 into a trilogue negotiation between the EU COM, Council and Parliament.

This potentially affects protective and powder coatings that are applied inside water pipes (epoxy technology mainly) or on devices such as pumps or valves.

Currently only some Member States have national schemes that require prior testing and approval before placing on the market. It is worth noting that since 2010 four MSs (DE, FR, NL, UK) tried to harmonize their national requirements, and a fifth MS (DK) joined more recently. This is still named 'the 4MS initiative'. Currently our members have to test their coatings under different national schemes,

different methodologies and criteria. This is costly and sometimes prevents freedom of movements of goods within the EU market. Hence our industry is supporting the principle of a harmonization. This is also supported by many associations that have grouped together on this case into an EU Drinking Water Alliance, which the newly created CEPE drinking water TF joined end of 2018 (see for more information www.europeandrinkingwater.eu/).

However, as always, when a piece of legislation is being negotiated it is necessary to have a close follow-up and, where necessary, conduct advocacy activities. The Alliance has been very active with this over the past years and the current draft looks promising. What the CEPE group has been investigating is whether the current national limits for BPA are sustainable in the long run as BPA has been specifically targeted in the draft new text as an endocrine disrupter. Initially a limit was proposed in the main body of the text at 0.1

µg/L (0.1 ppb). This is an extremely low limit which is not yet in place at national level (2.5 µg/L in DE). Although it is possible with the current analytical techniques to go down to that level of detection, it is still unclear how this could affect epoxy coatings. It seems that the specific undesired substances will rather be placed on a watch list annexed to the main text, but this will be followed-up carefully.

All in all the epoxy technology has proved to bring lots of benefits and durability of piping systems. The amount of water that goes through steel pipes in their lifetime is enormous compared to the tiny amount of BPA that can potentially be released, and that mainly occurs as residual BPA in fresh coatings, hence soon after curing. The levels that can be observed do not pose any threat for human Health or the Environment, as this technology has been assessed and accepted for decades by several national Authorities. It is hoped that science will continue to prevail. ◀

EuPIA Annual Report 2019

EuPIA, the European Printing Ink Association, working under the umbrella of CEPE, represents and protects the common interest of the European printing ink business and promotes the image of the industry to the public. EuPIA provides a forum for discussion and decision-making regarding issues of specific interest to the printing ink industry. EuPIA members also participate in CEPE working groups dealing with issues of general interest to the wider CEPE membership.

Market Statistics 2018

EuPIA publishes market statistics on an annual basis. The data can be accessed via the EuPIA website at eupia.org, About Us - Statistics.

The following statistics show a summary of printing ink sales from EuPIA's more detailed Quarterly Market Sales Statistics. The findings are based on the consolidated results of data supplied by 28 EuPIA member companies, who have all submitted data on a standard basis to our independent trustee who compiles the data for EuPIA. The results show sales volume in tonnes and value in €m for the latest year, 2018.

It is estimated that the sample group accounts for about 90% of total industry sales in Europe.

Key sectors shown

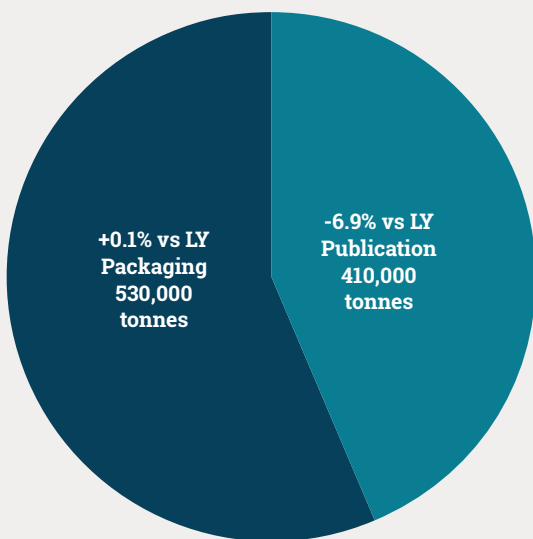
Publication Inks comprise web offset inks (coldset and heatset), sheetfed offset inks, publication gravure inks and related overprint varnishes. Examples of publications are newspapers, magazines, books, and commercial prints such as brochures and flyers.

Packaging Inks comprise flexographic inks, specialty gravure inks, energy curing inks and related varnishes. Examples of packaging are flexible film packaging, rigid plastics, folding cartons and corrugated boxes (see figures below).



