

CEPE

ANNUAL REPORT

2020

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



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New website!

Every now and then, people like to give their homes a new coat of paint. This helps to make it prettier and protects value. Our home is our website and indeed, we brushed the walls and repainted. The result is a new look, but it is more than that. Our new communication platform provides more information about our sector, our issues and our commitment. Today, an informative online presence is a prerequisite to create trust and to create understanding for our opinions. Thereby, the new website will support our engagement with stakeholders and decision-makers. We invite you to experience our new website.

Masthead

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Christel Davidson
Managing Director
CEPE

Dear Reader,

It is a great pleasure for me to present you this year's annual report, which is also my first as Managing Director of CEPE.

Since our previous report the context, in which we live and our businesses operate, has changed dramatically. Covid-19 has unevenly affected our members: some have seen their businesses thrive, while others have had to lay off staff temporarily. Looking ahead, the landscape of our industry is set to change in the coming months and years. On the political level, the EU has risen to the occasion by successfully negotiating an unprecedented recovery package to support the EU economy and our businesses. An economic recovery that will be slow, "green" and "digital". The European Commission has reiterated its commitment for Europe to be carbon-free by 2050 and sees the green transition and the digital transformation as means to relaunch and modernise our economy.

It is important for the paints, printing inks and artists' colours sector to embrace the green and digital challenges. We will consider these challenges, especially those now being translated into law, in our two new working groups. Nevertheless, our initiatives, in the area of life-cycle analysis, clearly demonstrate that our sector has already embarked on the route to sustainability.

Coatings are intrinsically a sustainable product, and building on the technical work of CEPE, our focus will be to further engage with EU decision-makers and stakeholders to raise awareness about the positive role of our industry in their quest for a sustainable and green EU.

To do this, the members can count on the CEPE staff which early 2020, underwent major changes with the departure of Olympia, Janice and Jan. However, we were fortunate to retain Carine, Didier, Marie, Romy, Sebastian and Zita and are happy to have welcomed Kristien de Pauw and Karthik Ashok Kumar.

Despite these turbulent times, I am optimistic that the coatings, printing inks and artists' colours sector and CEPE will come out reinforced.

Stay healthy!

A handwritten signature in blue ink that reads "C. Davidson" followed by a horizontal line.

Christel Davidson

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“

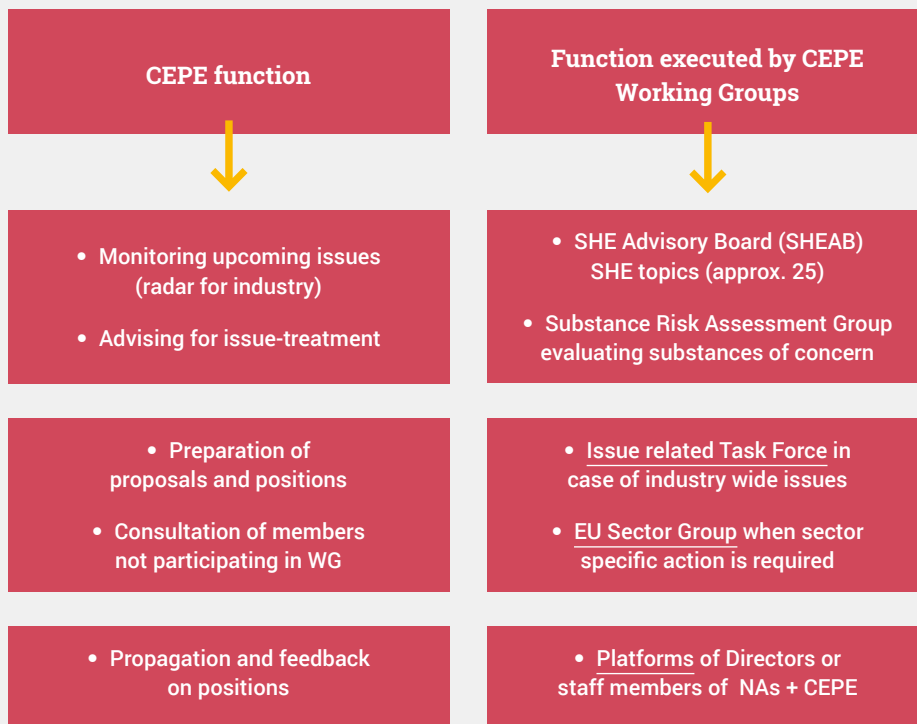
CEPE or EuPIA represent the interests of its members at:

- 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).



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CEPE functions and assigned Working Groups



Active standardisation 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



Reach

Although Europe stands as an example for the world with this legislation, the pressure on chemicals is still growing inside our borders.

The issue

REACH stands for **Registration, Evaluation, Authorisation of CHemicals**. Although the title does not incorporate it, REACH can also restrict the placing on the market and use of chemical substances.

All these activities can have an impact on our industry and are monitored. As for CLP the issue is not so much about new legislative developments but about compliance, implementation and enforcement. Although Europe stands as an example for the world

with this legislation, the pressure on chemicals is still growing inside our borders.

The EU political environment

REACH is now well established and all relevant chemical substances have been registered by suppliers (we are mainly downstream users). The ECHA database is estimated to contain some 25,000 substances. Currently, Europe has the biggest database on the safety of chemicals in the world. Nevertheless, chemicals remain in the spotlight, in particular in the

framework of the Green Deal and the chemical strategy for sustainability (see article on page 42).

The evaluations of some of the submitted dossiers started in 2012 and will continue for decades considering the current rhythm of maximum 50 substances per year. This is deemed to be too slow and there is increasing pressure to find solutions, such as grouping similar chemicals to avoid 'unfortunate substitution'. The quality of the dossiers is also questioned.



Under restrictions the European Commission is now taking broad approaches to target multiple chemicals at once, as for the restriction on the placing on the market of textile, leather, hide and fur articles containing skin sensitising substances, the formaldehyde and formaldehyde releasers in articles or the microplastics (see article on page 14). The restriction on di-isocyanate is also broad and encompasses dozens of these substances (see article on page 11).

With regard to the authorisation activities, there are now 209 substances on the candidate list for authorisation, some of which were subject to many discussions. Indeed,

the status of Substance of Very High Concern (SVHC) - a first step before the Candidate list - is purely based on hazard, not on use and risk, and has a 'black-listing effect'. Increasingly this is used to remove substances from the market as an authorisation process is burdensome and slow for both industry and authorities. This is an unfortunate development as it shows the increase of an hazard based decision making compared to a risk based approach.

Polymers have been exempted from Registration as their monomers are all registered. However, the European Commission now wants to have a series of polymers also registered, the so called 'Polymers European Requiring Registration'.

Compliance in the supply chain remains a hot topic with a lot of activities. Indeed, proper flow of ongoing information is needed from the REACH registrants until the end users. The information is complex to pass down the chain and tools are still under development.

What can we do and how

CEPE carefully monitors the various activities under REACH and these are discussed in a dedicated group named REACH Panel, among others.

CEPE created dedicated internal Task Forces to deal with important dossiers such as the microplastics or the di-isocyanate restriction. CEPE is also involved in providing input during public consultations and is following up with interest the development of polymers requiring registration.

The second review of REACH in 2017 concluded that REACH was meeting its objec-

tives and generally effective, but that there were opportunities to improve and simplify its implementation. The review yielded a series of 16 actions; CEPE, as such or as part of the Downstream Users of Chemicals Coordination Group (DUCC) is involved. We can therefore contribute in the effective implementation of REACH in order to help our industry to comply.

What have we achieved

For the specific dossiers on microplastics and di-isocyanates see the separate articles on page 11 and 14.

With regard to compliance, activities have taken place under Action 3 of the REACH review:

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 have been worked out, tested and evaluated in 2020 and beyond. CEPE and DUCC are key participants. This action is closely linked to the activities of the Exchange Network on Exposure Scenarios (ENES) (see below), and it is important to maximise use of those tools and avoid yet more different solutions being invented.

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 Roadmap 2013-2018, the outcomes of which are now being taken further in the ENES Work

« Compliance in the supply chain remains a hot topic with a lot of activities. »





Programme, 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 was a lead organiser of the ENES 12 event that took place on 21 November 2019 in Brussels. The goal of this event (about 150 delegates) was to promote, demonstrate and improve understanding of the numerous tools already available. To elaborate on just a few:

- **Use map packages** were developed by downstream user sector organisations to provide standardised 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. CEPE is still involved with ECHA to check the quality of the implementation of these within the ECHA assessment tool CHESAR.

- **ExS for communication:** DUCC has been a key player in developing solutions to make exposure scenarios (ES) 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 still working on harmonisation 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 package underwent in the past year an update and improvement, including high-quality pictograms commissioned by DUCC, inclusion of environmental information (for professional uses) and revisions to the guidance. Additional differentiated SWEDs/SUMIs are also in development for certain technologies (e.g. UV products), and a guideline was developed in conjunction with SubRAG (see article on page 12) to help members refine assessments and SUMIs for specific mixtures or uses where required.

« Despite its long existence there are still many activities ongoing. »

What are the remaining steps

REACH is the major EU legislation ever implemented and despite its already long existence there are still many activities ongoing. With increasing pressure on synthetic chemicals, we will have to carefully follow future developments and get involved to continue supporting our industry where and when needed.



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Titanium Dioxide (TiO₂)

The issue

In 2016 the French authorities proposed a classification for carcinogen by inhalation category 1 (the worst), for all forms of TiO₂, hence bypassing the full evaluation of the REACH dossier. The consequence of this Category 1 classification would have been huge for our industry as this pigment is used in most paint and printing inks as the best white like scattering and UV protecting opaque pigment. There is no equivalent substitute. In addition to the perception problem, a Category 1 triggers several regulatory consequences such as, a ban of consumer goods and a classification as SVHC (Substance of Very High Concern) under REACH, which is the first step towards a phase-out in Europe.

TiO₂ has multiple applications. Our industry is the number one user in terms of quantity, but TiO₂ also finds applications in plastics, paper, rubber, ceramic, toys, toothpaste, cosmetic (also in sun cream to protect against skin cancer), pharmaceutical, food additives, etc.

The EU regulatory and political environment

This dossier was a CLP dossier (Classification, Labelling and Packaging of substances and mixtures Regulation 1272/2008). The classification of a substance is based sole-

ly on its hazard. There is no room for arguments linked to exposure, risk in use or socio-economic impact.

A CLP dossier is evaluated by the European Chemicals Agency RAC Committee (Committee for Risk Assessment). This Committee is chaired by ECHA and composed of toxicological experts of Member States. These experts are not experts for all toxicological issues so when a certain endpoint is discussed not all speak up. A public consultation always takes place before the discussions in the RAC and never after. Hence, a substance can enter RAC with a certain proposal and come out with a totally different outcome, which is not open to public consultation anymore. The process is quite unpredictable, and experience shows that most substances come out with a worse classification (*see figure next page*).

What did we do and how

For three years, TiO₂ has been the number one dossier for us: exemplified by three internal task forces with about 100 meetings/calls, preparing e-mails, documents, presentations, letters, input to public consultations, and participation in official meetings. Also, we led a coalition of downstream users in close collaboration with the association of TiO₂ manufacturers.

In September 2017 RAC decided against a Category 1 classification. Instead TiO₂ would be classified as a Carcinogen Category 2 by inhalation only (no issue for dermal and oral exposures). However, this still triggers the classification of mixtures containing 1% (w/w) and more, which is always the case for TiO₂ used in our products. It goes without saying that the impact on public perception of the sentence 'Suspected of Causing Cancer' would have been disastrous.

The positive outcome was made possible, by engaging early in the process with the European Commission and by explaining to them the nature of the problem and the impact in case no solution would be found. This led to the European Commission's decision to reduce the impact by derogating liquids. Despite all our subsequent efforts their position did not change further. Member States can of course challenge the European Commission position but only a couple were clearly standing against the classification. All the others asked the European Commission to try to reduce the undesired impact, while still supporting that CLP was the best regulatory route to address the concern.

What was the concern? This is the first time that an inert dust was proposed for classi-

« It is difficult to explain the difference between hazard and risk to the general population. »

fication as carcinogenic. Indeed, TiO₂ is an inert solid with poor solubility and has no intrinsic toxicity. It is chemically neutral when present in the body. The effect observed in rats is linked to the overload of lungs. At unrealistic concentration levels of dust particles, the lung natural clearance mechanism cannot remove such quantities. If that occurs during the lifetime of a rat, the presence of the solid particles causes inflammation and chronic inflammation causes the development of lung tumors. Can this realistically occur with humans? In the presence of dust mist one would protect oneself by moving away, which the rats could not do in the laboratory.

Too much dust in lungs is not good for humans, hence the reason why all Member States have adopted maximum concentration limits at the workplace (OEL). This protects workers of chronic exposure. We strongly believe that a chronic exposure to high levels of dust is unlikely for other categories of the population. Therefore, we are of the opinion that this concern should

have been solved through the legislation on safety at work only and not by CLP. Our view was supported by several Member States. Unfortunately, other Member States took a conservative approach.

What have we achieved

We have obtained that liquid mixtures are exempted from classification. The classification only applies to powder forms, as explained in the classification entry in its Note 10. This will certainly help all the decorative sector which sells products to consumers.

Indeed, it is very difficult to explain the difference between hazard and risk to the general population. It is not because a substance is classified hazardous that there is a risk when using it. Following a survey carried out in the UK, a consumer would have thought that by opening a can of paint, they would be at risk to develop cancer, which is totally wrong. Unfortunately, CLP does not allow that differentiation which would have caused misunderstanding and miscommunication.

In order to address their remaining concern when spraying paints, the European Commission has invented a new EUH 211 sentence: 'Warning. Hazardous droplets may be formed when sprayed'. This sentence must appear on the labels of liquid paints.

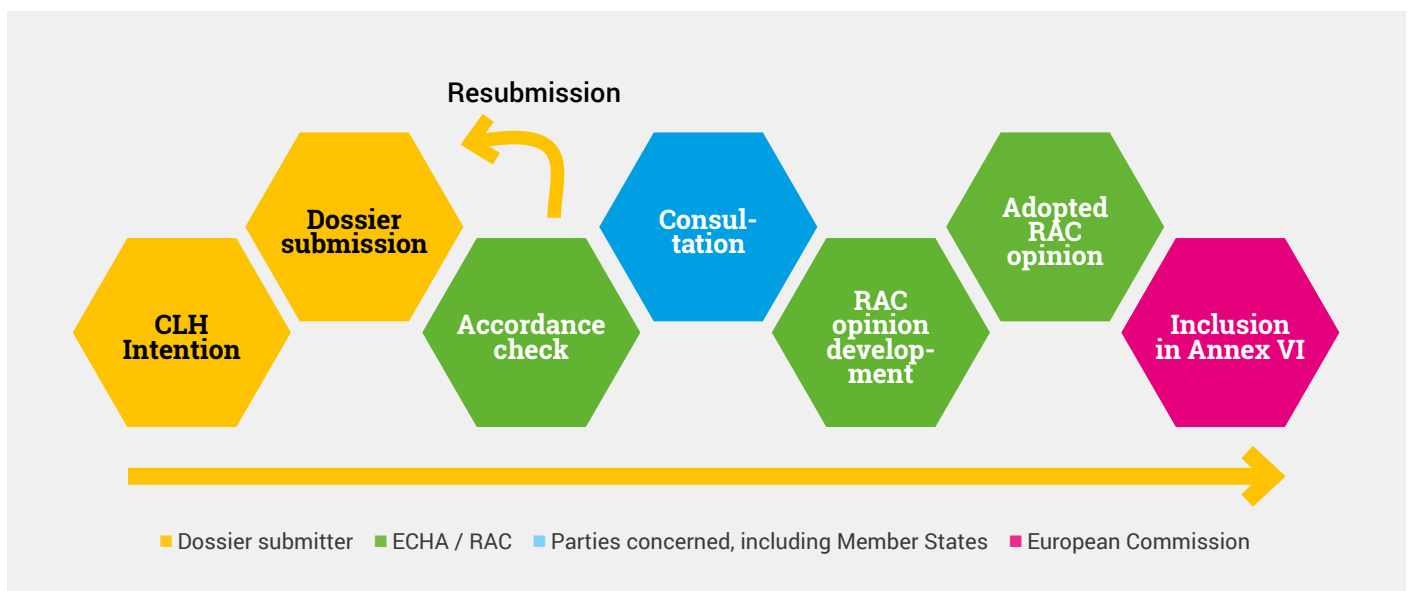
What are the remaining steps

TiO₂ is now officially classified in the 14th ATP to CLP. The deadline for complying is 1 October 2021. We have worked hard to clarify when and how a powder coating falls under the scope and helped manufacturers to fine tune their classification guidance. The waste remains an open issue as the European Commission did not find a way to close it before adopting the classification. Also, several derogations will be needed such as for the ecolabel, toys or cosmetics.