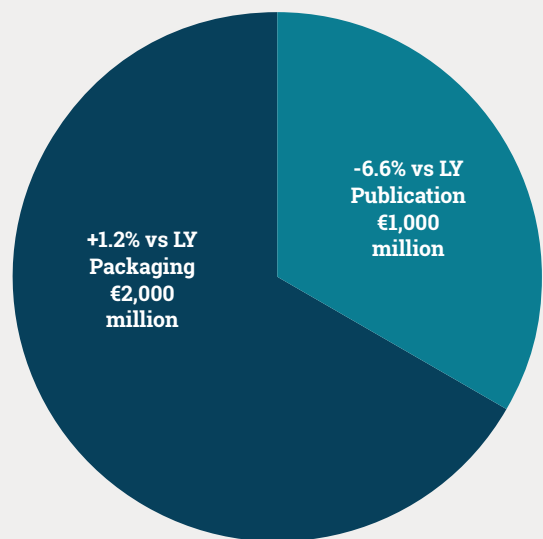
Martin Kanert
Executive Manager
EuPIA

Sales volume for 2018 in 1000 tonnes



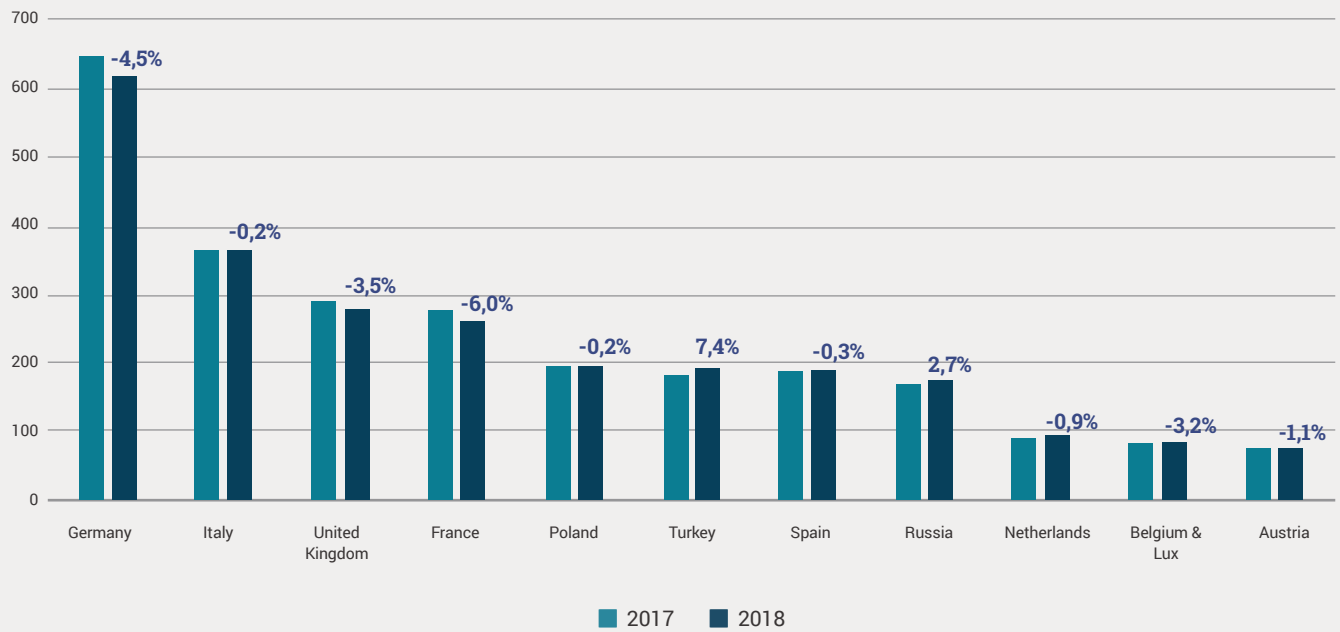
■ Packaging
■ Publication

Sales value for 2018 in EUR millions

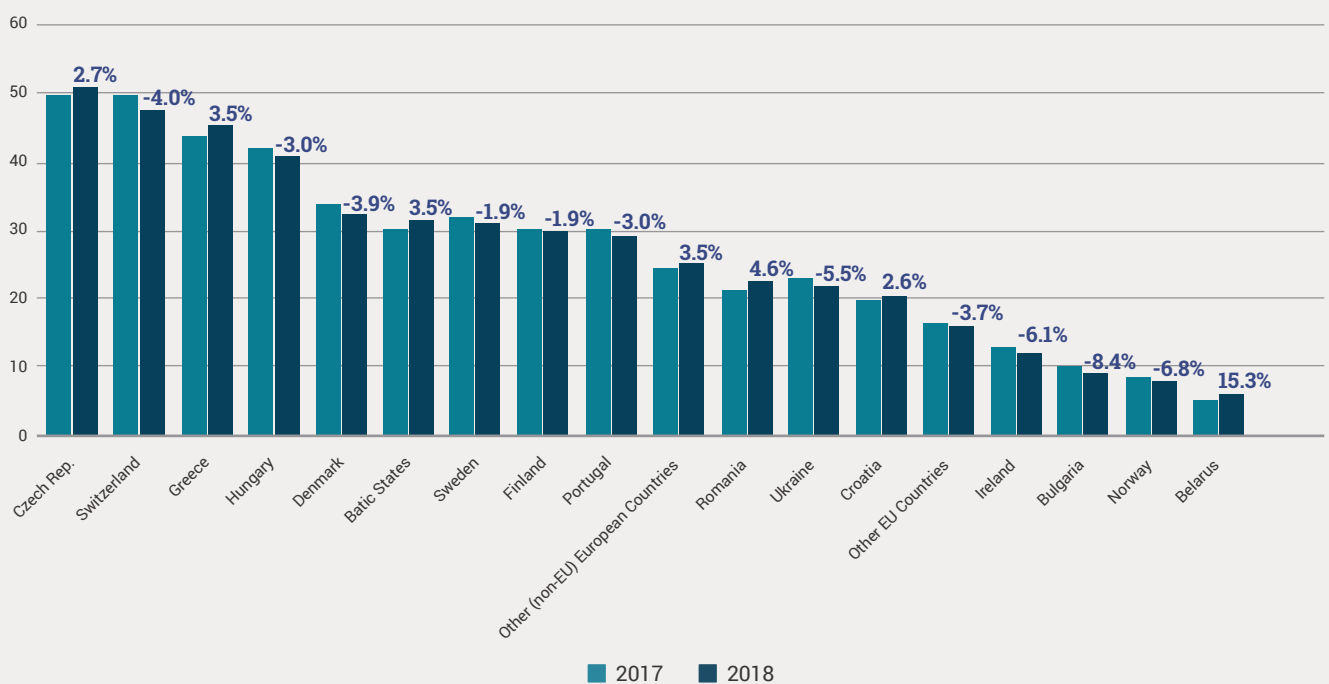


■ Packaging
■ Publication

Sales Value by country 2017 to 2018 in EUR millions



Sales Value by country 2017 to 2018 in EUR millions



Negative growth, but appetite for sustainability

EuPIA's 16th Annual Conference took place on 11-12 April 2019 in London. Negative growth in the largest markets, slower development in the East and growth only outside of the EU highlight the challenging times facing the European ink industry. Regarding sustainability, the ink supply chain thinks 2018 could have seen a better performance. These issues plus industry trends and innovation have been key discussion points during EuPIA's Annual Conference 2019.

By Sebastian Kraußlach, Public Affairs Manager, CEPE



The latest regulatory measures such as the Single-Use Plastics Directive target the reduction of waste, especially plastic waste, as primary objective. Equally, the ink consuming packaging industry recognises sustainability as the best way forward. The innovative solutions offered by the supply chain are two-fold: improved product design and more recycling. What does this mean for the ink industry?

LEADING CHANGE THROUGH STRONG PRODUCT DESIGN

Product design has been identified as a primary path to reach higher recycling rates, since not all items are equally recyclable. The UK's sixth largest food retailer Co-op therefore suggests to narrow the range of polymers used (matching them with what the current waste management systems can cope with), to simplify the packaging construction by reducing the number of layers and the removal of metal components. In addition, a reduction in the use of colour is helpful – as the sorting process becomes easier with transparent packaging.

Austrian plastics producer Borealis has established a dedicated code of conduct to have their rigid packaging designed ready for recycling. By making the appropriate material choices and design decisions, each product is produced to allow them to be collected, sorted and recycled. This entails more combinations of virgin polymers with re-cycled plastics and an increased use of mono-materials.

Nestlé Research established golden rules for the packaging of the future. With regards to plastic and coated paper there should be no use of oxo-degradable plastics, less use of carbon-based materials, and a phase-out of certain plastics (PVDC, PVC, PS). Instead, the use of transparent or lightly tinted materials should be encouraged and those residual products favoured that can easily be removed.

THE QUALITY OF RECYCLED PLASTICS

The improvement of the quality of recycled plastics is of particular interest to the ink industry, as inks have an impact on the overall characteristics of recycled plastics. Hence, the supply chain hints at the need for innovation to further enhance the de-inking properties, a focus on polymers used in inks and new technologies such as solvent-based or chemical recycling.

Design thinking and improved waste management are expected to meaningfully tackle today's environmental challenges. In order to make it a success, a collaborative approach with consumers and the supply chain is needed, especially to achieve the proper economies of scale. An excellent example is the charity and not-for-profit organisation Recoup. By providing research, technical guidance and training, Recoup promotes and increases the levels of plastic recycling among plastic manufacturers, retailers and waste management companies in the UK.

WHAT'S NEXT?

The way forward seems clear: companies take steps towards full recyclability. UK retailer Co-op already introduced a compostable carrier bag and pledges to have all its packaging recyclable by 2023. Two years later, Nestlé seeks to have achieved a rate of 100% recyclable or reusable packaging and Borealis aims at having quadrupled its recycling volume by then. These are just some of the actions already in development.

Ink manufacturers are prepared to rise to the challenges ahead. This includes giving due consideration to the interaction between the print and the substrate during the recycling process. Ink manufacturers have an important role to play and should therefore develop and promote sustainability strategies that align with their brand owners, converters and the broader supply chain. *(was published in ECJ 06 2019)*

Launch of a new website

EuPIA has relaunched its website to add more value for its visitors. Providing a clearer overview of the association and its activities, the new website now has a fresh and modern look and offers a more intuitive navigation structure. The user-friendly interface also includes improved search functionality, simplifying access to the information most relevant to the search criteria of individual website visitors. The design of the new website supports EuPIA's mission to further increase the awareness of the printing ink industry with all stakeholders and positively shape the image of an innovative, responsible and attractive industry. It is intended to strengthen the association's position as the lead voice of the printing ink industry and add additional value to its members. What's more, not only will it act as an "always on" channel to provide members and visitors with relevant information about printing inks and related products, but it will help to raise the profile of the fascinating world of printing inks.

The structure of the website is now divided into four main topic categories. The new "About us" section combines all information about the association - from its mission and vision to material about membership, including a list of members and the contact details of national associations. In the same section can be found EuPIA's reputable statistics reflecting the latest domestic ink data from the European Union. In the "Our commitment" section, visitors will find information and documents about EuPIA's Exclusion Policy for Printing Inks and Related Products. Under "Key topics" are summaries of the most important topics, including

food contact materials, sustainability, chemical regulations, safe handling and usage. Within the same section, visitors can find comprehensive information and documentation about raw material selection, migration testing, risk assessment or regulations like REACH, CLP or BPR. Lastly, press releases, annual reports and event announcements are gathered in the "News & Events" section.

The new website is accessible online at www.eupia.org.



Printing Inks and Varnishes for Food Contact Materials

It is occasionally claimed that printing inks used to print food contact materials, and in particular food packaging, are not regulated by law and therefore printed food packaging is regarded as "unsafe". That is not true!

Like all other food contact materials, printed food contact materials as well as the printing inks used to produce them are subject to the requirements of the European Framework Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. Article 3 of this Regulation lays down general requirements for the protection of consumers. For a few materials, the requirements are specified in specific legal provisions, either at EU level, such as for plastics, or at national level, e.g. for paper and board. For printing inks, such specific provisions do not exist in the European Union.

There are repeated calls for all food contact materials to be subject to European harmonised regulations that would be immediately applicable as such across the European Union in order, on the one hand, to create a uniformly high standard of consumer protection throughout the European Union and, at the same time, to prevent a patchwork of different national regulations that would hinder the free movement of goods in the internal market.

About three years ago, the European Parliament called on the Commission to adopt specific Union legislation for all food contact materials. A study by the Joint Research Centre, in which all existing regulations in the EU were researched and summarised, also suggests that there is an urgent need for harmonisation of the rules.

At the end of 2016, the Commission had announced, also in reaction to the notification by Germany of a national regulatory initiative, that it intended to issue harmonised regulations for printed food contact materials, but had currently postponed work on these regulations in order to first subject the framework regulation itself to revision.

Does this mean that there are no more specific rules for printing inks than the general safety requirements? No, because EuPIA has filled the gap and over the past 10 years has created a set of rules with which its member companies and their customers can work and manufacture printed food packaging in accordance with the requirements of the framework regulation.

Controlled manufacture according to GMP standards

The EuPIA Good Manufacturing Practice for Printing Inks to be applied on food contact materials (FCM inks) should be mentioned first. The GMP includes requirements on product composition, quality and hygiene management. It is designed such that internal and external parties can assess the EuPIA member company organisation's ability to meet customer and regulatory requirements applicable to FCM inks, and the organisation's own requirements.

The raw materials for the manufacture of FCM inks must be specifically selected. First and foremost, they must comply with the requirements of the EuPIA Exclusion Policy for Printing Inks and Related Products, applicable to any type of printing ink. They should then preferably be officially evaluated by a recognised body for their use in food contact materials. If such evaluation is not available, then the printing ink manufacturer can risk assess the raw material himself according to strict criteria. For this purpose, EuPIA provides its own guideline (EuPIA Guidance for Risk Assessment of Non Intentionally Added Substances (NIAS) and Non Listed Substan-

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in Budapest (Hungary).

ces (NLS) in printing inks for food contact materials), and trains its members in the proper application of the tools provided in the guideline.