A few court cases have now been filed with the objective to cancel the classification. It will not be suspended, hence re-labelling is ongoing. It will take at least two years for a decision of the European Court of Justice.

Unless there are new developments in the next two years, this will be the last time TiO₂ will be covered in the annual report. [↩](#)

Steps of the CLH process



Di-isocyanates

The issue

Di-isocyanate substances are respiratory sensitisers (cause occupational asthma). Some Member States initially intended to use the REACH authorisation route to regulate them, which would have meant, potentially, a ban of this essential polyurethane chemistry in Europe. Germany realised that this would have been quite extreme and therefore, decided to use the REACH restriction route instead provided that professional and industrial users would first follow a mandatory course before starting to use such products.

The EU regulatory and political environment

This is a REACH dossier. The pressure on respiratory sensitisers can be very high as they can potentially be fatal if the exposure is too high. Furthermore, once a worker has been sensitised (s)he has to stop exposure, i.e. do another job/task. The REACH authorisation route is a possibility to regulate them but so is the restriction route.

The polyurethane chemistry is extremely useful for society (insulation panels of building, mattresses, resistant coatings, etc.) which makes it easier for authorities to realise that there may be other regulatory routes to address their concern.

What did we do and how


The di-isocyanate manufacturers have been leading this issue for years. CEPE has been supportive in many instances together with other downstream user associations, working together in the form of a memorandum of understanding. The restriction has always

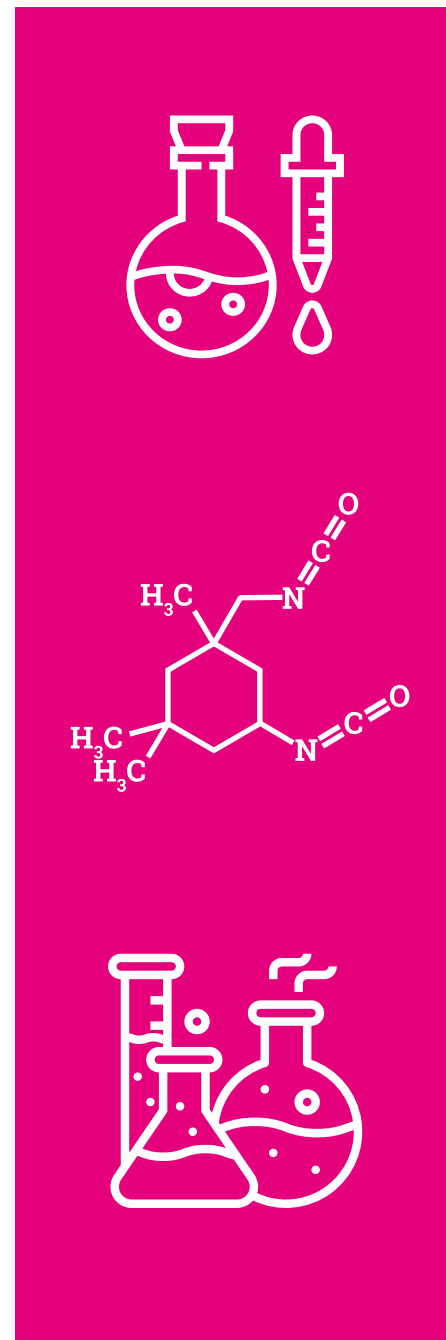
been supported and encouraged by the Industry.

What have we achieved

The restriction was published on 4 August 2020 and entered into force 20 days after. It will trigger the need to train millions of workers in Europe within three years, i.e. by 24 August 2023. Suppliers of products containing at least 0.1% of free monomers have legal responsibilities to ensure that training and courses are available to the users. We are committed to do our best to ensure this happens smoothly and efficiently. We have already developed, altogether, a set of slides to cover the different applications.

What are the remaining steps

The training material still needs to be finalised. However, the most important next step will be to find the best way to make it available on the market with the possibility to monitor the success of the training. The effective implementation will depend on the requirements that each Member State will still impose. The actual implementation is still unclear and further clarification will be needed. A couple of countries already have a mandatory scheme in place (Denmark, Sweden) where current practices will probably not significantly change. Other countries will have to decide who can provide the training, if e-learning is acceptable and to which extent classroom trainings are needed, as well as how certification and control will be carried out. Some of our national associations may be willing to play an active role in this mandatory training scheme. CEPE will continue to be involved in the coming years. 



« The actual implementation is still unclear and further clarification will be needed. »

Substance Risk Assessment Group (SubRAG)

REACH requires that risk assessment is conducted for all registered substances and for all supported applications. It is mainly the task of the registrants, but downstream users like our industry also have responsibilities to act whenever necessary. Only few members can carry out this task, hence SubRAG was created to provide some general support.

The issue

Under REACH the manufacturers and importers of chemical substances have the duty to register their substances and provide safe use information in their Safety Data Sheets (SDSs). When carrying out a risk assessment they provide the outcome as a Chemical Safety Report in their extended SDS (eSDS). However, the information provided does not always fit with the needs of our industry. It is also sometimes difficult to understand how they came to a certain conclusion. In addition, some manufacturers could decide for commercial niche substances to make very basic assumptions and pass safety levels based on unrealistic conditions. It is the responsibility of downstream users like ourselves to check whether safe use can be demonstrated down the supply chain and communicate safe use

information. Considering that there is very limited capacity to carry out risk assessment in our industry, SubRAG aims at helping comply by providing generic advice on safe use for a number of substances.

The EU regulatory and political environment

This activity is driven by REACH. This Regulation is in principle risk based, i.e. the hazard is compared to the exposure to characterise a risk. However, over the years, we have observed a trend towards a more precautionary approach to substitute hazardous substances only based on hazard, even if there is no risk in use.

REACH already contains some hazard based elements that trigger regulatory ac-

tivities. The most hazardous substances Carcinogen, Mutagen, Reprotoxicant Category 1, PBT, vPvB substances and substances of equivalent concern can become Substances of Very High Concern (SVHC) and listed in the Candidate List (at the time of writing, the candidate list contains 209 substances) for further regulatory measures. These substances are typically avoided in our industry. However it may happen that some are still used for some, difficult to substitute, applications such as industrial catalyst for polymers. It is important in this case to ensure that they are used safely.

The SubRAG selected substances do not generally fall under the above most hazardous substances but they represent key substances that may have difficulties to



pass safe use without adaptation of risk management measures.

What can we do and how

The setting up of this CEPE SubRAG group was done to support the CEPE Paint Formula Stewardship initiative. Indeed, addressing hazardous substances purely based on their classification was deemed to be too simple for our sector. Some substances may be adversely classified but still safe for use. Therefore, the group aims at assessing the risk of some substances of concern and identifying the risk management measures necessary to demonstrate safe use.

What have we achieved

Since its inception SubRAG has grown in maturity, from a situation where limited knowledge and resources were available to a motivated group aligning on processes and with growing knowledge. It is deemed

« We want to continue being able to carry out risk assessments to prove safe use of substances and to be able to use them in the future. »

an important group for the reasons explained above, i.e. that we want to continue being able to carry out risk assessments to prove safe use of substances and to be able to use them in the future. The group is now able to run a first Tier assessment for industrial and professional uses based on the CEPE SWEDs developed in the past by another CEPE group, ESCG, and fine tune the most appropriate risk management measures. It started to also work on Con-Expo for consumer applications, as this exposure software is the most established one for that category of the population.

Here is an extract of the outcome for one substance available to our membership (see table below):

What are the remaining steps


This group is expected to have a long-term future owing to the high number of substances and the different risk assessment methodologies available. The next immediate steps will be to continue the publication of the outcome for the next substances and work on refinements of assessments using additional models. 

Table 1: Evaluation done with ECETOC RA v3.1 February 2020

Name	Xylene (max 10% ethylbenzene)	
CAS	1330-20-7	A Respiratory protection with 90% efficiency
Molecular Weight	106,16	B Respiratory protection with 95% efficiency
Vapour pressure, Pa	821	C Enhanced general ventilation
Inhalative DNEL*, mg/m3	221	D LEV and general good ventilation
Dermal DNEL*, mg/kg bw/d	212	E Gloves APF 5
Concentration range	0-100%	F Gloves APF 10

SWED		< 1%			1 - 5%			5 - 25%			> 25%		
Scenario name	PROC	< 1h	1 - 4h	> 4h	< 1h	1 - 4h	> 4h	< 1h	1 - 4h	> 4h	< 1h	1 - 4h	> 4h

SWED		< 1%
Scenario name	PROC	< 1h
CEPE_SWED_PW_03a_v1, prof paint spray indoor Lev1 prep&cleaning	PROC 5	2,83E-02
CEPE_SWED_PW_03a_v1, prof paint spray indoor Lev1 handling&waste	PROC 8a	2,83E-02
CEPE_SWED_PW_03a_v1, prof paint spray indoor Lev1 application	PROC 11	1,42E-01
CEPE_SWED_PW_03b_v1, prof paint spray indoor Lev2 prep&cleaning	PROC 5	2,83E-02
CEPE_SWED_PW_03b_v1, prof paint spray indoor Lev2 handling&waste	PROC 8a	2,83E-02
CEPE_SWED_PW_03b_v1, prof paint spray indoor Lev2 application	PROC 11	1,60E-02

Microplastics

A few years ago some literature studies reported the presence of microplastics in the marine sediment (starting with the Baltic and the North Seas) and this escalated to the political level, forcing the European Commission to take action.

The issue

Microplastics must be differentiated from the problem of the 'plastic soups'. However, the presence of plastics in the sea is nowadays perceived as a problem severe enough to push for regulatory action. These microplastics come from different anthropogenic origins. The first source comes from the wear and tear of tyres. By driving a car one generates persistent microplastics that ultimately end up in marine sediments of our neighboring seas. However, this is not the only source of course, for instance the washing of textiles also contributes to this. There are insufficient systems in place to collect these residues, as well as insufficient sediment basins and sewage treatment plants.

The issue is that the European Commission requested ECHA to propose a restriction on the placing on the market of 'primary microplastics' and this also affects our sector for waterborne paints based on polymer dispersions. Through its definition 'everything that is not liquid or gas is solid' ECHA considers dispersions to be included while emul-

sions are considered liquid in liquid and thus are excluded.

The EU regulatory and political environment

This is a REACH dossier, although doubts have been raised about non-hazardous inert polymers being tackled by this Regulation. ECHA has proposed to take this issue under the REACH restriction route. Due to the difficulty of regulating the wear and tear of articles, this restriction focuses on the primary microplastics, those that can intentionally or under reasonable conditions of use be released to the environment, such as the microbeads in cosmetics, the encapsulation of fertilisers or the infill material used in synthetic turf (e.g. football fields).

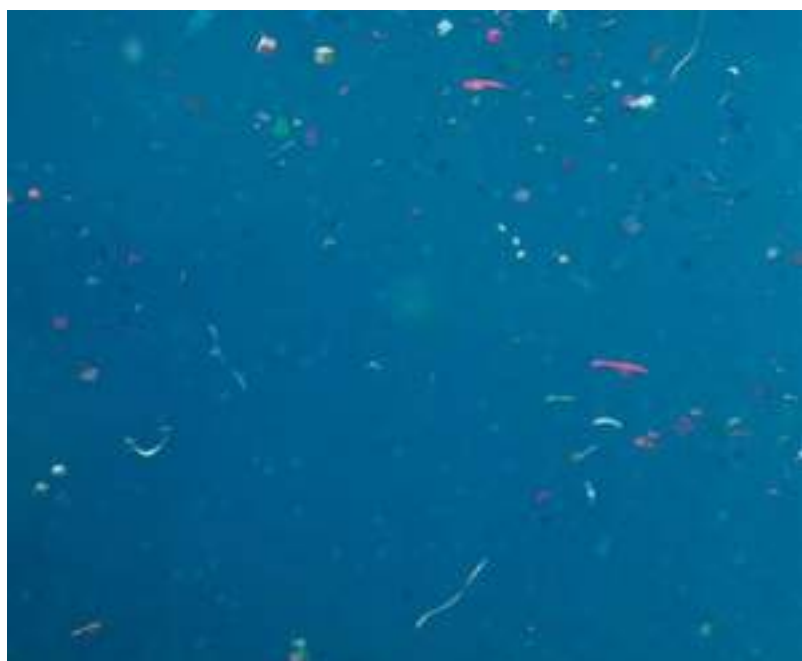
The precautionary principle has been used. Indeed, no harm has yet been demonstrated due to the presence of these inert particles in the environment but the concern is that they are persistent, which means that they will build up, possibly affecting future generations.

Despite the fact that our industry is only a minor releaser of primary microplastics, it has not been entirely possible, up to now, to get our sector entirely out of the scope of the restriction, adding some additional administrative burden of information and reporting. In general, the ECHA approach to such problems is to restrict all uses, then derogate some uses, instead of focusing only on the most relevant releases.

What can we do and how

CEPE is active on the issue since 2016. We immediately set up dedicated expert groups, and at a later stage an advocacy one, in order to provide data to the regulators and try to avoid, and if not possible minimise, the impact for our sector.

The first sets of information CEPE provided to the consultants working on behalf of the European Commission were figures and other information concerning our industry. The only direct relevant – although minor - environmental contamination coming out of our industry is when consumers wash under the



« Products like coatings have been derogated from the restriction from placing on the market. »

tap the remaining water-based paint present on the brush or roller. CEPE has issued a good practice guide to prevent this behaviour in the future.

While CEPE was in contact with the European Commission, National Associations were liaising with their ministries. CEPE also joined other industry associations to align views and participated in the Committee for Risk Assessment (RAC) and the Socio-Economic Analysis Committee (SEAC) discussions. To date the steps have been:

- November 2017 - ECHA received request from the European Commission to prepare a restriction proposal
- March to May 2018 - a 'call for evidence' was held + workshop
- January 2019 - a proposal for restriction followed by an update in March
- March to September 2019 - a public consultation was held
- February 2020 (draft) Background Document (= digestion of public consultation results)
- June 3 - adoption of the 8th opinion RAC

- June 9 - adoption of SEAC opinion.

What have we achieved

Products like coatings that are film forming have been derogated from the restriction from placing on the market.