For UV inks, EuPIA provides a Suitability List of Photoinitiators and Photosynergists for Food Contact Materials, which identifies photoinitiators and photosynergists considered suitable for use in UV printing inks and varnishes for the non-contact surface of food contact materials. This list has recently been completely revised. In addition, EuPIA members agreed on a procedure for the inclusion of new photoinitiators or photosynergists on to the Suitability List.

In order to determine that FCM inks are fit for purpose, ink manufacturers carry out indicative migration tests on model substrates. For the time being, official test methods are available for plastic substrates only. For other materials, the EuPIA Analytical Experts Working Group (AEWG) developed the EuPIA Guidance on Migration Test Methods for the Evaluation of Substances in Printing Inks and Varnishes for Food Contact Materials, which is being expanded for consideration of inks and varnishes intended to come into direct contact with food (DFC inks). Often, for migration testing, the conditions set out in the Plastics Regulation (EU) No 10/2011 are applied directly to all kinds of printed food contact materials. However, these conditions are often not suitable, as they may physically or chemically change the printed substrate. The AEWG is currently working on a study, which aims to demonstrate that some of the

proposed conditions are significantly overestimating the migration into real foodstuff at the end of shelf life and to provide better suited testing conditions specifically for printed food contact materials.

Exchange of information along the food packaging chain is vital to ensure compliant food packaging

Due to the complexity of the process, all members of the packaging chain must exchange relevant information – under appropriate confidentiality agreements if necessary – in order to ensure that products can be formulated to be fit for purpose, and thus be compliant with legal requirements (see figure below).

To this end EuPIA members are prepared to provide their customers with relevant information compiled in a so-called “Statement of Composition” (SoC). Essentially, the SoC will list those substances with a potential to migrate along with applicable migration limits and the amount of that substance in the print. The converter needs this information to assess whether the printed product complies with the legal requirements.

A EuPIA Customer Guidance Note for Using Ink Statements of Composition when Considering Compliance of Printed Food Contact Materials is intended to help packaging converters and end users assess the compliance of printed packaging using the information provided by the ink supplier.

Moreover, information relating to usage and application constraints is provided in Technical Data Sheets or other recommendation

leaflets. To assist its members, EuPIA makes available a *Technical Data Sheet Checklist*.

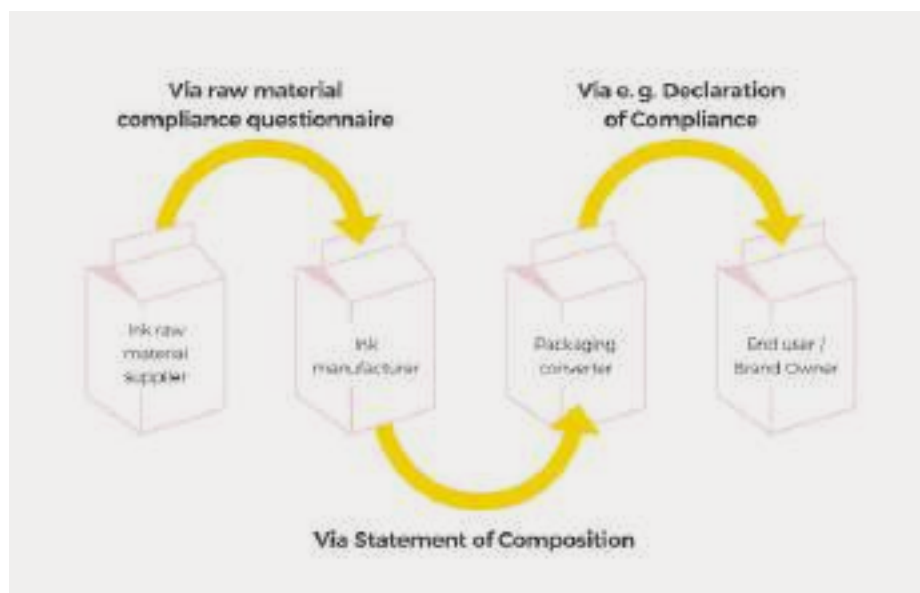
In order to enable the ink manufacturers to provide adequate information to the packaging converters, relevant information from the raw material suppliers is needed. Raw material suppliers are therefore requested to provide such information by filling in so-called Raw Material Compliance Questionnaires. EuPIA issued an Explanatory Note for Suppliers of Ink Raw Materials Regarding Regulatory Compliance of Printed Food Packaging to assist suppliers of ink raw materials in understanding the need for, and the mechanism for regulatory disclosure to facilitate the communication of relevant information down the supply chain.

With the concepts presented, the printing ink industry is already making its contribution to the manufacture of compliant, safe printed food contact materials. Nevertheless, the printing ink industry is in favour of practicable legislation for printed food contact materials, but only at European level. Together with all partners in the European value chain, as organized in the Packaging Ink Joint Industry Task Force (PIJITF), a regulatory concept has been drawn up which incorporates the elements described above and which has met with a fundamentally positive response from the responsible bodies of the European Commission.

Printing Inks and Circular Economy

The Circular Economy package is one of the most ambitious programmes of the EU Commission. It aims to stimulate the transition from a linear to a circular economy. This transformation will also affect the printing ink industry.

For this reason, EuPIA established two Task Forces, one for paper recycling, and recently one for plastics recycling. The EuPIA Paper Recycling Task Force is monitoring and assessing the legislative developments in the framework of the circular economy package and its impact on the printing ink sector. 2018 has seen many important developments such the communication on the interface between chemicals, products and waste legislation. Furthermore, the task force is providing the liaison to the European Paper Recycling Council (EPRC), is monitoring the activities on mineral oil-free inks and coordinating national activities. Currently, in France and Germany pro-





jects on mineral oil-free coldset inks are being conducted. In 2018, the Task Force also provided an update for all EuPIA position papers on recycled paper and board. Furthermore, it was and still is actively involved in the revision process of the EU Ecolabel on printed matter, which is currently ongoing.

The Plastics Recycling Task Force is focused on the current issues surrounding the recycling of plastics, how these might impact the European printing ink sector and EuPIA members' businesses, and how the ink industry may contribute to possible solutions to the 'plastics challenge'.

The Task Force has recently reached out to key stakeholder organisations and their forums working on this topic, to liaise and strengthen the network of contacts. The intention is to improve the communication and sharing of information on legislation, brand owner and retailer initiatives, and specific sectorial positions. EuPIA members are keen to support and propose solutions to some of the challenges that the plastics industry is facing, especially relating to the recycling of post-consumer waste (i.e. printed plastic packaging from the food and non-food sectors) and the recycling of post-industrial waste (e.g. emptied ink containers).

Technical and operational issues

Issues other than the above are managed in the EuPIA Technical Committee (ETC) and its subsidiary working groups Labelling and Safety Data Sheet (LSDS) and Operational Safety and Risk Assessment (OSRA).

Hazardous substances and product stewardship

The EuPIA Exclusion Policy for Printing Inks and Related Products has been a key focus this year, largely due to an increase in re-classification of substances used in energy-curing inks following REACH registration exacerbated by a global shortage of alternatives. In summer 2018 EuPIA published a *Customer Information Note: Raw Materials for UV inks under the Eu-*

PIA Exclusion Policy, to explain why materials subject to the Exclusion Policy might temporarily remain in the supply chain, as well as a new public document *Questions and Answers on the EuPIA Exclusion Policy for Printing Inks and Related Materials*.

Increased use of the exemption procedures provided in the Exclusion Policy has highlighted some areas where EuPIA could further reinforce its advice and support to members. ETC agreed to enhance its internal *Explanatory Note to the EuPIA Exclusion Policy* by inclusion of guidance on the key elements of risk assessment – a pre-requisite to obtain a temporary exemption. Recently EuPIA has established a new task force to review the terms of the Exclusion Policy and to identify where additional clarifications and recommendations would make its application easier and more consistent for member companies. In addition EuPIA will focus on improving communication about the value and benefits of the Exclusion Policy.

ETC monitors the technical and regulatory status of various 'substances of interest' to the printing ink industry. These include biocides (see article elsewhere in this annual report) and nanomaterials; regarding the latter, in November 2018 EuPIA published a statement about a literature study by the European Union Observatory for Nanomaterials (EUON) on the *"uses and risks of nanomaterials as pigments in the European Union"*. This study mentions such materials in the production and use of printing inks, however EuPIA concludes that there is no significant exposure of workers or consumers and therefore no risk.

Since 2014 EuPIA has participated in an industry task force developing guidance on safety assessment for cosmetic packaging, making use of information on FCM compliance to provide adequate information to safety assessors for cosmetic products. A final

draft guideline was tested in a large-scale trial of Cosmetics Europe member companies, the final outcomes of which were reported in May 2019. At the time of writing the guideline was in the process of formal endorsement by the board of Cosmetics Europe, before promoting it to relevant EU institutions. Ongoing maintenance will be required to track developments in the FCM legislation which underlies this approach, including its list of 'disclosable substances'.

Other product stewardship issues handled by the ETC or its LSDS group include, *inter alia*, safety of (printed) toys and exposure scenarios for safe use of printing inks. In 2018 EuPIA published an information note *Printing Inks as Industrial Mixtures*, clarifying the intended use of EuPIA members' products – useful particularly in the context of harmonised submissions to Poison Centres, the development and impacts of which are closely monitored by the LSDS group. ETC also maintains its cooperation with the graphic industry association Intergraf, to address jointly issues such as environmental impact of printing.