What are the remaining steps

The main remaining issue is linked to the burden of the reporting obligation as follows:

- For industrial customers our members would have to inform on the presence of microplastics, the amount and the generic type present in their products. These customers would then have to report every year on the amount and type used and the estimated discharge to the environment;
- For professional and amateur users, our members would have also annually to report the same directly.


The aim of the regulator is to understand if these contaminations will require additional regulatory actions in the future. We are of the opinion that it makes no sense: our figures will show minimal release anyway and the same estimated figure for release will be sent

every year as it will be based on the same release factor. If the business for water-based products increases, the figures will increase accordingly and despite being minor, these figures could send a negative impression to the outside world i.e. that our industry increased the environmental contamination of microplastics.

Specifically, we will try to get:

1. The removal of the need to declare the polymer identity (due to confidentiality);
2. The removal of the reporting obligation for industrial use as the sites are already functioning under environmental permits and have removal techniques already in place for wastewater;
3. A simplified reporting of the other user categories.

At the time of writing, a public consultation on the SEAC opinion just ended. CEPE provided additional figures to demonstrate that the burden coming from the information and reporting requirement is not proportionate. National Associations are still active on this dossier and the CEPE community was encouraged to participate and provide individual input as well.

If adoption occurs in 2021, then the reporting would enter into force in 2022 + 36 months. 





and every opportunity is taken by the regulator to get more insight.

What we can do and how

CEPE has been actively involved throughout all these years, in liaison with other industry associations, in order to limit the burden for our industry. Given that the Regulation 217/542 was still not workable, one of the first issues to solve was the postponement of the first deadline of notification for consumer products by 1 year, i.e. to 1 January 2021. Also, CEPE/DUCC have been successful in influencing many parts of the new text but further discussions were needed. This was especially true for tinted paints sold at point of sale (bespoke paints). Without a second amendment it would have created a huge and

disproportionate burden with the need to notify millions of different coloured paints before the base paint was tinted at point of sale.

The European Commission hired in 2018 a consultant to conduct a study on the workability issues. CEPE was a major contributor, and the final report was delivered in summer 2019. The problems faced by our industry were acknowledged but limited time was available to agree on the solutions, such as relaxing the rules for the generic identifier 'colouring agents', or not notifying final mixtures but instead communicating the UFIs for the base paint and tinters. The European Commission had set up a sub-group to discuss the proposed solutions and possible legal amendments, starting in September 2019. National Associations started to be involved in 2019 as well to relay our messages to their authorities, through a CEPE Advocacy TF. CEPE got the retailer association (EDRA) involved and gave a joint presentation early 2020.

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 still part of their IT User Group and participated in the 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 took place later on, with the last one expected around October/November to integrate the second workability amendment. The Portal will offer system-to-system integration, enabling companies to transmit data automatically from their in-house IT systems – likely to be very important for CEPE members, as manual use of the Portal is not realistic for most companies.

Member States gradually connect to the new tool and are ready to receive submissions through the ECHA Portal. Members should note that submissions are only considered valid once received and accepted by the Member States 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.

CEPE is also contributing to the development of the ECHA Guidance on this new notification requirement since March 2019.

What have we achieved

As outlined above, CEPE has been an important contributor to limit the burden of this new system as much as possible and make it workable. Following this, significant improvements were adopted by the legislator. The worst has been avoided.

What are the remaining steps

The worst has been avoided but naturally it is a compromise and the new requirements represent a new burden. Some additional adaptations are desired, and most importantly more time is needed to comply. The last discussion that the European Commission organised was a Web conference in May 2020 (due to Covid). The European Commission was no longer open to amendments as their drafts had gone through their inter-service consultation and that they had no mandate to discuss an additional postponement. Following this, we wrote to the highest level of Commission officials to highlight our remaining concerns, especially the impossibility to comply by 1 January 2021 for bespoke paints as the adaptation of over one hundred thousand of tinting machines throughout Europe requires more time. Several other industry associations supported a postponement of at least 6 months due to the very short time that will be available between the publication and the deadline (8 weeks), the still current development of the IT tools, ECHA guidance and the Covid situation. At the time of writing we noted that many Member States also voiced their concern to the European Commission and supported a delay. Indeed, some of their emergency response centers are still involved in dealing with Covid. We had expected that this would trigger the European Commission to have another internal discussion at high level to allow some postponement. However, we noted on 31 August that the European Commission finalised the legal text without providing any extension. This has been another major dossier of CEPE during the past years and is reaching an end. As for other dossiers it illustrates how important an early and positive engagement with the regulator is.

Classification, labelling and packaging (CLP)

The issue

Apart from the poison center development under CLP (see the article on page 16), in this case the issue is not about new legislative developments but about compliance, implementation and enforcement. Each year new issues need our attention and, where necessary, action.

The EU political environment

CLP is a well-established EU hazard based regulation which is also linked to the UN Global Harmonized System (GHS). There is currently no political pressure to change it, hence most activities lay around proper compliance, implementation and enforcement. There are, however, from time to time new additions such as new data requirements or new adaptations such as the newly created EUH 211 and EUH 212 sentences following the case of titanium dioxide (see article on page 9).

What can we do and how

CEPE, together with other industry associations, typically collaborate to help companies comply with CLP.

Occasionally we also intervene during public consultations before a substance classification is discussed at the ECHA RAC. However, we usually do not bring comments based strictly on hazard but general comments on the importance of a specific substance to attract the attention of the regulator.

What have we achieved

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 has now produced together with SMEUnited a "Guidance at a glance":

- the use of Child Resistant Fastenings,
- the use of Tactile Warnings of Danger and
- the online sale of chemicals.

They are being translated into other EU languages.

Guidance

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.

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 European Commission's report on the Fitness Check on European chemicals legislation excluding REACH (published June 2019), with a recommendation to making use of digital technologies such as QR codes to improve matters. CEPE is already involved in work in this area in GHS (see below) and will pursue any opportunities to contribute to activities on EU level.

CEPE provided the CEPE guidance note "Labelling of Treated Articles - revision 3" to the HelpNet Authorities to ask for comments. It is a 12 pages guidance that help our members to comply with both the CLP and the BPR requirements. Only two Member States' Authorities looked at it but confirmed that our guidance is correct from the CLP standpoint. Hence we consider that our Guidance is of good quality and can be referred to in case of enforcement issue.

Safety Data Sheets (SDSs)

Through DUCC, CEPE has given input to a new revision of Annex II to REACH, now published. The European 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. The ECHA

Guidance is being revised and a Partner Expert Group discussion is ongoing. There are points of concern with regard to the information needed for endocrine disruptors, the methodology for stating concentration ranges in Section 3 and the need to indicate the names of distributors in Section 1.

Both CEPE and DUCC joined a Forum-ASO joint working group on improving the quality of SDS. 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 article on page 6).



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The CEPE TC LSDB group 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 article on page 6) and perhaps in future for other topics such as microplastics.


Late 2020, DUCC will present in a Forum on Industry concerns on quality of SDSs.

New ATPs

New adaptation to technical progress have been adopted:

- 14th ATP published including titanium dioxide: as stated in the separate article on this substance a lot of internal and external discussions took place with regard to proper guidance on this very peculiar new case of solid dust.
- 15th ATP adopted by the European Commission and scheduled for publication in August 2020, includes OIT, DCOIT, MBIT, Zinc Pyrithion (key biocides preservatives) as well as MEKO and 2-butoxyethanol.
- 16th ATP was put on hold due to covid-19 implications - now put back under adoption procedure.
- 17th ATP under discussion, contains MIBK, boron compounds, DBNPA, 2-phenoxyethanol, cypermethrin and carbendazim. It is unclear if publication in November as previously communicated by the European Commission is still feasible.

What are the remaining steps

The activities taking place under this heading are continuous and we do not foresee an end any time soon. CEPE remains committed to continue serving its membership on activities related to CLP compliance and advocacy. 

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Biocides

A very important dossier for CEPE. Biocide preservative are absolutely essential to preserve both water based in the can (the in-can preservatives) and outdoor coatings after application (the dry-film preservatives).



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The issue

With the implementation of the EU Regulation N° 528/2012 on biocidal products (BPR), we are increasingly concerned about the future availability of effective preservatives. Biocides are products defined as additives for paints used in small amounts; our industry does not manufacture them but uses them.

The EU regulatory and political environment

Biocides are means of controlling 'pests' or 'bugs', i.e. microorganisms and macro-organisms everywhere other than on plants (pesticides are designed for plants and are regulated separately). Biocides therefore encompasses products like household insecticides, rodenticides, anti-fouling paints, human hygiene disinfectants, swimming pool disinfectants, metal working fluids or preservatives.

Before 1998 biocides were very poorly regulated in Europe, only some of the products were in a few Member States. The preservative

were almost non-regulated (except wood preservatives). The Biocide Product Directive was adopted that year, replaced by the Biocide Product Regulation in 2012 (because the first did not work properly). By May 2000 industry was requested to identify all the existing active substances and their uses (called Product Types) present on the market (around 1000), and by 2003 the industry was asked to submit information to support the most important substances (around 350). From 2004 to 2008, industry was then asked to submit full data packages for these substances. The in-can preservative dossiers were submitted in 2007 and the dry-film preservative dossiers in 2008. The review of existing substance then started. Member States were allocated substances to review.

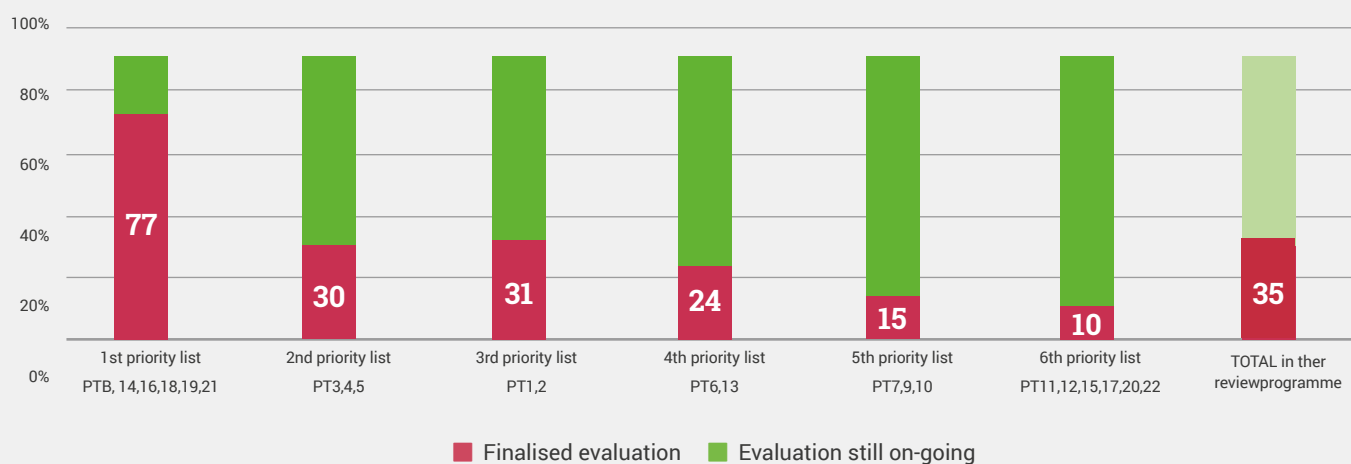
The review was first supposed to end in 2010, then in 2014, and with the BPR an extension to 2025 was granted by the European Parliament. Despite this extensive duration, after 16 years of review, and 4.5 years before the deadline, only one-third of

the review programme has been finalised (24% of in-can preservatives and 15% of dry-film preservatives) as the diagramme on the next page shows (taken from the European Commission document 'Progress of the review Programme of active substances' from the 88th Competent Authorities' meeting of May 2020).

With the current path, the review programme will fail. Why? Because of the very heavy and costly requirements, the extremely complex ever changing guidelines and their conservatism based on the precautionary principle, the addition of new criteria such as endocrine disruption, the need to get through harmonised classification, the lack of resources and/or competence in national ministries, the necessary renewal of actives and products, the need to discuss issues with mutual recognition etc.

The official aim, as described in the text is to improve the functioning of the internal market while ensuring a high level of safety for human health and the environment. The less

› Overall progress on the review programme of existing AS per priority list



official objective is to eliminate or reduce as much as possible the use of biocides.

The BPR has been left in unbalanced regulatory hands and we have to face this difficult reality since more than 20 years. It has been more than challenging to find support elsewhere, be it in DG GROW of the European Commission or in national ministries for Economic Affairs. We are currently operating in a highly political environment.

What can we do and how

CEPE has been deeply engaged for many years with the biocide regulators (at EU and national levels) to explain the essential need of preservatives and the possible upcoming crisis due to the unavailability of efficient products. We have developed advocacy documents used by our national associations, as well as during official Biocide Competent Authority meetings in Brussels. We have continuously been in contact with other downstream user associations, mainly the detergent industry, as well as with the biocide suppliers, to jointly address our common problem.

What have we achieved


We have achieved a significant momentum

since the end of 2019. It took us years to have the regulators accept the fact that there is indeed an issue that needs to be solved. This has now been officially recognised by the European Commission and the Member States.

What are the remaining steps

A solution has now to be found. Following this recognition of the essential need of preservatives, in February 2020 at the Biocide CA level the regulators were still hesitant to develop a solution. One of the key family of preservative substances (the isothiazolinones) is made of skin sensitising substances. In 2016 the regulator approved the use of one of them for in-can preservation (CMIT/MIT) but with a disturbing restriction for use in consumer products. It stated that it cannot be used in consumer products (like paint) above a concentration limit of 15ppm for skin sensitisation – thereby forbidding the sale of treated articles classified as skin sensitiser. Therefore, they made a precedent that would impact the other substances, which are not efficient under their newly adopted classification limit (a default 15ppm despite their different potency), hence resulting in a potential ban for this essential chemistry in consumer paints.

There was an agreement that we should first have a scientific discussion which occurred in March 2020. Toxicologists from the paint and the detergent industry were involved. Again, the outcome was disappointing. In a nutshell, the proposal for a quantitative risk assessment as addition to qualitative risk assessment, despite being based on ECHA guidelines, seems to be too difficult to tackle by Member States' scientist and a 'too hot potato' given its impact on REACH as well, that the ECHA proposal was to send it back to the policy makers, i.e. the Biocide CA meeting. We wrote to ECHA and to the European Commission stating the importance for this discussion to take place. Also, it should be postponed to the product authorisation stage – rather than the active substance stage – in order to properly take into account the reality of the formulations, applications and uses, which all affect risk characterisation.

CEPE, together with the help of National Association and a network of other industry associations, will continue the discussions in the coming months and years. There is a light at the end of the tunnel, even though this tunnel is a 'Saint-Gothard' type which took 17 years to be build. 

Transport

CEPE's Technical Committee Transport (TCT) monitors proposals to the various international transport regulations to ensure that there are no controls that would cause problems for CEPE/EuPIA members.



The Committee also makes its own proposals to improve the situation for members. This includes working with the various international bodies to avoid undue costs, delays or administrative burdens. The regulations comprise the overarching UN Model Regulations on the Transport of Dangerous Goods (MRTDG), the International Maritime Dangerous Goods (IMDG) Code for sea, International Civil Aviation Organization (ICAO) Technical Instructions for air and, in Europe and beyond, International Carriage of Dangerous Goods by Road (ADR), International Carriage of Dangerous Goods by Rail (RID) and ADN for road, rail and inland waterways respectively. Over half of all paints, coatings and inks transported are classified as dangerous goods and so fall within the scope of these rules. CEPE/EuPIA work is carried out in conjunction with the

World Coatings Council (WCC), particularly the American Coatings Association, to ensure changes are globally acceptable.