Promoting and measuring safety in operations

OSRA's mission is to support members and customers in operating at the highest levels of safety. The group continues to publish its popular Safety Alerts and Safety Flashes, with seven generated in the first half of 2019. Recurrent themes, such as fires and incidents with fork lift truck, are prioritised for guidance documents; in recent months the group has published new or updated guidelines on storage racking and electrostatic safety in the handling of flammable liquids, and at time of writing is concluding an update of its guidelines on safe handling of nitrocellulose raw materials and inks. The group also provides its expertise in operational safety and training in support of CEPE activities on substances, such as titanium dioxide (dust OELs) and diisocyanates (training materials for planned restriction). Safety performance indicators were again collected from EuPIA members for 2018, now making three consecutive years' data. OSRA is producing a summary of these data as a reference for members to benchmark their own performance against their peers. OSRA is now also reaching out to operational groups in the national associations to maximise engagement and alignment on safety matters. 📍

Artists' Colours

Under the banner of the European Artists' Colours Association EuACA (www.artists-colours.org), CEPE's Artists' Colours (AC) sector group works together on the important regulatory and commercial issues facing the industry and to enhance the image and credibility of the sector.

First European market survey on Artists' Colours

Inspired by the experience of the US organisation NAMTA, EuACA commissioned a market survey on the purchasing and use of AC materials in Europe. The study, managed by a market consultancy and conducted through online interviews between October 2018 and February 2019, was in two parts: one for re-sellers (retailers, wholesalers, distributors and institutions in 12 countries) and one for end users (hobbyists, professionals and students in 5 countries representing the majority of sales).

The results of the survey, which were presented at the EuACA annual meeting in May 2019, provided interesting and useful insights for AC producers on the sales and marketing practices of re-sellers and the factors that influence end users' purchasing habits, including social media and in-store experience. The role of animal products in AC materials or accessories was identified as an important point for consideration in the Technical Committee.

An ever-increasing technical agenda

The Artists' Colours Technical Committee (AC TC) meets twice a year and the number of participants grows steadily, reflecting the number and importance of issues facing the sector. Many of these are issues for CEPE more widely (see other articles in this report), but can be addressed in AC TC from the viewpoint of the sector's specificities, such as use patterns, low volumes and long shelf life. For example, in 2019 members of AC TC began participating directly in CEPE's Biocide Users Task Force and were able to contribute relevant insights for the CEPE/A.I.S.E. workshop with Member State authorities: regulators might otherwise not have considered the potential impact on the cultural life of Europe from a loss of effective preservatives for AC.

The issue of microplastics (see separate article) is likewise relevant for AC: although exempt from the proposed restriction on placing on the market, AC can be impacted by the communication and reporting requirements. In this context AC TC is reviewing and updating its 'Best practice in the handling and disposal of waste Artists' Colours and their packaging', originally published in 2017, to ensure it adequately addresses this new threat.



With its very small package sizes and mainly consumer market, the AC sector has a keen interest in the simplification of labels. In the past 12 months AC members have contributed substantially to work in UN GHS on digitalisation, including an informal document illustrating the potential benefits for AC (see Hazard Communication article) and direct participation by an AC member at the Sub-Committee session in Geneva for the discussion on 'practical labelling issues'. The participation of the European writing instruments association EWIMA in AC TC continues to be greatly appreciated. Both organisations continue to monitor following the decision by the European Commission in 2018 that pens require CLP labels where relevant; so far there has been no enforcement by Member States or pressure from ECHA to produce guidance, but questions from customers are expected to increase so we will develop advice for members as required.

AC products intended for children are also subject to the Toy Safety Directive 2009/48/EC, and the TC closely follows its legislative developments such as reductions in migration or content limits. EuACA provided input to a public consultation on reduced limit values for formaldehyde in toys for children under 36 months, voicing our concerns about analytical methodology and the resulting de facto ban on use of common preservatives such as Bronopol. The harmonised standards of EN 71 are also important, particularly Parts 3 (chemical elements) and 7 (finger paints): an AC TC member participates in the chemicals working group of the relevant European standardisation committee, CEN TC 52, and consults the TC as required. In Brussels CEPE also maintains contact and co-operation with Toy Industries Europe (our only access to the relevant committees and expert groups at the Commission). 🗣️

« The Artists' Colours sector
has a keen interest
in the simplification of labels. »

Can Coatings

Materials coming in direct contact with food are the focus of an increased attention from the external world



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Materials in direct contact with food are the focus of an increase in attention from the external world, can coating among others. Indeed, under the Framework Regulation 1935/2004 which sets general principles for all food contact materials, only plastics are specifically regulated. Materials made of glass, ceramic, paper and board, waxes, rubbers, silicones, textiles or can coatings are example of materials that are evaluated by Industry, and sometimes under some national schemes where they exist. As time passes our Society doesn't trust the job made by industry and/or do not like the existence of different national standards and would like to see more scrutiny in these areas as well. Hence, with the pressure from the EU Parliament the EU Commission started a program to evaluate the fitness of the Framework Regulation. COM therefore issued a roadmap, details can be found here: ec.europa.eu/info/law/better-regulation/initiatives/ares-2017-5809429_en

Therefore, a group of EU Associations (the Cross Sector Group) has been gathering together for the last 2 years to try harmonizing principles across Industry to communicate to the outside world. High level principles have been agreed in terms of trust and transparency, risk assessment and risk management, communication and strategy. CEPE Can Coating is part of the Joint Industry Group for our rigid metal packaging sector (the raw materials chemical manufacturers mainly in CEFIC FCA but not only, CEPE, Metal Packaging Europe and Food Drink Europe). This group exists for many years and is regularly meeting. Due to the above it has been increasingly active on different subjects:

- TSC 32 for the development of toxicological information on a specific NIAS (Non Intentionally Added Substance)
- TSC 33 for the development of a guideline on NIAS
- TSC 34 for the development of a Migration testing Guideline that is fit for our applications
- TSC 35 to work on the identification of existing working procedures within our supply chain and identify a strategy for a future trustable and workable compliance system

Our industry has therefore put significant additional efforts and increased the number of meetings and calls during the past year.

A lot is being done within our supply chain to demonstrate compliance with the Framework Regulation but this is complex and not transparent. The first step is to summarize then communicate what currently exists to COM and MS Authorities. This is ongoing and we have been able to present at some specific events already. The consultant used by COM to make an analysis of the situation is expected to present their findings in September and finalize their report later this year. From there on we will try making proposals on how we see possibilities of improvement for our supply chain, for instance the possibility to develop a database accessible to Authorities to allow them to access the risk assessments performed at each step of the supply chain. This is only one example of a possibility and is still only an idea, but it shows our commitment to work with Authorities within the existing Regulatory Framework and help COM avoid to have regulate specifically all these different food contact materials. 🗑️

DECO paints

PEF into the market

While the PEF Technical Secretariat continues to work on the final parts of the inclusion of environmental data, establishing performance classes and the validation principles, the DECO Sector Group makes up its mind on how the final PEF should ultimately be launched into the market.

PEF on its own or part of Ecolabel?

The DG ENV would like to see PEF finding a home into the framework of Ecolabel.

Although quite some Member States in the Ecolabel Board are not immediately in favor.

DG ENV has recently presented 5 options on a possible way of implementing PEF into Ecolabel.

CEPE has expressed its doubt on the proposed ways of incorporating. Some first screening at CEPE's members with 'approved Ecolabel product' did not always result in the better PEF scores. This will be first further discussed with DG ENV before a potential incorporation will be further researched.

The DECO Sector Group acknowledges pros and cons in the integration, but would not accept an integration that would violate the principles of comparing products on the basis of environmental impact. Whatever will result from these considerations the DECO Sector Group is well aware that an introduction needs a careful approach especially to have retailers accept the PEF as a performance label.

Leaching study on biocides

CEPE presented to the ECHA PBC WG Environment group the outcome of the laboratory leaching studies financed by CEPE already back in 2015. It took time to set up the extensive semi-field study with external panels and all identified external coatings, but this year the results of the 2 years outdoor leaching have become available in a draft report. The detailed analysis still has to be done before we go back to the Authorities, but we can already comfortably state that:

- Some actives degrade rapidly and hence their impact on the environment is considered negligible
- There clearly are outdoor coatings that can be set aside for future testing, which reduces future testing costs
- Biocide suppliers will in future develop a testing strategy for their PT7 products based on the worst case coatings identified and their selection of actives in their PT7 products
- The laboratory standard EN16105 is a worst case estimate and can hardly be used to properly estimate leaching values for risk assessment purposes, but can probably be used to compare different PT7 products.

Methyl-Iso-Thiazolinone (MIT); use as in-can preservative.

CEPE members have since 2014 voluntarily been using warning sentences on their labels for a possible skin sensitization by MIT when levels were above 15 ppm (or lower) in their paints. Now an official harmonised classification for MIT will become effective per May 2020 and waterborne paints containing more than 15 ppm of MIT



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will now have to carry the pictogram, signal word 'Warning' and the Hazard statement H317 'May cause an allergic skin reaction'.

Especially having to carry such a pictogram for the first time on consumer paints will be an obvious deviation from the past.