The technical name 'PAINT' has successfully been added


The CEPE/WCC proposal to use a Proper Shipping Name as the Technical Name for environmentally hazardous goods (e.g. 'PAINT' for UN 3077 or UN 3082) has been successfully introduced to the UN Model Regulations and the TCT oversaw its implementation into the various modal regulations for the 2021 editions. This was a significant success after several years of discussions and will make it easier for shippers to understand the nature of the dangerous goods and will aid members' documentation systems.

Another example of success for IMO

The Committee also helped the International Maritime Organisation implement the provision clarifying in documentation that flashpoint information is only required for flammable liquids and not aerosols and solids, avoiding delays when shipping goods. This will be incorporated into Amendment 40-20 of the IMDG Code.

CEPE TCT is a credible body towards Authorities

The TCT continued its regular dialogue with national transport authorities, and in September 2019 met with the Belgian authorities from the Federal Public Service – Mobility and Transport. These meetings show that the TCT is a credible body that understands the regulations, building confidence in its activities and aiding mutual understanding.

The CEPE TCT also worked on transport classification posters and guidance on environmentally hazardous materials, which had to be updated and issued. 

« Over half of all paints, coatings and inks transported are classified as dangerous goods. »

Drinking Water Contact

A revised version of the Drinking Water Directive is nearing completion. The new Directive will impose new requirements on materials in contact with drinking water, including organic substances.



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The Issue

A recast of the Drinking Water Directive (the previous one dated from 1998 – 98/83/EC) is about to be finalised. Some CEPE members manufacture coatings inside water pipes or on other devices in contact with drinking water (epoxy based mainly but also using other chemistries) to prevent rusting of the steel and to ensure water quality.

The new Directive will set new requirements for materials in contact with drinking water including for organics. It is an important topic to follow and to contribute to in order to have a workable system that members can comply with. The publication of the new Directive will be followed by the development of new standards and requirements.

The EU regulatory and political environment

The overarching objective of the recast proposal is to ensure a high level of protection of the environment and of human health from the adverse effects of contaminated drinking water. The revision is also a result of the first-ever successful European citizens'

initiative 'Right2Water'. The proposal aims to update water quality standards, to introduce a risk-based approach to monitoring of water, to improve the information on water quality and water services provided to consumers and to improve access to water. In addition, the proposal also addresses the issue of materials in contact with drinking water.

Unlike the current regulatory trend to replace directives by regulations, this recast will still leave the flexibility of implementation with Member States.

Currently our Industry complies with existing national requirements that exist in a few Member States. Years ago the most active Member States got together (the "4MS initiative" – FR, DE, NL and UK, followed by DK later) to discuss possibilities of harmonisation of testing standards, assessment and a joint positive list of substances allowed to be used in materials in contact with drinking water. This work, already done, will serve as basis for the implementation of the new Directive. Indeed, ECHA is tasked to develop a first positive list using what has already been done.


What can we do and how

CEPE first joined an Alliance of industry associations which was already addressing this new development. In addition, CEPE created a dedicated group made up of members placing on the market protective coatings and powder coatings. The members are already dealing with existing regulations and provide technical expertise. The group will aim at understanding how they could be affected by possible new, more stringent, technical measures and connect with the responsible authorities to convey its messages.

What have we achieved

The newly created CEPE group achieved common understanding of the issue at stake i.e. collection of existing schemes and agreed to undergo collective testing efforts using the same laboratory and testing methodology.

What are the remaining steps

The CEPE drinking water contact task force will obtain screening testing results in Q2 of 2020 which will allow to identify the possible gaps in knowledge and based on these results develop the next steps. 

EuPIA Annual Report 2020

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.



Martin Kanert
Executive Manager
EuPIA



Market Statistics 2019

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, 2019.

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

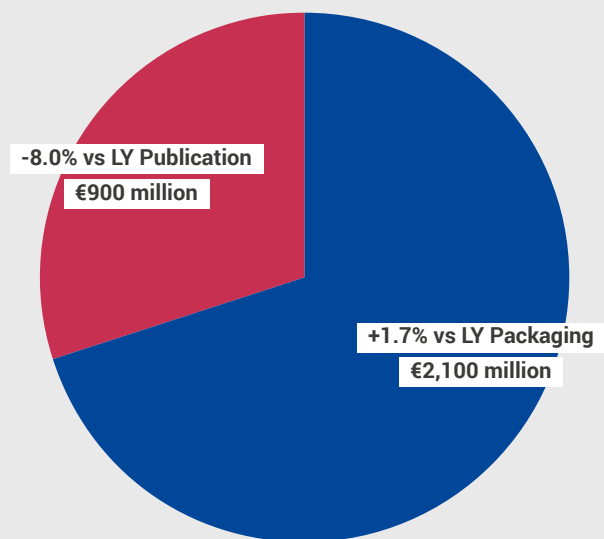
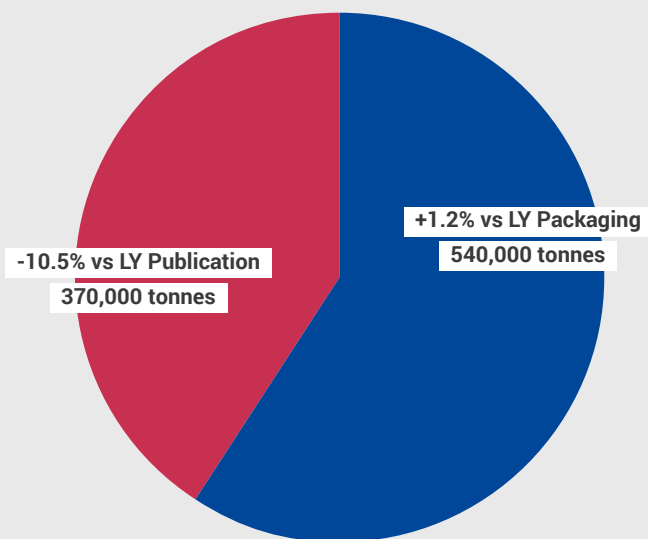
Key sectors shown

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).

Sales volume for 2019 in 1000 tonnes

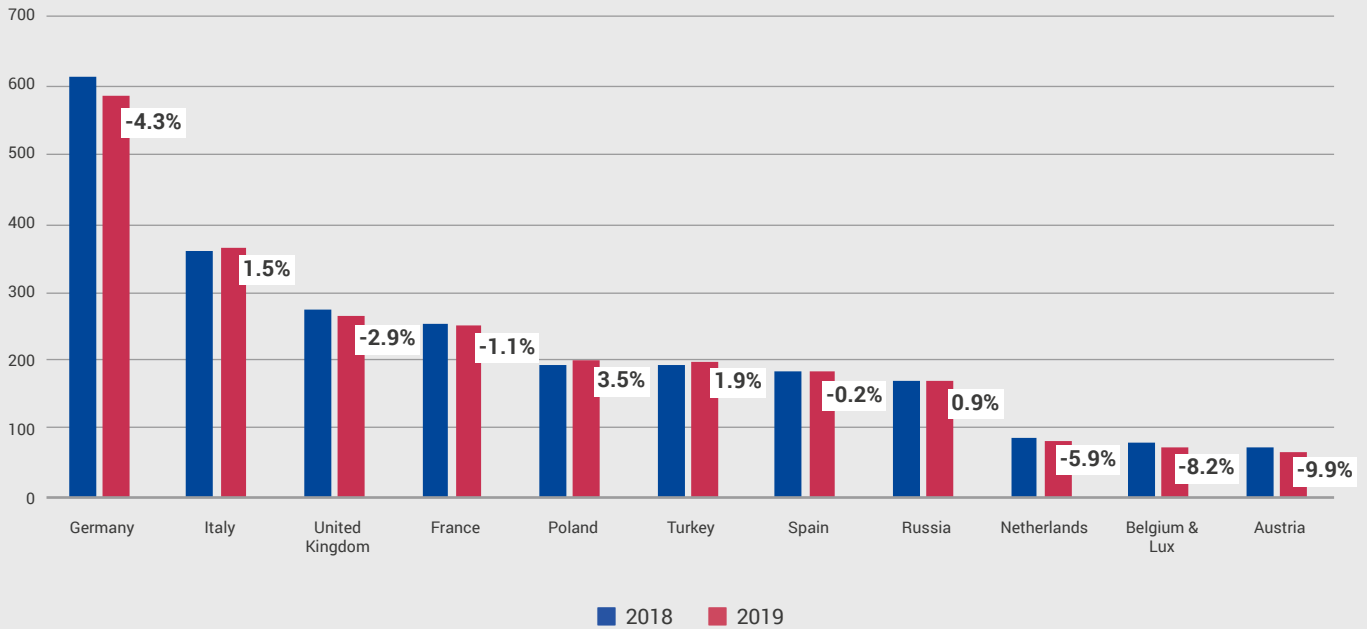
Sales value for 2019 in EUR millions



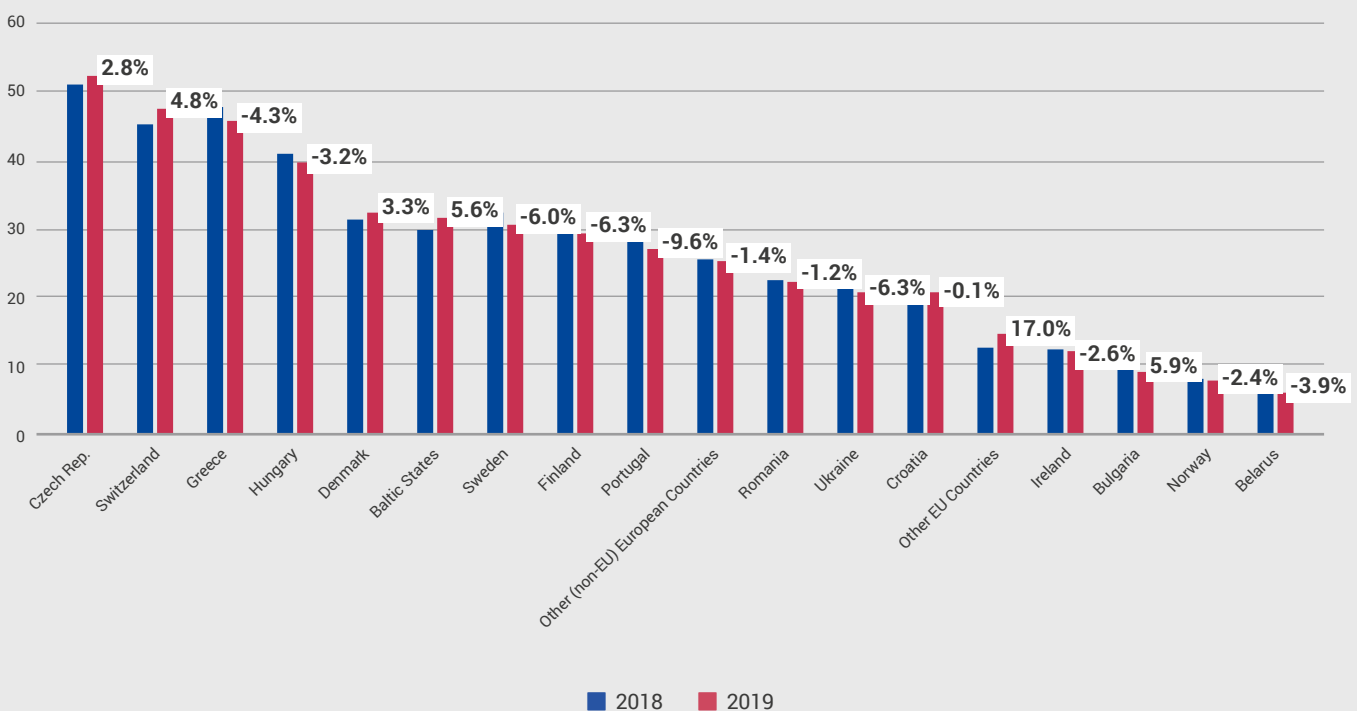
■ Packaging
■ Publication

■ Packaging
■ Publication

Sales Value by country 2018 to 2019 in EUR millions



Sales Value by country 2018 to 2019 in EUR millions



Impact of the Corona-virus pandemic

In the first quarter of 2020, the Covid-19 outbreak in Europe led to the biggest shock for the EU economies since the Second World War. In March, severe lockdowns were gradually implemented to avoid massive infections. Despite this depressing scenario, the EuPIA statistics for the first quarter 2020 were better than the previous quarters. Some product categories, such as liquid inks and overprint varnishes, have boosted sales not seen since 2017, especially in those market segments connected with packaging for food and healthcare products. For publication inks, unfortunately the downward trend which we observe for quite some time, persists.

Overall, we see that the printing inks market in Western countries continued the downward trend like previous quarters. However, some Eastern countries kept growing, even in the crisis situation.

However, from these preliminary observations, we cannot assess and foresee the future impact of this socio-economic crisis on the European printing ink industry. Still, it is too early to say that there will be changes in consumer behaviours due to social distancing policies or travel restrictions. At this stage, we can only look at the economic outlook for the European economy, which will depend on the evolution of the pandemic.

Printing ink companies are part of the essential infra-structure in this pandemic, and concentrate all their efforts on mastering the crisis triggered by the pandemic, maintain production, and serve the increased demand for inks for food packaging and healthcare products, which is essential for the supply of the population with these goods. In this situation, the ink industry has been facing bottlenecks in the supply of important raw materials for the manufacture of packaging inks; one example of this is the shortage in the supply with ethanol, the predominant solvent in solvent-based flexo inks which at times reached crisis levels.

EuPIA and the National Associations advocated for open EU borders to ensure that

supply chains are not disrupted, and called on political decision-makers to consider other sources of ethanol in order to cover the increased demand for ethanol as disinfectant, while safeguarding the supply of ethanol for the manufacture of printing inks for food and pharmaceutical packaging.

As another consequence of the pandemic, the EuPIA Annual Conference that was scheduled for March 2020, had to be postponed. It will now take place on 18th and 19th March 2021 in Budapest.

Social media: EuPIA now on LinkedIn

In order to further enhance the communication of EuPIA, under the auspices of EuPIA's Communication Group, EuPIA silently launched an EuPIA LinkedIn website at the beginning of 2020. While still gaining experience, the group is fundamentally satisfied with the development and is grateful for the likes and shares. The new channel delivers EuPIA's information in a user-friendly way on a social media platform for professionals, helps to reach a broader audience, and facilitates exchange. EuPIA is working on different formats, but generally LinkedIn will be a place for news, updated documents, and interviews. The EuPIA presence on LinkedIn is an add-on, all other existing communication tools will remain.

Printing Inks and Varnishes for Food Contact Materials

Although specific legal provisions for printed food contact materials (FCM) are missing on a European level, printed FCM fall under the scope of the European Framework Regulation (EC) 1935/2004 on materials and articles intended to come into contact with food. The provisions concerning the protection of the consumers set out in Article 3 of this regulation are rather general; they need to be detailed out and specified to be applicable to printed FCM in practice. Therefore, over the past 10 years EuPIA has created a set of rules and guidance documents with which its member companies and their customers can work and manufacture printed FCM in accordance with the requirements of the framework regulation. These rules and concepts are constantly adapted and improved.

In 2020, EuPIA published the new "EuPIA Guideline on Printing Inks applied to Food Contact Materials", which gives a systematic overview of all guidance documents. Furthermore the "EuPIA Guidance for Risk Assessment of Non-Intentionally Added Substances (NIAS) and Non-Evaluated or Non-Listed Substances (NLS) in printing inks for food contact" was updated to the current scientific understanding. The EuPIA Analytical Experts Working Group



is at present conducting a research project to define improved testing methods for the evaluation of the migration of components of packaging inks, by comparing accelerated migration testing with real food migration. Based on the results of a pre-study, which was finalized in 2019, the group has launched the main part of the study, which will run until the beginning of 2021. Moreover, the Energy Curing Working Group has reworked the "EuPIA Suitability List of Photoinitiators and Photosynergists for Food Contact Materials"

EU Commission is evaluating the legal framework

The EU Commission is not idle with regard to food contact materials either. At the end

of 2016, the Commission had announced that it intended to issue a harmonised regulation for printed FCM, but has later postponed work on this regulation in order to first subject the framework regulation itself to revision. As the basic legislation is over 40 years old (originally Directive 76/893/EEC, now Regulation 1935/2004), has never been systematically evaluated and does not take “new” developments such as REACH

NEXT Event



The next Annual Conference
will be held on

18-19 March 2021
in Budapest (Hungary).



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Germany again working on “Printing Ink Ordinance”

Also on the national level, food contact materials remain in the focus of attention. In 2020, the German Federal Ministry of Food and Agriculture (BMEL) presented a new draft of the 21st ordinance amending the German Consumer Goods Ordinance; the so-called “Printing Ink Ordinance” (GIO), arguing that the Commission has failed to keep its promise to provide a European legislative measure by 2018. The wording of the draft is largely identical to the draft notified in 2016 and the positive list is still incomplete, which means that the current draft is not workable in practice. Also, the general objections against a national measure, which ignores the interlinked internal market are still valid. The German paint and printing ink association, VdL, and the whole German packaging value chain have strongly criticized that the ministry is taking up the legislative proposal in the middle of the Corona crisis, without any need of urgency, and presents a new draft which is not workable and completely ignores the principles of the European single market. Industry is urging the German ministry to give the European legislative process the time it needs. The European value chain, organized in the PIJITF, also sent a letter to high-level German officials, highlighting that amid the current crisis, which puts European cohesion and the Single Market under significant pressure, it is more important than ever to avoid any unnecessary national measures. Especially in view of the German European Council Presidency, which started on 1st July 2020, this would send a wrong signal. The PIJITF is calling on the German Government to support the European Commission’s work on a harmonised European measure on printed food contact materials, instead of continuing with national legislation.

into account, the priority of this project over other specific measures is understandable with regard to a consistent legal framework on a European level. The Commission has issued a study evaluating the framework in the years 2018 - 2019, of which the final report was recently published. However, before drawing the conclusions, the Commission decided to perform an Inception Impact Assessment, which involves a consultation on policy options and which will start in 2020. Naturally, EuPIA will take part and provide its expertise.

As industry is in favour of a practicable European legislation on printed food contact materials, EuPIA and several other members

of the Packaging Ink Joint Industry Task Force (PIJITF) urged the Commission to integrate the EU harmonised approach towards food contact materials in the Farm to Fork Strategy and ensure its timely development. Indeed, in the Farm to Fork Strategy, which forms part of the Green Deal, the Commission has committed itself to present a proposal for a revision of the EU legislation on Food Contact Materials to improve food safety, ensure citizens’ health and reduce the environmental footprint of the sector in 2022. Also, industry will keep on promoting the regulatory concepts, which were proposed together with all partners in the European value chain, as organized in the PIJITF.

Switzerland updated its positive list for printing inks applied to food contact materials

Section 12 of the Swiss Consumer Goods Ordinance sets out provisions specific to food contact material inks. Substances which only may be used in the manufacture of printing inks in scope of the Ordinance are listed in Annex 10. Switzerland issued a revised version of this annex, which came into force on 1st December 2019, and becomes applicable after a transition period of one year. Industry was insufficiently consulted in the revision of the annex. Therefore, the Swiss Coatings Federation VSLF has been forcefully fighting for the industry involving their political network in the Swiss parliament. The advocacy efforts are ongoing. VSLF, EUPIA and industry representatives are in close contact and continue to work on this collaborative effort in favour of the printing ink industry.

Printing Inks and the “Green Deal”

EuPIA established two task forces, the Paper Recycling Task Force and the Plastics Recycling Task Force which monitor and assess the impact of the transformation to a Circular Economy on the ink industry. As the current regulatory developments in the European Union concerning the Circular Economy will mainly take place under the umbrella of the Green Deal - the programmatic centerpiece of the von der Leyen Commission - the task forces are also monitoring several additional aspects of the Green Deal. Although its overall aim is for Europe to become the first region to achieve climate neutrality by 2050, the Green Deal leads way beyond climate policy, as it comprises an ambitious set of measures, which shall transform the European economy and society to put it on a more sustainable path. Hence, the ink industry's business as a whole will be affected. The Circular Economy Action plan is one major part of the Green Deal and presents a set of interrelated initiatives with the aim to establish a strong and coherent product policy framework that shall make sustainable products, services and business models the norm and transform consumption patterns so that no waste is produced in the first place. It also announces a sustainable products policy framework to support the



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circular design of all products. Although the concrete legislative measures still have to be developed, it is already clear at this stage that the paper and plastics recycling chain will be highly affected. An increased pressure for solutions at the design stage is foreseeable. The ink industry will play its role in the transformation process and propose and support solutions to the main challenges ahead. However, it also has to defend its interests against measures, which tend to put the focus on a “design for recycling” instead of a “design for sustainability” or which ban chemicals on the basis of their hazard classification without taking the risk and the actual effect on the circularity of the product into account.

In the publication business, the use of mineral oils in inks was an issue on the agenda of several member states. Publicly funded research projects on mineral oil-free coldset inks are currently running in Germany and France. In this context industry was often confronted with the allegation that mineral oil-free offset inks are readily available in other parts of the world. In order to facilitate a fact-based discussion on this issue, the Paper Recycling Task Force has devised the “*Statement on the use of mineral oils in offset inks.*”

The European Paper Recycling Council (EPRC), formerly European Recovered Paper Council (ERPC), is an industry initiative, which monitors the progress towards meeting the paper recycling targets. EuPIA is a supporter of the EPRC and is actively involved in many of its activities. The paper recycling rate in Europe reached 72% in 2019.

The Paper Recycling Task Force was also deeply involved in the revision process of EU Ecolabel on Printed Matter. Under the organization of the Joint Research Centre of the European Commission, potential new criteria were discussed in several stakeholder meetings with industry and member states representatives, where also EuPIA representatives were involved. The process is almost finished, the new criteria will be published in 2020.

Already before the Green Deal, plastic packaging was in the focus of many environmental discussions and regulatory developments, such as the EU Plastics Strategy and the directive on single use plastics products (SUP Directive). Within the Green Deal the Commission has announced to follow up on the Plastics Strategy, to develop a regulatory framework for biodegradable and bio-based plastics, and to implement the measures on single use plastics. The Plastics Recycling Task Force is monitoring the growing number of regulatory developments and initiative of all different stakeholders and is actively positioning the ink industry in this quickly changing environment. The group has recently published the EuPIA Customer Information note on “*The acceptability of using carbon black pigment in inks for plastic packaging which is destined to be recycled*” and the “*EuPIA Statement on Printing Inks based on Bio-renewable Raw Materials and Biodegradable or Compostable Inks*”. Furthermore, the task force is liaising with the different stakeholders along the plastics recycling chain. Concerning the SUP directive, the TF has been monitoring the legislative process as well as the development of the relevant guidance documents and the national implementation.

Technical and Operational Issues

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

Hazardous substances and product stewardship

The EuPIA Exclusion Policy for Printing Inks and Related Products has again been a key focus this year. The Policy is about enhancing the safety of inks by excluding hazardous substances which have a serious adverse effect on human health. The Policy states that EuPIA members by default do not use raw materials in their inks, which are classified as toxic or CMR (to be exact: acutely toxic cat. 1, 2 or 3; carcinogenic, mutagenic or toxic to reproduction (CMR) cat. 1A or 1B; or specific target organ toxicity (STOT) cat. 1). Originally designed to protect employees in the ink industry, the policy also protects printers and the end users of printed materials. As EuPIA members cover more than 90% of ink sales in Europe, the policy significantly contributes to the safety of inks used across Europe. A list of EuPIA members is available on the EuPIA website.

The EuPIA Communication Group published a document highlighting the value and benefits of the Exclusion Policy, also available on the EuPIA website in the section "Our Commitment".

A EuPIA Exclusion Policy Review Task Force has been established to work on streamlining and clarifying the procedures according to which members should operate when implementing the Policy.

The recent adaption of the Toy Safety Directive 2009/48/EC has an impact on the important application of printing inks on toys. Especially the reduction of the migration limit for aluminum will be challenging for the use of several printing inks containing metallic pigments. The ETC follows this topic closely and adapted its information note on printing inks and related products for the manufacture of toys to reflect the latest developments.

Since 2014 EuPIA has participated in an industry task force developing guidance on safety assessment for cosmetic packaging. After a large-scale trial during which the requirements of the draft were evaluated, the guideline was finally published by Cosmetics Europe.

ETC also monitors the technical and regulatory status of various 'substances of interest' such as titanium dioxide, biocides or microplastics and provides input as far as these relate to the use in printing inks. Regarding microplastics, the ETC published the new information note "*Microplastics in printing inks and printed products*" which describes the impacts of the REACH Registration Proposal for intentionally added microplastics for the

sector. Other related topics, such as the notification to poison centres or sector-specific Worker Exposure Descriptions (SWEDs) and Safe Use of Mixtures Information (SUMIs) are discussed in detail in the LSDS Group.

In 2017 the ETC published communication leaflets on the environmental footprint of printing inks, based on a Life Cycle Analysis (LCA) of a generic reference ink composed of the weighted average of the actual production mix of printing inks in Europe. After a recent update of the LCA database, the leaflets were reviewed and updated. The leaflet "Eco Footprint of a generic reference – version 2020" can be found on the EuPIA website.


ETC continues its cooperation with the graphic industry association Intergraf to address issues of common interest such as environmental topics.

Safe workplaces for ink manufacturers and their customers

The OSRA working group, which deals with all safety related topics, continues its mission to support member companies and customers in operating at the highest levels of safety. For this, the group publishes regularly new Safety Alerts and Safety Flashes dealing for example with Powered-Pallet-Trucks or three roll mills. To further highlight the importance of safe use of three roll mills, the working group also published a new guideline dedicated to this topic.

The European Solvents Industry Group ESIG maintains a campaign about the safe handling of solvents at work with several guidance documents, posters, and videos. OSRA published an information note to recommend the campaign to the members.

To support the CEPE efforts on key substances of interest, such as Di-isocyanates, the group continues to give its expert input from the occupational health and safety viewpoint.

Again, safety performance indicators were collected from EuPIA members for 2019, which means that the corresponding figures are now available for the years 2016 to 2019. 





Artists' Colours

The challenges for producers of artists' colours are quite similar to those of manufacturers of paints and coatings, as in the case of titanium dioxide or biocides. Other topics for the European Artists' Colours Association (EuACA) is the Toy Safety Directive.

The issue

Overall, EuACA members have very similar concerns as those of other CEPE members. Therefore, the work carried out in the other groups of CEPE is also relevant to EuACA. However, the specificity of artists' colours products requires some special attention, as in the case of TiO₂.

The new labelling requirements for TiO₂ will apply to all our products including those of EuACA members (see article on page 9). For liquid mixtures containing 1% (w/w) or more

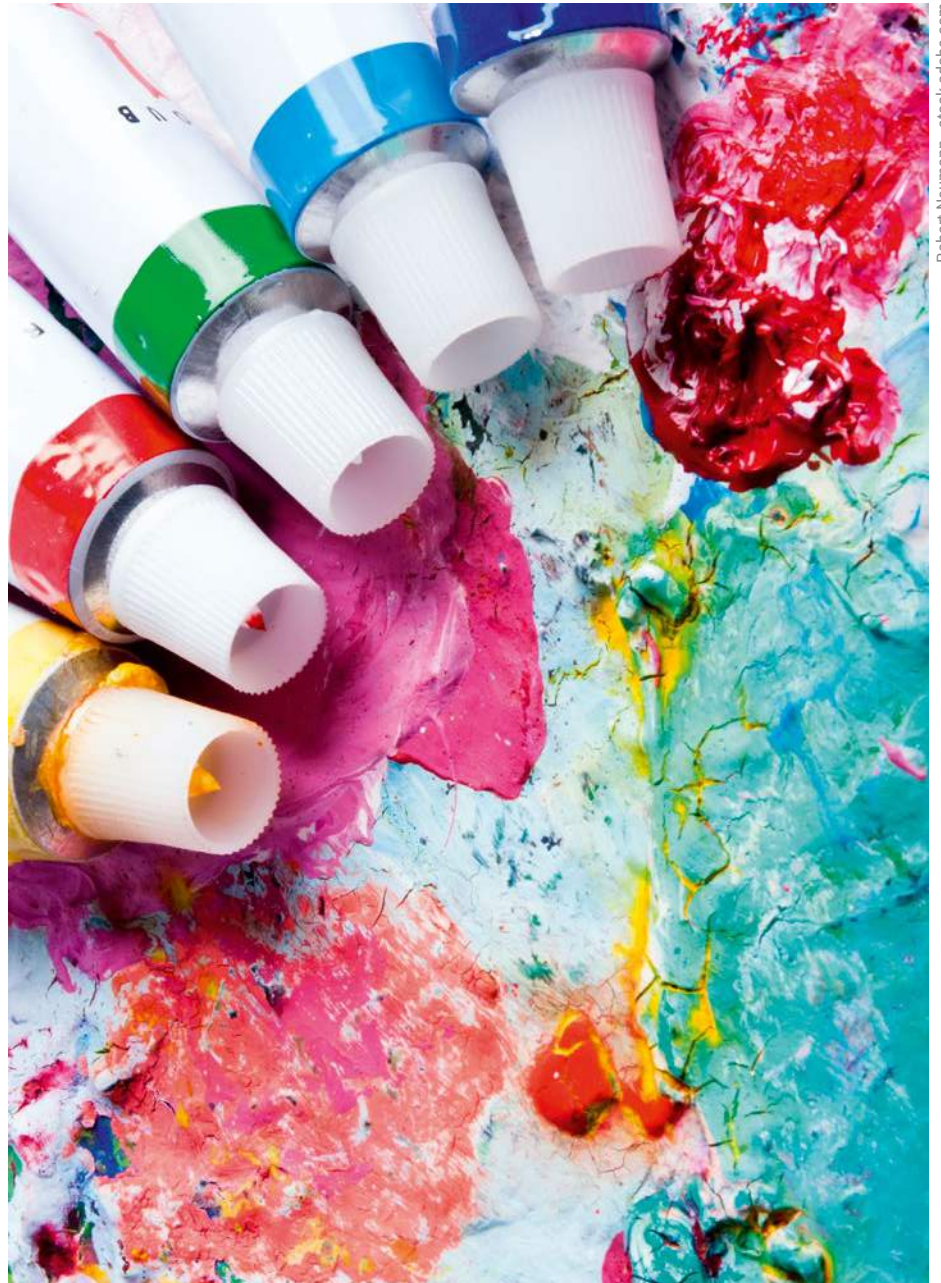
of TiO₂, the EUH211 warning will need to be affixed on the product or the packaging and the EUH212 warning for solid mixtures.

In addition, several artists' colours (AC) products also fall under the scope of Directive 2009/48 on the safety of toys (TSD), which prohibits, by default, the presence of Category 2 CMR substances, such as TiO₂. The TSD has also revised the migration limits for aluminium and formaldehyde which will apply as of 20 May 2021. The limits apply to toys intended for use by children under 36 months of age

or toys intended to be placed in the mouth.