Alternatives to MIT

To avoid the MIT classification CEPE members may have tried to maintain effective in-can preservation via BIT (currently having a 500 ppm limit). However the BIT pre-cursor being only very limited available at this moment (production installation in China is out of order) makes a switch to BIT impossible and probably for another year. One is thereby forced to continue to use MIT.

Ecolabel impacts

The Ecolabel criteria for paints and varnishes mention that 'the final product shall not be classified and labelled'. So there will be an immediate conflict with the paint and varnishes formulations that use > 15 ppm MIT. From May 2020 onwards many would lose their Ecolabel approval.

And if in future other Iso-thiazolinones would receive the same Specific Concentration Limits the in-can preservation for Ecolabel paints will be very limited.

At the moment of writing this article the EU Ecolabel Board has assigned a consultant to see if a derogation would be defensible.

Evaluation under the Biocidal Products Regulation (BPR) still to come

There is more to come for MIT. The evaluation under BPR is likely to result in maximum limits of what a product may contain for consumers. CEPE together with the National Associations will do whatever is needed to make clear to the authorities that setting limits below effective levels means a ban of waterborne paint. The recently held Biocides Workshop (together with the Soap and Detergent industry) was a major step in bringing this message across. See the article on 'Biocides' in this annual report.

Poison centres notifications

The classification change above will bring many more Deco paints into the scope of CLP Article 45, i.e. mandatory submission of information for Poison Centres. Point-of-sale tinting systems will be particularly impacted, and it is important for a solution to be found to that particular workability issue. See Hazard Communication article for more details. ③

Marine Coatings

Anti-Fouling paints

Sustainable use of Anti-Fouling Paints.

Our members' anti-fouling paints (AFPs) application dossiers have been submitted for most and will be evaluated in the coming two years. In the meantime, CEPE could obtain from the Commission that a member company representative can attend the Coordination Group on its behalf to follow-up the BPR Product Authorization issues. Indeed, topics of general nature that apply to other biocides also will affect AFPs, such as the way to assess co-formulants of biocidal products, Biocidal Product Families, dermal absorption or any revision on the risk assessment for AFPs at national level.

An important topic for the future will be about the sustainable use of AFPs. The group has been working on the development of a brochure explaining why these paints are used, their benefits (reduction of fuel consumption, prevention of marine invasive species), alternative solutions and their limitations, the limited number of biocide actives remaining and the development of tolerance of fouling

organisms or best practice guidelines. The objective is to offer a source of information for Competent Authorities to get a good understanding of what these paints are for and how best to use them. It also highlights that the current biocide active substances in use have nothing to do with previously used persistent compounds such as TBT. Their safety in use can be demonstrated both for human health and for the environment, should reasonable approaches be taken such as the consideration of marinas as environment naturally disturbed by human activities. In the long-run, although researches continue to find alternatives to biocide containing AFPs, it is possible that the current AFPs will have to remain authorized under the BPR and their sustainable use will be needed.

Microplastics

At the International Maritime Organization (IMO) a formal Working Group has been established to discuss management of plastic waste from shipping. It will focus only on Macroplastic. This includes lost fishing gear,

garbage lost overboard, transported goods lost during transit etc.

But scrapping of hull coatings is something to follow closely.

Yacht paints

The anti-fouling paints for pleasure crafts are probably going to be most scrutinized by Member States. Some of them would like that a marina is considered a natural reserve, when it is clearly a man-made disturbed area. Marinas also have to be regularly maintained to remove the sediment to allow movements of boats. We will have to wait probably till the year 2020-2021 before we start hearing from the Competent Authorities who are evaluating the submitted dossiers. In the meantime a representative of the CEPE AF paint makers will attend the EU Biocide Coordination Group of MS and EU COM who are discussing several times per year in Brussels the issues arising with product authorization. There are issues of general interest that our members can learn from, for instance on the concept of product families. 🗨



Intumescent coatings

How can we address the lack of progress within the European Regulatory system?

The market sector had a frustrating time as we found ourselves further away from mandatory CE marking of Reactive Intumescent coatings for the fire protection of structural steel. Today, these challenges still remain, and I cannot really report any significant progress having been made with the relevant authorities over the last 12 months. Given that progress over the last 10 years to improve standards in the market has still predominantly come as a result of voluntary industry initiatives carried out by the CEPE community, we are now looking to plan further initiatives, which we hope that we can use as a springboard for regulatory change.

The market recognises the need for action

Fire safety in the built environment is a major concern, with increasing scrutiny within the market following the events at the Grenfell Tower in June 2017. Specifiers and Applicators are all now looking at fire protection with greater vigilance, and with a view to eliminating risk, and passing it to product manufacturers. However this still represents the enlightened customers, who are trying to improve standards. There still remains no regulations in place to prevent bad practices within our market.

Indeed, there has been no forward progress in the pan European attempts to gain a harmonised standard for passive fire protection products, including reactive coatings that would result in mandatory CE marking for intumescent coatings.

Mandatory CE Marking – long term goal

Mandatory CE marking is the cornerstone of our project to help to drive standards up within our market. Adoption of CE marking will bring all manufactured products into line ensuring they are properly tested and assessed, and that quality is maintained.

Our members continue to exert pressure wherever possible to encourage progress within the European Commission, however we remain frustrated by the lack of EC activity on this topic.



Last year we reported that efforts to obtain a mandate to make CE marking mandatory through a harmonised EN (hEN) had gone backwards since we were working on the wrong template. The correct template was eventually obtained in November 2018. However the new Standardisation Request template now contains a whole host of new Environmental Declarations and requirements. CEPE members have been working to try and understand this, but have had no feedback from CEN / EC.

We have recently been looking at our strategy. We have been pushing to separate the reactive coating Standardisation request from the other fire resistant products. CEN have agreed to this, but not pursued this action forwards. We will therefore continue to lobby for that separation, and also a separation of the topics within the Standardisation Ad Hoc Group (SRAHG).

We continue to find this situation frustrating, especially given that we as an industry have already prepared the draft texts for the necessary product standards. EN16623:2015 was our first voluntary standard, and we have now completed preparatory work revising this text into a multi part standard, covering a range of possible substrates including steel, aluminium, concrete and timber.

Meanwhile we continue to lobby the European

Commission to put in place a work programme to deliver the Standardisation request. We are also awaiting feedback from them on the review of CPR that they started over 24 months ago. It does at time seem that the topic of fire protection is too complex for the EC, and so they get lost in the detail.

Other Industry Issues

As mentioned above, environmental issues are coming more and more to the fore. European technical Assessments, produced to the new EAD 350402/00/1106 contain testing for indoor air quality,

as tested to a method similar to the German AGBb scheme. CEPE members were involved in the development of EN16402, which has now been published. We will be working to have this standard incorporated into the EAD text. Along with the new hEN environmental requirements, we also see EU member states preparing their own environmental databases, such as the action we discussed in the Netherlands.

There are also concerns, as mentioned previously about the quality of some of the Technical Assessment Bodies issuing ETAs and CE markings. We see questionable assessments being carried out by some TABs, and an ever increasing challenge at our meeting is the list of assessments and certificates that we have worries over. Most of these are sadly owned by companies who are not CEPE members. The market surveillance and enforcement authorities seem unwilling or unable to do anything about these unsafe assessments. In many cases the technical arguments are well beyond their capabilities.

Finally

This will be my last annual review as chair of CEPE ICTC, as I will stand down from the chair in 2020. I wish my eventual successor good luck in tackling the issues above.

A. Taylor Chair CEPE ICTC. ❏



Sustainability

The Product Environmental Footprint (PEF) pilot project was initiated by the EU COM in November 2013 with a main aim: to create a single market for green products. For this a Life Cycle Analysis (LCA) methodology would have to be created and endorsed by the European Commission and which would allow to evaluate under common product category rules various types of products. This was seen as a way to avoid a chaos of green claims and labels for products and their sustainability performance.

PEF; methodology; tool and training

The last 6 years, CEPE has been engaged in the European Commission's promising project on a Single Market for Green Products. At CEPE level, we really believe in Life Cycle Analysis (LCA) principles and we support scientifically transparent initiatives that help us identifying the environmental footprint of our products.

The Product Environmental Footprint (PEF) was the step towards that direction of transparency and harmonization across Europe. PEF is nothing more than just a methodology that can be applied to any product and its supply chain. CEPE has adapted it for the Decorative paints.

The pilot phase brought many deliverables and many actions for the next day since April 2018. For this reason, the CEPE members have access to the full category rules for Decorative paints via the European Commission's website, a free database and free models. There was a mandate by CEPE's Decorative Coatings Sector, to use these deliverables into something meaningful and easy to use by the CEPE members. The best way to take into account these deliverables was in a form of a tool, which was delivered as the CEPE PEF tool.

The CEPE PEF tool allows the user to follow a three-step data insertion process that leads to results for a single product. An overview of the steps is given below:

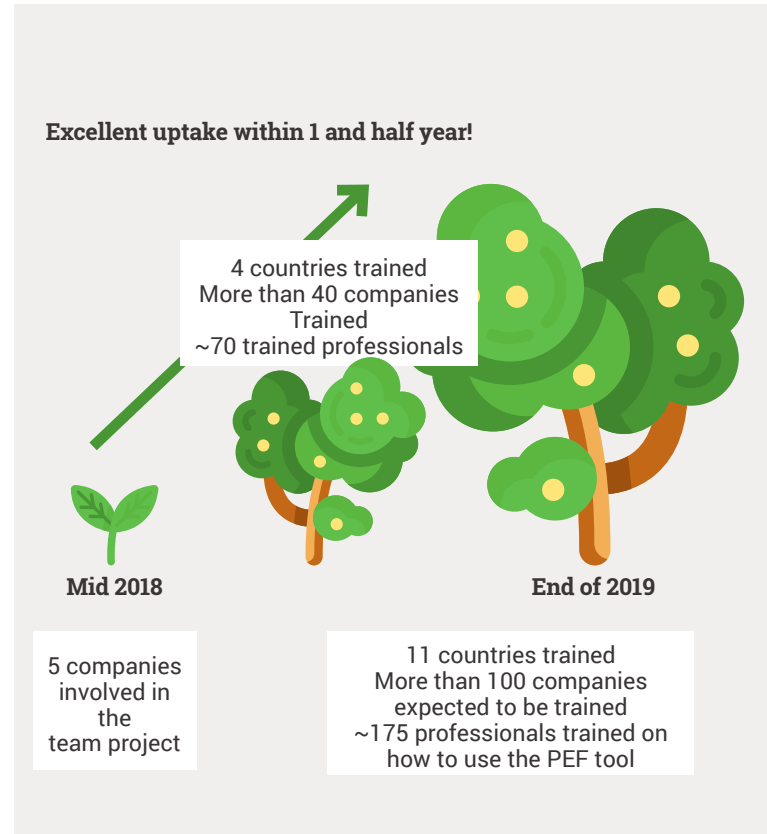
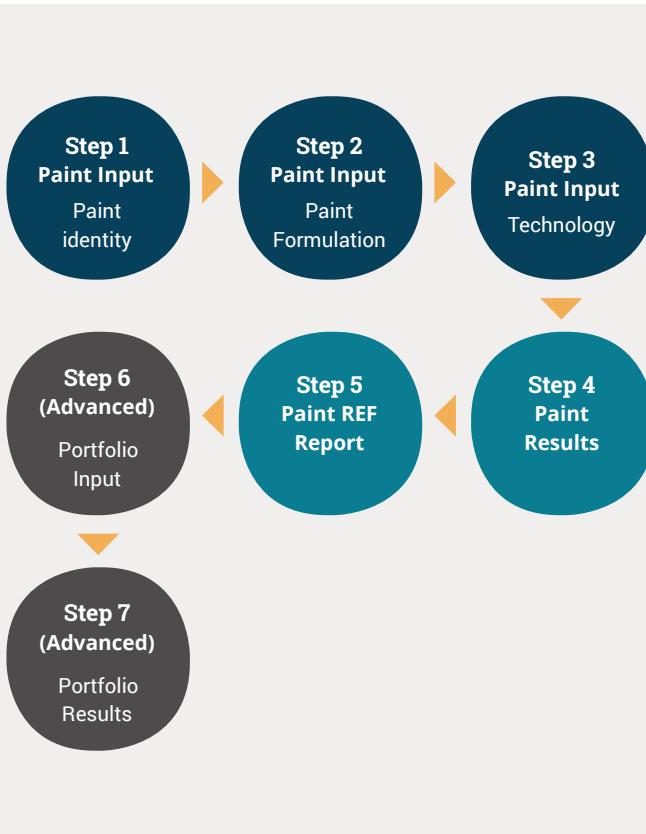
Once the paint producer inserts primary data for his product; like

- Bill of Materials,
- VOC content,
- results from PEF durability tests and,
- site specific data for the manufacturing of this product,

The tool produces the results in terms of PEF score and its 16 impact categories. The user can also set an analysis for up to

es with the type of data that needs to be collected and finishes with the training on the PEF tool.

The workshops so far had very good feedback with many interesting questions posed by the participants. The evaluation showed a high interest from the companies in PEF applauding the simplicity of the tool and the calculations. The questions for the future seems to be around the verification of the results and



50 different portfolio of products. This enables him to compare the different products in terms of PEF score and CO2 emissions. Not everything is finished yet. There are elements still missing like the inclusion of the Toxicity impact categories and the creation of Performance classes that would update the CEPE PEF tool to its final version. Till that moment, the PEF tool version will be called 'beta version'.

PEF workshops

There are training sessions on how to use the PEF tool and to understand the PEF principles and the needs of data collection. The sessions are organized per National Association and by the completion of this session, the user has access to the CEPE PEF tool.

During the first half of 2019, CEPE gave 4 workshops at National Associations. On average each workshop was attended by some 15 or 20 company representatives. It is foreseen that by the end of the year, more than 100 companies will be trained and more than 170 professionals will be able to make the calculation based on the PEF tool.

The workshop requires a full day of training that starts with the principles and the pilot project journey of PEF for Deco, continu-

the type of communication of them, whether it will be a performance label a fact sheet etc. These are questions that will soon be answered as CEPE has formed a dedicated group to form a strategy in order to achieve a unified solution for verification so that costs will be as low as possible for the Deco companies.

To the market?

The Deco Sector Group is weighing options on how ultimately the PEF should be brought to market.

See further in this annual report under Deco sector.

CEPE LCI project

Since 2012 when CEPE became dedicated to life cycle thinking. In order to do a life cycle analysis (LCA), it requires expertise and certain costs. One of the important costs is a database that is needed to use information behind each life cycle stage of the paint product. That is why the CEPE LCI project was created.

The LCI means life cycle inventory which is the data of the LCA. Currently 323 different raw materials have been available to the CEPE members and 3 different manufacturing processes. These data are offered into 3 different formats: SimaPro, Gabi and Excel. The CEPE LCI project requires an LCA expert in order to do the analyses for a product. For the companies that do not have an

expert, CEPE created the Ecofootprint tool. This tool was intended to be a user friendly LCA calculator that a user would use by inserting the bill of materials of the product and a few details for the manufacturing of it. The end result is a report for the environmental impacts of a product over its full life cycle from cradle to gate (from the extraction of raw materials to the gate of the factory).

For the coating groups of protective and powder the tool enables the users to have a full life cycle analysis by using the assumptions from the already published LCA studies ‘from cradle to grave’ (what happens after the gate of the factory).

More than 40 CEPE member companies have used the CEPE LCI data.

The next update is foreseen this autumn in order to harmonize and evaluate the needs for new raw materials. Another option that will be evaluated is to allow the users to have more reporting outputs for example EPD like or with better and more up to date environmental indicators.

EPD changes

Environmental Product Declarations are used by companies in order to communicate an environmental impact of a product. The paint products follow the same principles especially the ones that are relevant to the construction sector like for example Decorative, Powder and Protective Coatings. The construction sector in Europe uses various schemes to describe an environmental impact, but on European level the most well-known scheme is EN 15 804.

This norm was mandated since 2004 and was released 8 years later in 2012. Since then, environmental issues have evolved and the Commission did not support the way that the norm was formed in the end.

Since then, the Commission came with a new mandate asking for a list of issues to be addressed in a new EN 15 804 norm by the construction related community. One of the clear messages was to align as much as possible the new norm with the Product Environmental Footprint method and its principles.

The main changes that the Commission asked:

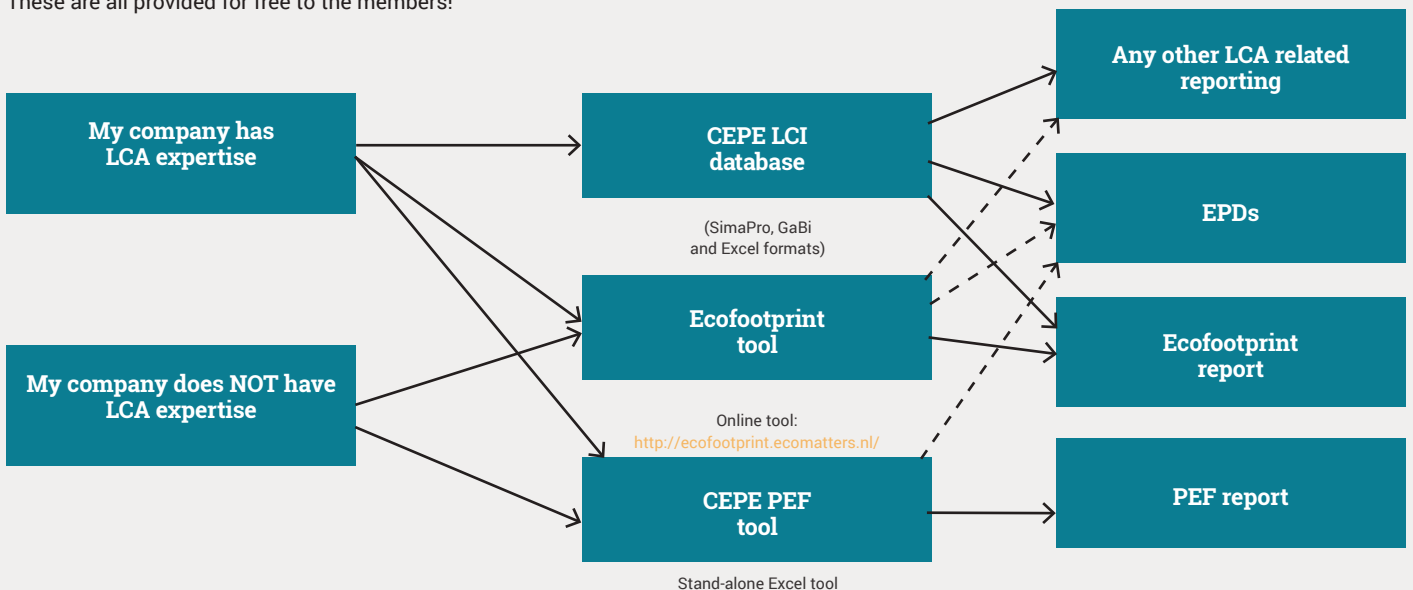
- To cover all life cycle stages (from cradle to gate)
- Receive benefits for recycling
- Impact assessment methods and characterization factors align with the PEF ones
- Rules on how to model biogenic carbon aligned same way as PEF does
- ILCD/EF way of modelling the data (nomenclature and format) becomes mainstream.