Standards are also an important component of the TSD. Therefore, the TC closely follows the developments of standard EN-71, for toys in particular part 3 (chemical elements) and part 7 (finger paints), and participates in CEN/TC/52/WG 5 (safety of toys – chemical properties).

One of the more political issues of the moment is the proposal for a restriction on the intentional release of microplastics (see arti-



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cle on page 14). While EuACA members had originally expected to fall out of the scope of the restriction, this is not the case. They are exempt from the proposed restriction on placing them on the market but will be impacted by the communication and reporting requirements.


What can we do and how

Considering the nature of AC products i.e. hobby, creative work etc. and the fact that spraying is unlikely for liquid mixtures and that no dust is formed in solid mixtures, the affixing of a label on several of AC products is inappropriate. The TC has drawn up an extensive list of all these products which will be presented to the European Commission in the autumn, together with a request for a derogation.

Meanwhile, CEPE is providing Toys Industry Europe with all the necessary technical information to support their request for a derogation for the use of TiO₂ in toys. A decision is expected in Q2 2021.

Regarding microplastics, the TC has updated its brochure on “Best practices in the handling and disposal of waste Artists’ Colours and their packaging” to address the new requirements.

Next steps

The TC will continue to work on all of the issues of relevance to the sector of AC, in particular the request for a derogation to label products containing TiO₂ and the usage of TiO₂ in toys. 



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Can coatings

Can coatings, which are in contact with food, are facing a growing level of attention in Europe. The safety of food materials lies mostly with the industry. The Sector Group Can Coatings is assisting manufacturers with this task and keeping up with legislative changes.

The issue

There is growing concern amongst the EU population about all aspects of human-made chemistry and a lack of trust that industry is doing a proper job in placing safe products on the market. This is also true for can coatings which are in direct contact with food. The European Parliament has heard the concern and has put pressure on the European Commission to act. The latter has commissioned a study to understand if the current regulatory framework is fit for purpose. The final report was made available in July 2020 and concludes that “the overall performance of the legislative framework is not completely satisfactory due to insufficient availability of resources and important gaps in implementation and enforcement”.

The EU regulatory and political environment

Coatings for rigid metal packaging is essential to preserve food in healthy conditions

for long periods. The coating prevents food contact with the metal and thereby ensures the quality of nutrition. Food contact materials are regulated under the Regulation (EC) No 1935/2004 on materials and articles intended to come into contact with food. This regulation requires that materials and articles in contact with food be made according to Good Manufacturing Practices so that, under normal and foreseeable conditions of use, they do not transfer their constituents to food in quantities that could endanger human health. The European Commission may adopt specific measures such as a list of authorised substances, which it did for plastic materials, through the European Food Safety Agency (EFSA).

However, the establishment of such lists requires significant resources which explains why they do not specifically exist for other materials such as coatings, glass, paper, ceramic, cutlery, rubber, adhesives and cork.

At the time, CEPE developed a Code of Practice to guide coating manufacturers and their customers to comply with the Regulation (EC) No 1935/2004. One of the sections of the guide identifies the substances that may be used and those that should not be used. Specific reference is made to the EU positive list for plastics but also to other acceptable lists established by various bodies.

The regulation also requires that traceability is ensured at all the stages of the production process in order to facilitate control. Procedures and documents are in place throughout the supply chain, however, due to its complexity it is difficult for the -outside world to understand and trust what is in place.

The safety of such materials in contact with food mostly lies with the industry, which makes it open to criticism. The European Parliament and European Commission are also calling for more scrutiny. For instance, EFSA, who is responsible to assess pesti-



The priority is to ensure a high level of safety and to prevent disproportionate legislation. »

cides, was put under significant pressure and its neutrality and independence was challenged following the examination of glyphosate. Increasingly, science is subject to controversy and several dossiers are treated on the basis of a political agenda.

What can we do and how

The CEPE Can Coating group is made up of a limited number of companies but which represent the bulk of the market. The experts participating in this group have been, for the most part, working in this area for many years. A close working relationship is also established with Metal Packaging Europe, who represents our members' customers and CEFIC, who represents our members' suppliers and Food Drinks Europe (FDE) who represents the end-users. Good communication along the supply chain is essential and has been in place for many years.

A cross sector group was also set up for industry sectors, who produce or use ma-

terials which come in contact with food, in order to adopt uniform principles to ensure compliance with legislation on food contact materials.

To date, risk assessment and risk management principles have been agreed upon. Each sector has to identify exactly how safety is ensured throughout its supply chains. Trust and transparency will be improved by the development of tools designed to help enforcement authorities. This work aims at helping the outside world have more insight in what industry is doing and thereby reduce concern about leaving safety in the hands of the industry.

What have we achieved

The agreement by many industry sectors of uniform principles for risk management and risk assessment is a success. Within our joint industry a dedicated group (TSC-35) was established and is developing guidance to demonstrate safety in food contact mate-

rial and discussing the concept of a database to facilitate the work of enforcement authorities. This work is essential to, ultimately, be able to demonstrate to the outside world that industry is acting responsibly and thereby avoid unnecessary new legislation.

Another group (TSC-32) has been working for the last two years on a dedicated project on a specific substance and is progressing as planned despite the Covid situation.

What are the remaining steps

As stated above the priority is to ensure a high level of safety and to prevent disproportionate legislation. There is still much to come. We will have to see how the European Commission is going to react following the publication of the recent study. The European Commission has announced in its Farm to Fork Strategy that it will present a proposal for a revision of EU legislation on Food Contact Materials in Q4 2022. Given the current EU political environment and the increasing concerns as regards endocrine disruptors and non-intentionally added substances etc developments are likely. CEPE will continue to support the necessary work of the Can coatings group. ◀

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Decorative coatings

Substances contained in products, intended to be used by the end consumer, are increasingly under scrutiny by decision-makers.

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The Issue

Currently the topics that rank high on the agenda of the decorative coatings' sector are biocides and the voluntary schemes: EU Eco-label and Product Environmental Footprint (PEF).

Biocides

Biocide in-can preservatives classified skin sensitizers may not in the future be used in consumer paints, hence threatening the future possibility to sell well preserved paints to this user category. Biocide dry-film preservatives, which are needed for exterior coatings (and indoor in wet rooms like bathrooms) are also under threat.

EU Eco-label and PEF

As the number of substances classified increases, the number of requests for derogations submitted in the framework of the EU Eco-label and other national labels is also on the rise. This is because eco-labels exclude several hazard categories, which puts the future of the eco-label system at risk.

In parallel to the work on the EU Eco-label, the DECO groups also oversee the developments as regards the PEF. CEPE embarked on the innovative initiative launched by the European

Commission to measure the environmental performance of a product, namely paints, in 2013. CEPE was motivated to join the PEF project due to the fact that the quality (durability) of paint is valued in combination with its impact on the environment over the full life cycle of the paint, thereby offering a more holistic approach than other existing initiatives, such as eco-labels. Also, CEPE rated the possibilities for innovation higher in PEF than in Ecolabel. The reason being that PEF prescribes performance instead of ingredients.

Sell through period for relabelling

One of the consequences of a reclassification of a substance, is the issue of sell-through period. Indeed, once a substance is officially re-classified, the normal period available for re-labelling is 18 months. Yet, 18 months is too short for slow moving products in the supply chain like paint and artists' colours, if the interpretation is that, all products at any stage of the supply chain have to be re-labelled (not only the first placing on the market).

Data Depository System

Many downstream users need additional (or more in-depth) information than the information provided by their suppliers in the Safety Data Sheets (SDS). This includes information

to work safely with the chemicals that they have bought or to calculate and prepare SDS's for their downstream users purchasing their formulated products or to answer questions from their customers relating to safety – or product stewardship aspects which are not covered by the SDS. Therefore, CEPE is looking into developing an information system between our industry and our suppliers for an easy exchange of information.

The EU regulatory and political environment

The above-mentioned issues are linked to several pieces of legislation: Regulation (EC) No 66/2010 on the EU Ecolabel, Regulation (EU) No 528/2012 concerning the making available on the market and use of biocidal products, Regulation (EC) No 1907/2006 concerning REACH, Regulation (EC) No 1272/2008 on CLP and often find their origin in a substance being given a new adverse classification. Indeed, CLP is central and has a direct impact on all other pieces of legislation. This hazard based system triggers consequences that are unfortunately not based on the safety of use of a substance but on perception.

What can we do now

Biocides

For a complete update on biocide in-can preservatives and consumer paints, see separate article on page 20. However, it should be noted that the important advocacy activities ongoing for in-can preservatives should benefit the dry-film preservatives as well. The latter are in an even more critical situation due to the fact that there are very few remaining algacides and fungicides available to protect the applied film during many years.

CEPE participates in public consultations to support these substances. CEPE has also embarked, some years ago, in the study of the leaching behaviour of dry-film preservative substances in different outdoor coating categories. The objective is not to generate leaching figures to be used in risk assessment dossiers, but to identify the outdoor coatings

where substances leach the most in order to identify worst case coatings and to facilitate the future authorisation of the biocidal products by the suppliers, hence helping our industry to get enough product offering in the long term.

EU Eco-label and PEF

Regarding the EU Eco-label, CEPE works closely with the EU Eco-labelling Board (EUEB) to explain the difficulties of our sector and, when necessary, to request derogations.

DG ENV is quite keen for an integration of PEF into the EU Ecolabel, but some EUEB members are not in favour. CEPE has expressed its doubt on the proposed ways to do this. Indeed, some initial screening among CEPE members, shows that products with the EU Eco-label do not always result in the better PEF scores. The DECO Sector Group acknowledges the pros and cons of an integration of PEF into the EU Eco-label, but would not accept an integration that would violate the principles of comparing products on the basis of environmental impact.

Sell through period for relabelling

The issue of sell-through period for re-labelling is not only relevant for our industry. Therefore, we have started discussing the issue with other associations. Together, we will have to approach the European Commission and the Member States to try to agree on an interpretation as to which products need to be re-labelled and at what stage of the supply chain.

Data Depository System

CEPE was contacted by an upstream supplier who initiated a project to ease regulatory data collection and exchange in the supply chain. CEPE has established a group to work on a Product Stewardship and Regulatory Data Depository which should improve productivity by ensuring i.a. consistency and up-to-date information. This will be achieved by means of a harmonised questionnaire for data collection and a central database in which suppliers bring in or modify the data for their products and where downstream users access and read or download the information provided by the suppliers.

What have we achieved

Biocides

As explained in the separate articles on biocides, for biocide in-can preservatives we have achieved a clear momentum whereby the European Commission and Member States now understand the importance of these substances and the need to find a solution.

Building on the success of biocide in-can preservatives, CEPE has also successfully increased the attention of authorities on biocide dry-film preservatives. We have also finalised the laboratory testing of the leaching project and the report of the semi-field leaching part is close to finalisation.

Ecolabel and PEF

Over the past 12 months, CEPE has contributed to the discussions surrounding several derogations for substances of relevance for our sector. Regarding PEF, the project was completed in 2018 for the four paint categories of decorative paints, namely:

- Indoor mineral substrates: walls and ceilings
- Indoor wood substrates: doors and window frames
- outdoor mineral substrates: walls
- outdoor wood substrates.

Following this completion, CEPE started disseminating information on PEF to its members that manufacture decorative coatings.

Sell-through period for re-labelling

Prior to of the deadline of 1 May 2020, the Deco group issued a guidance on the sell-through period for re-labelling of products containing MIT.

Data Depository System

The Deco group agreed to dedicate time and resources to the project on the data depository system.

What are the remaining steps

Biocides

The biocide in-can preservatives dossier is a critical dossier and is in the hands of the CEPE Biocide User TF to which the Deco members of CEPE actively contribute.

The outcome of the project on biocide dry-film preservatives will be explained to the relevant authorities at the ECHA Biocidal Product Committee WH Environment.

EU Ecolabel and PEF

CEPE has requested a derogation for titanium dioxide. In addition, another derogation for a titanium dioxide surface treatment organic substance will be needed. We are still also waiting for the EU Ecolabel Board to take a position with regard to the future classification of paints due to skin sensitising preservatives.

The PEF Technical Secretariat is working on the final parts of the PEF in very close collaboration with the DECO Sector Group. Before a Board decision on a possible market introduction in Q2-Q3 2021, the focus is on:

- Inclusion of toxicity modules;
- Inclusion of performance classes (A–E);
- The requirements for external verification (expertise and price);
- Supporting communication for going to market with PEF.

There is also a need to reach out to retailers to ensure their acceptance of the PEF as a performance label.


It should be noted that the PEF for outdoor wood substrates needs further evaluation. Therefore, its introduction to market will be later than for the other categories.

Further discussions will also take place in the different Deco groups with regard to the future of the EU Ecolabel and PEF.

Sell-through period for re-labelling

The Deco groups will continue to support initiatives with other downstream users to correct the interpretation of “the first placing on the market”.

Data Depository System

Although this is not a major priority, the Deco group aims at pursuing this issue. The focus will be on reaching an agreement on a harmonised questionnaire and evaluating providers for the build-up of the data depository. 

Sustainable use of anti-fouling paint

Anti-fouling paints have been under continuous legislative pressure in recent years. The Anti-fouling Group and Biocide User Task Force have been active in the advocacy of anti-fouling coatings towards authorities, creating a document on the sustainable use of biocidal anti-fouling paints.



The issue

Some national biocide authorities are very critical about the continued use of anti-fouling paints, especially on pleasure crafts. Their agenda – aligned with the general agenda on biocides (see article on page 20) – is to reduce the use of biocides as much as possible or to eliminate them. In the case of pleasure crafts the situation has reached a point requiring separate actions.

The EU regulatory and political environment

For the general regulatory and political environment, see article on biocides (on page 20).

Members have now applied to obtain authorisation for most of their biocidal products used in anti-fouling paints. After the approval at EU level of all the active biocide substances, the formulations which contain them (the

biocidal products) also have to be authorised. The time between the submission of the dossiers and the first signs from the relevant national authorities can be of three years. In the meantime, additional discussions are taking place with regard to the environmental risk assessment of anti-fouling paints. This leads to changes in guidance and approaches resulting in legal uncertainty on the investment made. The dossier cost and the Member States' fees can easily amount to €500.000 for one paint.



« The Biocidal Product Regulation (BPR) in the EU has significantly reduced the availability of biocidal active substances, from more than fifty notified substances to only nine remaining substances. »

The CEPE Biocide User TF is in charge of carrying out the general advocacy activities on biocides. Currently, it focuses on anti-fouling paints. One of its most recent actions was the development of the paper 'Sustainable Use of Anti-fouling Paints'.

What have we achieved

In addition to the ongoing work described above, the group finalised a 20 pages document on the sustainable use of biocidal anti-fouling paints. It covers the following topics:

- The need for fouling control
- Use scenarios
- Type of users
- Anti-fouling active substances
- Assessing the environmental impacts of anti-fouling
- Anti-fouling tolerance
- Regulatory review of anti-fouling and label instructions
- Best practice guidelines

And concludes as follows:

“Anti-fouling paints offer essential benefits. By limiting the possibility for aquatic organisms to adhere to ships hulls they reduce fuel consumption, and hence reduce CO₂ emission. They also reduce the potential for invasive species to affect our natural eco-

systems and prevent organisms affecting the intrinsic property of the coating, thereby delaying corrosion and increasing the service-life of vessels. This counts for boats and vessels in fresh water as well as in sea water.”

There are currently no effective alternatives applicable for all situations.