What comes next?

Since the end of last year, the contributions of the construction community were seen as very positive by the European Commission. On 21 June 2019, a substantial revision of this standard has been accepted after a formal vote by the European Committee for Standardization (CEN). EPD users will have to assess the changes and start communicating life cycle impacts of their products based on the new norm. CEPE is closely monitoring this aspect and will inform the members accordingly. 📍

What does CEPE offer you?

These are all provided for free to the members!



Circular Economy/Extended Producer Responsibility

Although Circular Economy is more than dealing with the waste it will for paintys mainly come down to this part. With the revision of the EU waste legislation in 2018, products from our sector are newly considered as hazardous household waste. Member States will have to set up separate collection by 1 January 2025. At the same time, producers will have to bear more responsibility once Member States have set up the required extended producer responsibility schemes (EPRS) for all packaging.

EPRS comes down to those who place products on the market have to take over the financial and/or organisational responsibility for the end of life management of their used products. This will include the consecutive steps of collection, sorting and treating of the waste (recycling or disposal).

By incentivising environmental life cycle thinking, EPRS are promoted to help reaching recycling targets (see table) and to reduce the environmental impact. It will trigger improved product design and the avoidance of unnecessary packaging.

EPRS across Europe

The first principals of this concept were introduced in the 90'. Today, the legislative framework at the European Union level is

composed of the Waste Framework Directive and specific directives (for electrical and electronic equipment (WEEE), end-of-life vehicles, batteries and accumulators). At Member States level, several EPRS are used for packaging and other waste streams, however in the absence of harmonized requirements until 2018, only with varying levels of effectiveness. The 2018 revision calls for EPRS for packaging, and introduces a definition and sets minimum requirements.

How does EPRS work in practice?

Most mandatory EPR schemes, such as those covered under the EU WEEE, are fee-based models. The producer pays an upfront fee proportional to how much product they place on the market, and this levy helps fund the collection and recycling infrastructure needed. Producers have the option to set up and manage their own EPR scheme, but most choose to delegate this responsibility to a third-party organisation by signing up to a collective compliance scheme.

These so-called Producer Responsibility Organisations (PRO) usually maintain the necessary infrastructure for the collection, or take-back, and the sorting of the waste. PROs are usually non-profit collective entities, set up and fully owned by the industry

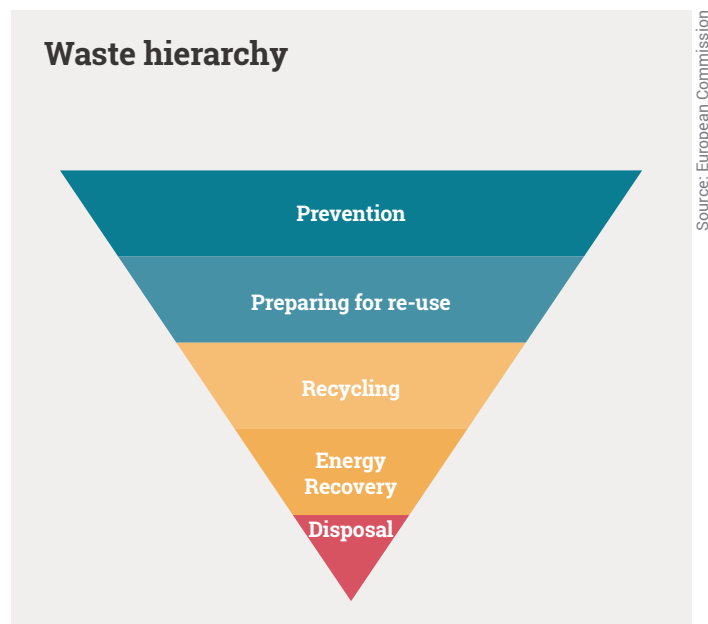


that is bound by legislation. Thereby, PROs become responsible for meeting recovery and recycling obligations on the industry's behalf.

CEPE to address EPR

EPR can be implemented in many different ways. When establishing national EPRS for packaging, Member States will likely consult with industry. For this occasion, engagement might be particularly relevant to ensure the workability and to minimize potential disadvantages, e.g. higher product costs, costs for establishing new collection routines, and limitations for various products in market entrance. 📌

Targets for the reuse and recycling	By 2025	By 2030	By 2035
Municipal waste	55%	60%	65%
All packaging	65%	70%	
Plastic	50%	55%	
Wood	25%	30%	
Ferrous metals	70%	80%	
Aluminium	50%	60%	
Glass	70%	75%	
Paper and cardboard	75%	85%	



IPPIC-WCC

Global dealings for industry issues with a global character.

CEPE normally operates within the EU scope. But for some issues it makes sense to co-operate on the global level where issues are originating from the UN or any international organisation or because the nature of the issue is not limited to the borders of the EU.

IPPIC (the International Paint and Printing Ink Council) represents the interests of the industry on an international level and provides a forum for information exchange and cooperation on the major issues and priorities of the paint and printing ink industries worldwide. Other countries outside EU that actively participate in IPPIC are: the USA; Canada; China; South Africa; Mexico; Japan; Australia; New Zealand; Turkey and Brazil. The 2019 annual meeting was hosted by the French association FIPEC in Paris.

At the Paris meeting it was agreed that a more appropriate name for IPPIC would be World Coatings Council. Which will be effective from 2020 onwards.

Topics currently being treated under IPPIC are:

- **Nanomaterials** IPPIC participates in the relevant ISO bodies to convey the voice of the paint and ink industry during the development of tests and norms around nanomaterials and their analysis.
- **Responsible Mica Initiative (RMI)** The supply chain for Mica and the production of Mica-derived pigments is a global one, and Indian mines are an acknowledged source (of Mica) for raw material producers serving the paint industry and its eventual end-users (car producers mainly). In some of these mines the Mica is obtained via child labour. IPPIC is a member of the RMI and supports advocacy and efforts to affect a change in the practice of child labour.
- **Lead in paint** IPPIC endorsed a continued participation in this UN effort, acknowledging that the use of lead in paints is regulated in the countries of the IPPIC members. The participation comprises data supply and substitution recommendations. The UN Environmental Programme and World Health Organisation's Lead Paint Alliance (UNEP/WHO LPA) maintains a dedicated website at: <http://unep.org/chemicalsandwaste/LeadandCadmium/LeadPaintAlliance/tabid/6176/Default.asp>
- **TiO₂** The ongoing EU discussion on the classification of TiO₂ is also discussed inside IPPIC. Where EU discusses this under the CLP regulation it may have global consequences for interpretation of GHS.
- **Biocides** Although not treated in exactly the same way Biocides are under scrutiny at every region of the globe. IPPIC provides a general policy paper on the role and benefits of biocides in our society.




- **Microplastics** Plastics and littering is a globally recognized issue. IPPIC also here provides a general policy paper on explaining the issue so the national association may have a harmonized message to their authorities.

- **Marine Coatings** Anti-fouling paints and the treatment of Ballast Water Tanks (effects on the inside coatings) are important issues across the globe. Since 2007, IPPIC has been granted the status of official consultative NGO to the IMO (International Maritime Organisation - London). IPPIC supports three IMO (sub) committees through technical input and meeting participation:

- the Marine Environment Protection Committee,
- the Maritime Safety Committee, and
- the Sub-Committee on Carriage of Cargoes and Containers (see also Transport article).

- **Transport of Dangerous Goods (TDG) and the Globally Harmonized System (GHS) of classification and labelling of chemicals**

IPPIC has consultative status as a non-governmental organisation at the United Nations' Economic Commission for Europe, and as such participates actively in the Sub-Committees of Experts on TDG and GHS which meet in Geneva twice a year, as well as many of their delegated correspondence groups. IPPIC delegations are headed by CEPE's Director Product Regulations, with additional support from US staff, a consultant and now also occasional representation from member companies. E-mail communication and periodic web/telephone conferences enable coordination of positions and mandates across the global IPPIC community.

IPPIC achieved some welcome successes in the Sub-Committees at the conclusion of the 2017-2018 biennium, and continues to engage in topics of relevance for 2019-2020. For more details of activities see the sections on Transport and Hazard Communication in this annual report. 



Servowood Project – weathering tests continue

From January 2014 until December 2016 a Consortium of Research Institutes and SMEs and their associations ran a project with the objective to improve the predicting of the life time of coatings on wood. From a total of 3800 panels of coated wood the responses were evaluated after these panels had been submitted to a variety of doses (amounts) of typical weather parameters: (UV light, water and temperature). Both in real outdoor conditions as well as in accelerated weathering in the laboratory.

The essence of this project was studying the degradation of coatings that results from the exposure to the different doses. The resulting changes in physical characteristics were observed and linked to the coating’s capability to protect the wood.

A host of data has been gathered for variables like wood surfaces and coating qualities.

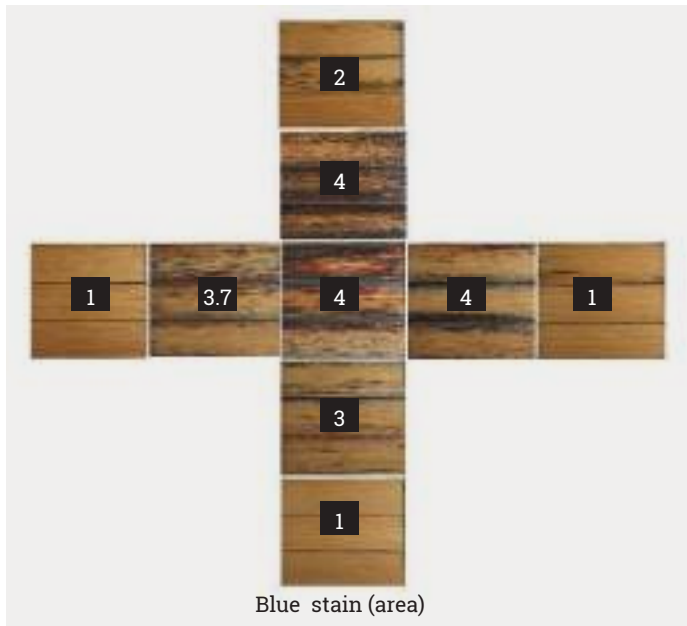
With the modelling of the data the paint producer can better predict the service life of his paint via a factor method based on the established formula (see figure below):

Extending the weathering tests enabled by sponsors

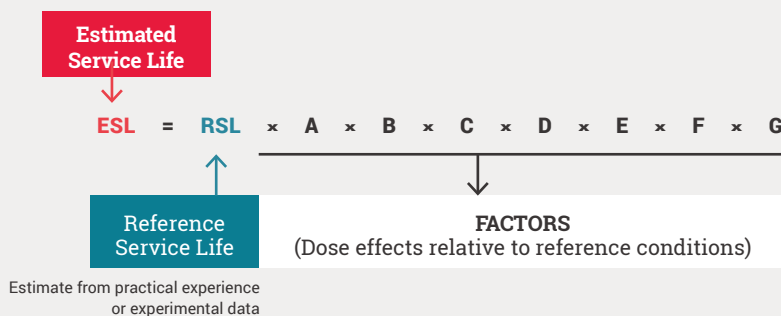
By December 2016, the Servowood project officially ended while the financing from the EC came to an end. The scientists from this project would like to extend the weathering test of the panels that so far were only exposed for 18 to 24 months. Such short exposure does not yet reveal the limit state of most coatings and therefore more data on coatings degradation could be obtained when the weathering of these panels were to be extended. CEPE was

able amongst its members and a couple of resin suppliers to find sponsors to continue with the outdoor weathering tests at three sites in Europe. Results of these extended weather tests will consolidate the factors in the service life prediction model and also improve the accuracy of the extended service life predictor.

By mid-2021 the panels will have a history of 48 months exposure. The panels are stored on on Multi-Faceted Exposure Racks to monitor influences of geographical orientation and angle of exposure. ④



ISO 15686-8 Factor method: concept



FACTOR	FACTOR CATEGORY
A	Inherent performance level
B	Design level
C	Work execution level
D	Indoors environment
E	Outdoor environment
F	Usage conditions
G	Maintenance level

Derived from experimental data (Outdoor and lab exposures)

Active Standardization bodies for Paints

CEN TC 139 : Paints & Varnishes

WG 1

Coating systems for masonry

SC10

Reactive coatings for fire protection

WG 2

Coating systems for wood

WG 12

Test methods & interpretation of test results of corrosion protection systems

WG 7

Paints & varnishes for wood furniture

WG 11

Sampling, conditioning and testing of paints and coatings according to the needs of CEN TC351 / WG2, Indoor air

WG 8

Powder organic coatings for hot-dip-galvanised steel products

WG 9

Testing of coil coated metals

WG 10

Microbiology and leaching of substances



ISO TC 35 : Paints & Varnishes

WG 1

Volatile Organic Compounds

SC 10

Test methods for binders for paints and varnishes

WG 2

Terminology

SC 12

Preparation of steel substrates before application of paints and related products

SC 9

General test methods for paints and varnishes

SC 14

Protective paint systems for steel structures



CEPE Board Members

The European Council of the Paint, Printing Ink and Artists' Colours Industry strengthens the position of the paint, printing ink and artists' colours industries in Europe. It is run by a Board of 15 company representatives.

Harald Borgholte
BASF Coatings



Position in Company:

Vice President,
Strategic Marketing & Product Development BASF. Member of the Global Senior Steering Committee

CEPE Board Member

Since 2014

CEPE Chairman

Since 2017

Other association responsibilities/experiences

Member of Board of the German paint and ink association since 2019.

André Vieira de Castro
Argacol



Position in Company:

CEO

CEPE Board Member

Since 2015

CEPE Treasurer since 2018

Other association responsibilities/experiences

Board Member of the Portuguese paint association APT.

Herbert Forker
Siegwerk Druckfarben



Position in Company:

CEO

CEPE Board Member

From: 2006-2012 and since 2014

Other association responsibilities/experiences

Member of the EuPIA council
Former VdL Board member

Heiner Klokkers
Hubergroup



Position in Company:

CEO; global development and strategy

CEPE Board Member

Since 2017

Other association responsibilities/experiences

Chair of the EuPIA council

CEPE Board Members

Daniel Llinas
Industrias Titan



Position in Company:
CEO

CEPE Board Member
Since 2017

Other association responsibilities/experiences
Board Member of EURIMA,
European Insulation Manufacturers Association.

Michel Kranz
BICCS



Position in Company:
CEO and owner

CEPE Board Member
From: 2006-2012 and since 2017

Other association responsibilities/experiences
Board Member (Vice-chair) of the
Dutch paint and ink association VVVF

Board Member of the
Dutch chemical association VNCl

Roald Johannsen
PPG Industries



Position in Company:
Vice president, automotive coatings, EMEA,
as well as the executive responsible for
PPG Turkey and Russia.

CEPE Board Member
Since 2018

Paula Salastie
Teknos Group



Position in Company:
CEO and owner

CEPE Board Member
Since 2018

Other association responsibilities/experiences
Board member in Datacenter Finland Oy,

Tulikivi Plc and Association of
Finnish Chemical Industry

Chairman of the Board of Association of
Finnish Paint Industry

Supervisory Board Member of
Elo Mutual Pension Insurance Company and
Finnish Family Business Association.

Ruud Joosten
Akzo Nobel




Position in Company:
COO; Executive Committee

CEPE Board Member
Since 2015

Other association responsibilities/experiences
Former Boardmember of the
Dutch paint and ink association VVVF.

Board Members for re-election




Till Iversen
Imparat Farbwerk

Position in company:
CEO

CEPE Board Member
Since 2016

Other association responsibilities/experiences
Vice-chair of Northern division of VdL




Geoff Mackrill
Teal & Mackrill

Position in company:
Managing Director

CEPE Board Member
Since 2016

Other association responsibilities/experiences
Board member of the British Coatings Federation.

Entering Board Members




Loïc Derrien
Cromology

Position in company:
CEO

Other association responsibilities/experiences
Board member of the French Paint and Ink association FIPEC/SIPEV


Co-founder of EcoDDS, the French Environmental Body for Chemical Waste Management



Giovanni Marsili
San Marco Group

Position in Company:
Chief Scientific Officer and Head of R&D

Other association responsibilities/experiences
Board member of the Italian paint association Assovernici (Vice President).



Klaus-Georg Gast
Axalta Coatings

Position in Company:
Business Director
Powder Coatings Europe

Other association responsibilities/experiences
Participant in meetings of VdL.

EU Sector Group Chair persons



Can coatings

Neil Finley
Grace Darex
Germany



Coil coatings

Pasi Niemisto
The Valspar Corporation
Finland



Decorative coatings

Thierry Destruhaut
Technical Marketing & Innovation
PPG Architectural Coatings
The Netherlands



Marine coatings

Bjorn Tveitan
Scandinavia Jotun Coatings
Norway



Powder coatings

Bjorn Karlsen
Jotun Powder Coatings (N) AS
Norway



Artists colours

Ronald Benning
Royal Talens
The Netherlands



Protective coatings

Gerard de Vries
AkzoNobel
The Netherlands



Vehicle refinish

Peter Maassen van den Brink
Valspar
The Netherlands



Printing inks

Heiner Klokkers
Hubergroup
Germany

www.cepe.org
www.eupia.org
www.artists-colours.org

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Managing Director



Janice Robinson

Product Regulations Director



Didier Leroy

Technical Director



Olympia Dolla

Regulatory Affairs Officer



Sebastian Kraußlach

Public Affairs Manager



Romy Möhrle

Communication Manager



Carine Willems

Managing director's assistant



Zita Gacser

Working Group Assistant



Marie Nyemba

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