Effective anti-fouling paints depend on the availability of biocidal active substances. The Biocidal Product Regulation (BPR) in the EU has significantly reduced their availability, from more than fifty notified substances to only nine remaining substances, available to control both hard and soft fouling from an enormous diversity of natural organisms that search for a substrate to live on.

These remaining active substances can, by no means, be compared with substances that were previously withdrawn worldwide from anti-fouling uses, such as TBT. Their transformation is much faster, and they are not subject to long range transport in nature. Their acceptable risk is examined during review under the BPR and they cannot be approved in case of unacceptable risk, both for human health and the environment.

What can we do and how

The Anti-Fouling group of CEPE has been active for a long time and has often struggled with the developments stemming from the biocides legislation. It has helped decision-makers understand anti-fouling paint, refine risk assessments and advocate on the benefits of these paints. It is now deeply involved in the Coordination Group of the European Commission and Member States dealing with product authorisation.



« Some national biocide authorities are very critical with the continued use of anti-fouling paints. »

In addition, other EU legislation protects workers at the workplace (OSH) and protects the environment under, e.g. the Industrial Emissions Directive and local environmental permits. Consumers that apply anti-fouling paints are more effectively provided with safety advice and best practice recommendations than other consumers that use biocidal products. They are made available at the paints' point of sale in marinas and from the comprehensive information on safe-use made available on the internet by the paint manufacturers.

The benefits of anti-fouling paints should be considered when evaluating their re-


quest for authorisation under the BPR and when setting protection goals. Taking a holistic view is the best regulatory approach and for biofouling this includes minimising fuel use with the associated CO₂, NO_x and SO_x emissions and in addition minimising the risks associated with invasive species.

The sustainable use of anti-fouling paints is an approach that integrates all these elements. Currently biocidal active substances are an integral part of the sustainable use of anti-fouling paints. Innovation has taken place already, and will continue, to maintain the essential benefits while min-

imising adverse effects to human health and to the environment.

The group has also been working on a document for policy makers. It elaborates on risk assessments and demonstrates how adding safety factors at different points of the assessment leads to over-conservatism and an absolute disproportionate approach.

What are the remaining steps

We have to promote this document when we meet with decision-makers in order to prepare for the actions that still lie ahead. 



Intumescent coatings

A mandatory CE marking of reactive intumescent coatings for the fire protection of structural steel seems a long way off.

Mandatory CE Marking – long term goal

Déjà vu – all over again

As CEPE we are seeking for a mandatory CE marking of reactive intumescent coatings for the fire protection of structural steel. Unfortunately, we seem to keep moving further away from this goal, rather than moving towards it.

The European Commission is continuing with its review of the Construction Products Regulations (CPR), and is now proposing a range of different scenarios which are under consideration. These range from minor tweaking of the existing CPR, to abolishing the whole regulation and allowing the market to dictate rules. One approach under consideration involves removing the roles of the European Committee for Standardisation (CEN) and the European Organisation for Technical Assessment (EOTA) in CPR. CEPE members support minor adjustments to the existing CPR, rather than the other options which promote greater change.

From the outside view, the CPR review is proceeding very slowly, due to legal issues raised because of the European Court of Justice ruling on the James Elliott case. The ruling from the case that product standards have a legal basis, has major ramifications from a product standard development point of view. This has resulted in issues with the updating of existing harmonised EN product standards, which the European Commission is prioritising over the issuing of new standardisation requests. Therefore, we are now some considerable distance from getting our standardisation request discussion back on the agenda.

Voluntary action remains the main hope

In order to drive improvements in clarity of product certification, CEPE members are considering setting up a CEPE certification log, which will list details of members certification. This would be promoted as an exemplar of best practice in certification.

We have also been looking at the product standard documents. We are looking to revise the CEPE guide on the quality control of intumescent coatings, which was first produced in 2008. This document is the forerunner to EN16623 product standard, and the revised CEPE document will be used to help draft the next review of EN16623, which we hope will come out once we have the standardisation request issued.

Other industry issues

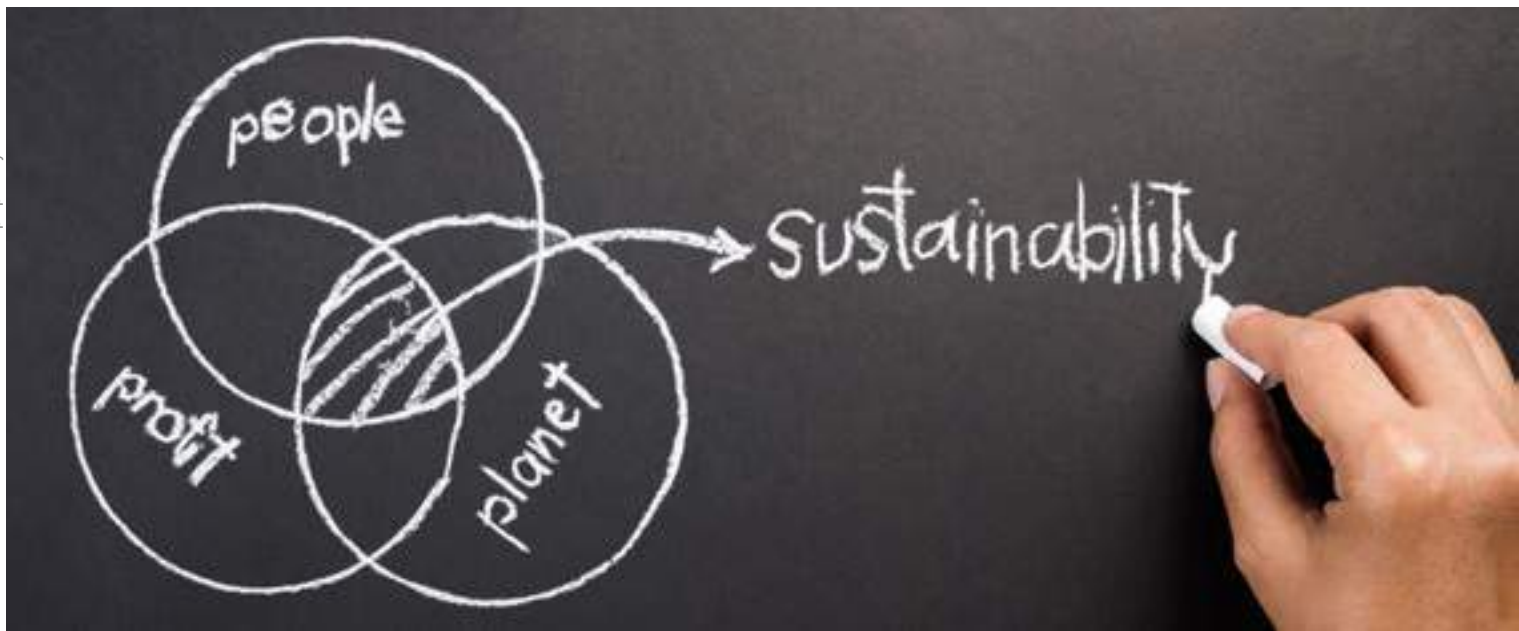
Attempts to deal with questionable assessments being carried out by some Technical Assessment Bodies (TABs), have proven unsatisfactory. The market surveillance and enforcement authorities seem unwilling or unable to do anything about these unsafe assessments. In many cases the technical arguments are well beyond their capabilities. Rather than take a negative stance, we are drafting a best practice guide to advise against some of the more erroneous practices. ◀



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CEPE Sustainability Tools

CEPE started working on sustainability issues in 2010 and published a Sustainability Charter in September 2012. The charter encourages CEPE members to look at the full Life Cycle of their products while keeping in mind the three pillars of sustainability: People, Planet and Profit.



Over the years, CEPE has developed several tools to help members in their quest for more information on the impacts of their products on the environment.

CEPE LCI project

In order to carry out a life cycle analysis (LCA), expertise is required. It also has a cost. One of the major costs is the database to use information behind each life cycle stage of the paint product. In 2011, CEPE embarked on the CEPE LCI (life cycle inventory) project to provide members from all CEPE sectors with harmonised (LCI) database for the industry's most important raw materials and three manufacturing processes. These data are offered in three formats: SimaPro, Gabi and Excel.

The CEPE LCI database requires an LCA expert with their own (generic) LCA software or tools in order to do the analysis of a product. For the companies that do not have an expert, CEPE created the Ecofootprint tool specifically focused on LCA calculations for coatings. This tool is a user friendly LCA calculator that a user can use by inserting the bill of materials of his formulation and a few details of

its manufacturing. It is available via: <http://ecofootprint.ecomatters.nl>. The end result is a report on 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).

« In order to carry out a life cycle analysis, expertise is required. It also has a cost. »

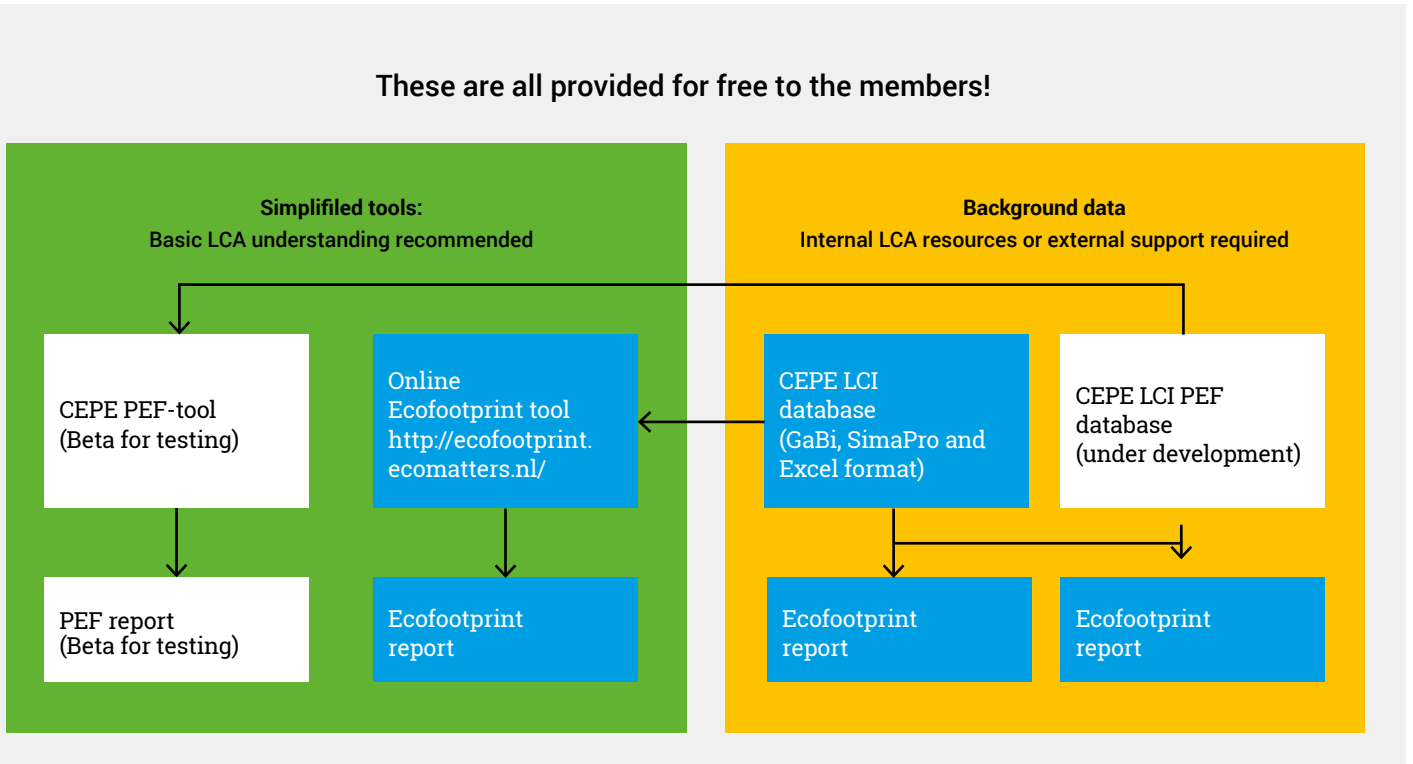
To date, some 50 CEPE member companies have used the CEPE LCI data and over 250 individual users have used the Ecofootprint tool.

Product Environmental Footprint (PEF)

PEF is part of the "Single Market for Green Products Initiative" launched by the European Commission. Its goal is to make it easier for companies to put green products on the European market and for consumers to identify them. The PEF methodology is an LCA (Life Cycle Assessment) method designed to be a standardised way of measuring the environmental performance of a product

CEPE joined the pilot phase for the PEF project for the decorative paints sector during 2013. This work was finalised in 2018. Since, CEPE has been moving forward to enable its members to start using the PEF method as developed during the pilot. This was done during 2019 by developing a PEF (excel) tool and a rollout to many of the national associations to create awareness and provide information.

Figure 1: What does CEPE offer you?



The beta test version of the PEF tool is done and can be used, but the PEF methodology and data is being refined so the results are not finalised. This is expected in early 2021. There are a couple of elements missing such as the inclusion of the toxicity impact categories, updated raw material datasets and the creation of performance classes.

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

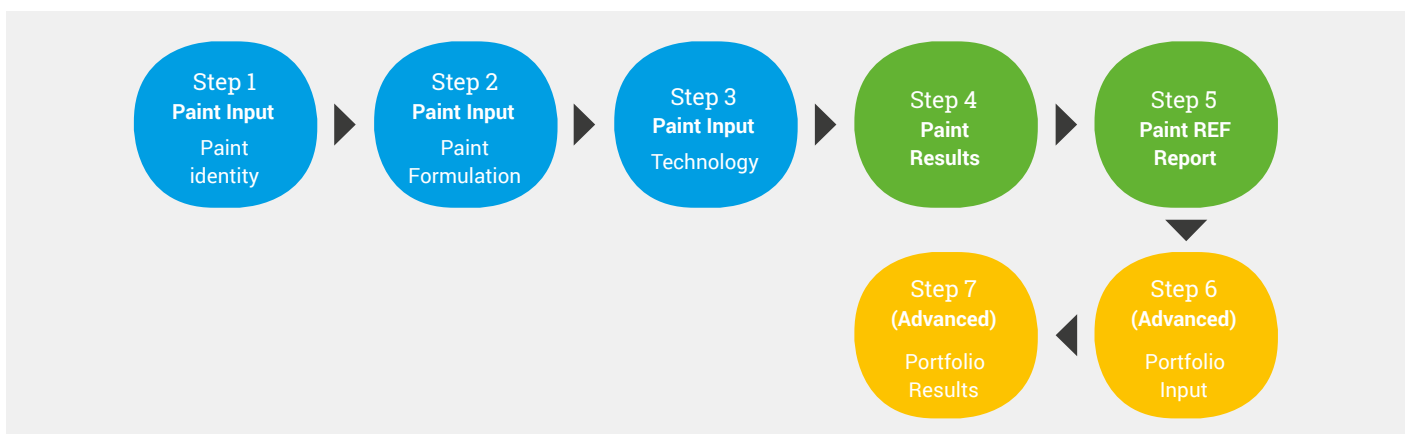
- Bill of Materials,
- VOC content,
- Results from PEF durability tests and
- Site specific data for the manufacturing of this product,

the tool produces the results in terms of PEF score and its 16 impact categories. The user

can also set a portfolio analysis for up to 50 different products. This enables him to compare the different products in terms of PEF score and CO2 emissions.

In addition there are still open work items regarding external verification and supporting communication for going to market with PEF. These items are being addressed in the Technical Secretariat under the supervision of the Deco Sector Group.

Figure 2: Three-step data insertion process



Emerging issues

The European Green Deal is designed to combine the twin challenges of digitalisation and increased sustainability. It shall transform the European Union into a modern, resource-efficient, and competitive economy with no net emissions of greenhouse gases by 2050.

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The issue

The European Green Deal

On 11 December 2019, the European Commission published its new growth strategy, the European Green Deal, that shall combine the twin challenges of digitalisation and increased sustainability.

The Green Deal shall transform the European Union, not least by a Climate Law, into a modern, resource-efficient, and competitive economy where there are no net emissions of greenhouse gases by 2050 and where economic growth is decoupled from resource use. The actions shall boost the efficient use of resources

by moving to a clean, circular economy that restores biodiversity and cuts pollution.

As such, the Green Deal represents a new policy framework and contains a roadmap with numerous initiatives over the next five years. The most important initiatives for our industry are, especially, the Chemical Strategy for Sustainability, the new Circular Economy Action Plan and the Farm to Fork Strategy (due to the review of the Food Contact Material legislation in Q4 2022).

New Circular Economy Action Plan (CEAP)

The CEAP, with its 35 initiatives over the next

years, seeks to tackle climate and environmental-related challenges at product level, in value chains (i.a. vehicles, packaging, plastics) and at the waste stage.

Several initiatives are of interest to our industry. This includes the establishment of a 'sustainable product policy framework' which represents a widening of the Eco-design Directive to the broadest possible range of products to make them climate-neutral and resource-efficient. In the preparation of the framework, 'sustainability principles' will be considered, such as durability, hazardous chemicals and extended producer responsibility.

« The Green Deal shall transform the European Union, not least by a Climate Law, into a modern, resource-efficient, and competitive economy. »

establish a safe secondary raw material market. The key objective is to remove contaminants that persist and prevent recycling and to establish clean waste streams, free of hazardous substances.

In addition to these initiatives, the CEAP foresees a review of several relevant legislations for our sector, e.g. a review of the Industrial Emissions Directive, the Packaging and Packaging Waste Directive (to reinforce the essential requirements for packaging) and the Waste Framework Directive. These reviews are coupled with specific measures, including i.a. mandatory requirements on recycled plastic content and plastic waste reduction measures, e.g. for packaging, construction materials and vehicles, measures against the unintentionally release of microplastic and the further promotion of extended producer responsibility schemes.

Chemical Strategy for Sustainability (CSS)
At the time of writing this article, the CSS, currently scheduled for Q3-2020, has not been published. Indicative information however outlines several measures, e.g. strengthening the EU framework on endocrine disruptors, measures with regards to the 'cocktail effect', and new SVHC categories under REACH. In its statement on the CSS, the European Parliament welcomed these and additional measures.

The EU regulatory and political environment

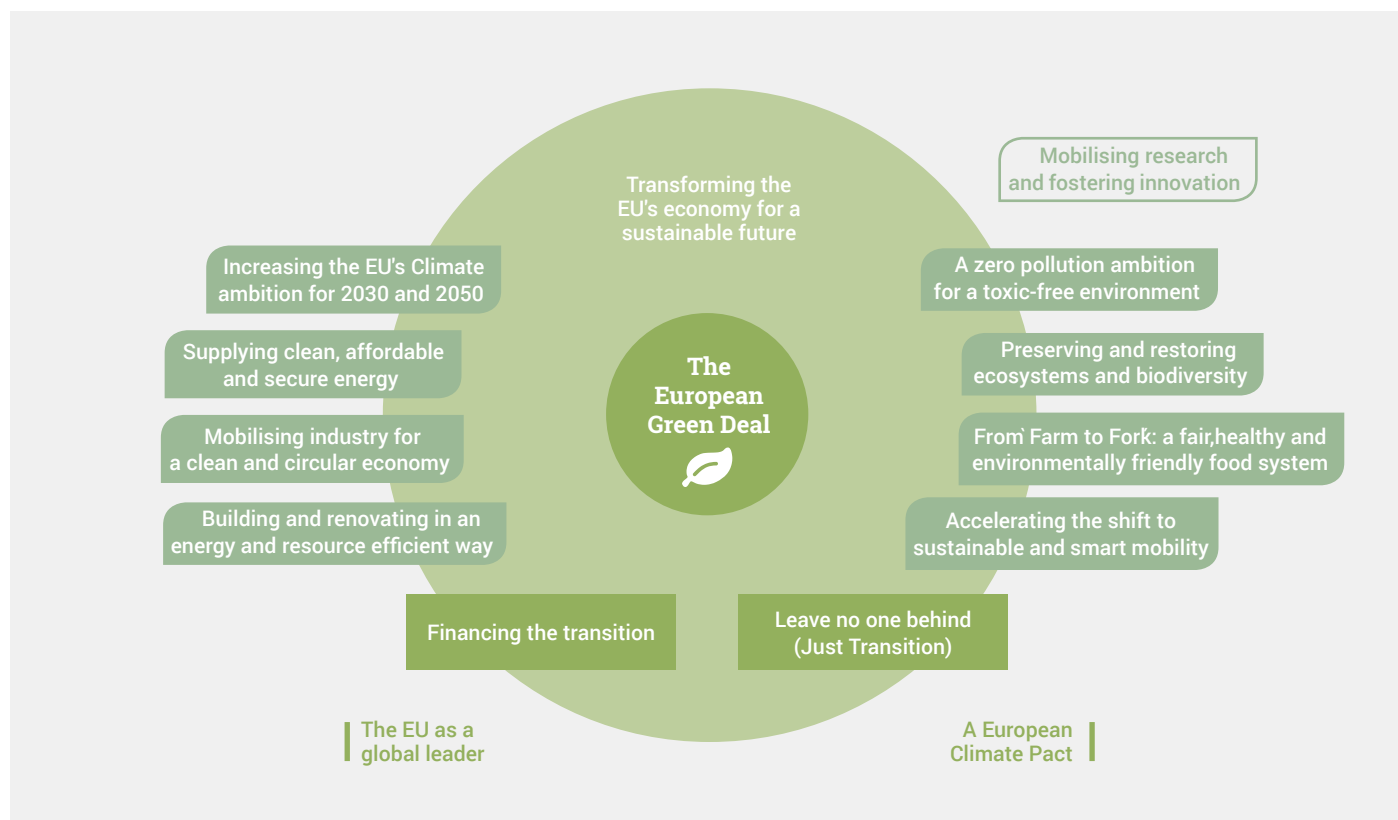
In the 2019 European Parliament elections, the conservatives and social democrats remained the largest parties, but their loss benefited the liberal, green, and nationalistic parties. Both the Liberals and Greens promote a stronger environment policy.

In this light and the global climate challenge, the conservative Ursula von der Leyen made environmental and sustainability policy a cornerstone of her election bid to become President of the European Commission. Her political guidelines set out the ambition of the European Green Deal and to make Europe the first climate-neutral continent.

As a sector, we agree and support the good intentions. However, the devil lies in the detail and it is the implementation that requires utmost attention and caution, also considering the amount of new initiatives. The EU Green Deal covers many aspects of possible changes to our way of living such as a Circular Economy with better recycling, lower dependency of raw materials, a more sustainable manufacture of durable and repairable materials, a carbon neutral Europe for a significant shift to sustainable energy and lower fossil fuel consumption, an extended producer responsibility, etc.

Consumer empowerment and facilitating green product choices is another initiative. The European Commission wants companies to 'substantiate their environmental claims' using Product and Organisation Environmental Footprint (PEF/OEF) methods. In this regard, the European Commission will further test the integration of these methods in the EU Ecolabel and include more systematically, recyclability and recycled content in the EU Ecolabel criteria.

A link to the Chemical Strategy for Sustainability with its 'less toxic environment' aspiration is made with the initiative to es-



Amidst this series of measures, the CSS will be of high relevance. Behind the term 'sustainability' are several measures that could negatively impact our industry. The European Parliament's latest statement on the CSS underlines the EU citizens dissatisfaction with the progress of existing chemical legislation, especially regarding endocrine disruptors, nano materials and the cocktail effect. Under the current political environment, one cannot exclude that all this will result in further pressure on chemicals.

What can we do and how

The heightened interest in sustainability is important to be aware of. While the publication of the strategies set the direction, the many measures (which will also affect REACH and CLP) and their critical nature make preparation crucial. It is now key to prioritise, draw redlines and prepare arguments for the discussions ahead. CEPE needs to closely follow the developments, draft workable solutions and get prepared to act with policy makers to defend the interests of our sector.

What did we already achieve

In June 2020, CEPE commented on the CSS in a public consultation and outlined our expectation. We think that the existing legislation delivers well and should be carefully strengthened. A holistic approach is needed to answer the societal challenges and decisions in chemical policy and should be

« The Green Deal represents a new policy framework and contains a roadmap with numerous initiatives. »

based on sound science using risk, not hazard based assessment.

In July 2020, CEPE provided comments to the public consultation on the Packaging and Packaging Waste Directive in which we reiterate that achieved packaging functionalities should not be abandoned to suit environmental criteria.

What are the next steps

In preparation of this uncertain future, CEPE is establishing new working groups that require the involvement of members and national associations alike and to help relay the messages. CEPE will also liaise with other industry associations to align messages.

Our industry is providing products which largely benefit our society. We will ensure that policy makers well understand their benefits and we will seek to balance the aspiration for a "less toxic environment" with the need to have a sustainable economy and society. ◀

Servowood Project

Weathering tests continue

The objective of the Servowood project was to improve the “predicting of the life time of coatings on wood”. This project, carried out by a Consortium of Research Institutes, SMEs and their associations ran from January 2014 until December 2016. The project entailed evaluating the responses of 3800 panels of coated wood after these panels had been exposed to a variety of doses (amounts) of typical weather parameters (UV light, water and temperature), both in real outdoor conditions and in accelerated weathering in the laboratory.

The essence of this project was to study the degradation of coatings that results from the exposure to the different doses. The 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.

Extending the weathering tests enabled by sponsors


In December 2016, the Servowood project officially ended, as did the funding by the European Commission. The scientists who had participated in the project were keen to extend the weathering test of the panels, beyond the period of the project which was of 18 to 24 months.

Indeed, the short exposure was insufficient to reveal the limit state of most coatings. Therefore, more data on coatings degradation could be obtained if the weathering of these panels were to be extended. Some of CEPE members and several resin suppli-

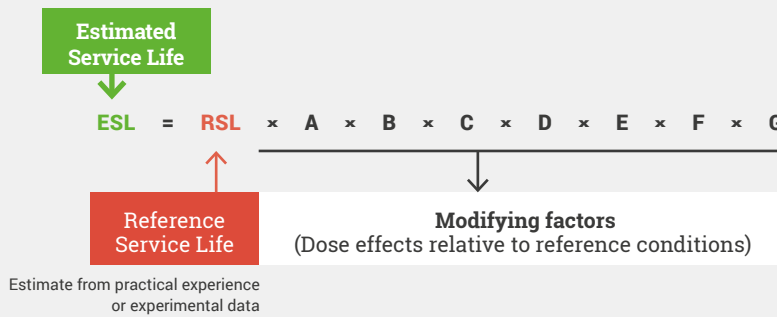
ers found sponsors to pursue the outdoor weathering tests at three sites in Europe. The results of these extended weather tests will consolidate the factors in the service life prediction model, as well as improve the accuracy of the extended service life predictor.

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

Service Life Predictor

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: 

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)

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It is foreseen to have a web-based version available that will look like this

World Coatings Council

WCC (World Coatings Council) represents the interests of the coatings industry at the 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.



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World Coatings Council

As a European association, CEPE normally operates at EU level. However, challenges are increasingly global requiring action at international level.

WCC (World Coatings Council), previously IP-PIC (the International Paint and Printing Ink Council) represents the interests of the coatings industry at the 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 non-European members represented in WCC include the USA, Canada, China, South Africa, Mexico, Japan, Australia, New Zealand, Turkey and Brazil. The 2020 annual meeting was hosted by the Brazilian association ABRAFATI in Salvador.

Besides working on similar issues as CEPE such as TiO₂, biocides and microplastics, the WCC also participates in several initiatives, many of which are in the framework of the United Nations (UN) or related agencies:

Responsible Mica Initiative (RMI)

WCC is a member of RMI, which is seeking to engage the supply chain for natural mica pig-

ments and paints to address child labour issues. Working across industry sectors that include cosmetics, electronics, automotive and paints, RMI seeks to act locally to offer social opportunities in lieu of child labour, specifically supporting education and diversification of employment and other opportunities. Other RMI activities include supply chain traceability standards, and legislative action.

UN Lead Paint Alliance (LPA)

The recent focus of the LPA has been on engaging governments around the world to put in place enforceable restrictions on the use of lead in paint. The mechanism for this has centered on a project initiated under a grant from the Global Environment Facility (GEF) to the Strategic Approach to International Chemicals Management (SAICM) which is funding global outreach to governments. WCC currently serves on the advisory board to the project

UN Activities on Transport of Dangerous Goods and Globally Harmonised Standards

WCC is keen to try and advance discussions in these groups. In particular WCC seeks to identify any regulatory compliance issues with the current Transport of Danger-

ous Goods (TDG) and Globally Harmonised Standards (GHS) guidance so as to allow WCC to propose consensus solutions. It is also keen to work with other industry representatives to develop a more appropriate revision schedule for the GHS as the current schedule operates to deter harmonisation of labels.

The WCC has also decided to step up its efforts as regards sustainability. Therefore, it organised a workshop to consider the support the coatings industry could provide to the UN's Sustainable Development Goals (SDGs).

The workshop featured three group exercises that assessed the critical SDG's that relate to the coatings industry, the types of activities member associations can undertake to support them, and Key Performance Indicators (KPI's) that could be used to affirm contributions.

A number of possible action items emerged from the workshop, the most important of which is developing a WCC Sustainability Report. Since then, a consultant has been hired to draft the report. CEPE will be in the advisory group supervising the work of the consultant.



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.



André Viera de Castro, Chairman
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



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



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



Till Iversen
Imparat Farbwerk

Position in Company

CEO

CEPE Board Member since
2016

Other association responsibilities/experiences

Vice-chair of Northern division of VdL



Geof Mackrill
Teal & Mackrill

Position in Company

Managing Director

CEPE Board Member since
2016

Other association responsibilities/experiences

Board member of the British Coatings Federation.



Klaus-Georg Gast
Axalta Coatings

Position in company

Business Director Powder Coatings Europe

Other association responsibilities/experiences

Participant in meetings of VdL.

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).

Board members for reelection



Heiner Klokke
Hubergroup

Position in Company

CEO, global development and strategy

CEPE Board Member since

2017

Other association responsibilities/experiences

Chair of the EuPIA council



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 VNCI



Daniel Llinas
Industrias Titan

Position in Company

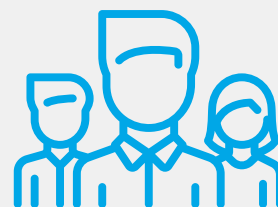
CEO

CEPE Board Member since

2017

Other association responsibilities/experiences

Board Member of EURIMA, European Insulation Manufacturers Association.



Entering board members



Martin Beck
BASF Coatings

Position in Company

VP Global Procurement & Supply Chain Excellence



Peter William Lockley
INX Europe

Position in Company

President of INX Europe

Other association responsibilities/experiences

Support British Coatings Federation via the UK affiliate.

Member of EuPIA Council.

Chairman of Beverage Can Makers Europe and Metal Packaging Europe associations from 2013-2016



Toon Bossuyt
Boss paints

Position in Company

CEO

Other association responsibilities/experiences

2005 – today IVP (Belgian Association of Paint Manufacturers):
Board member

2012 – 2016 IVP. President of the board

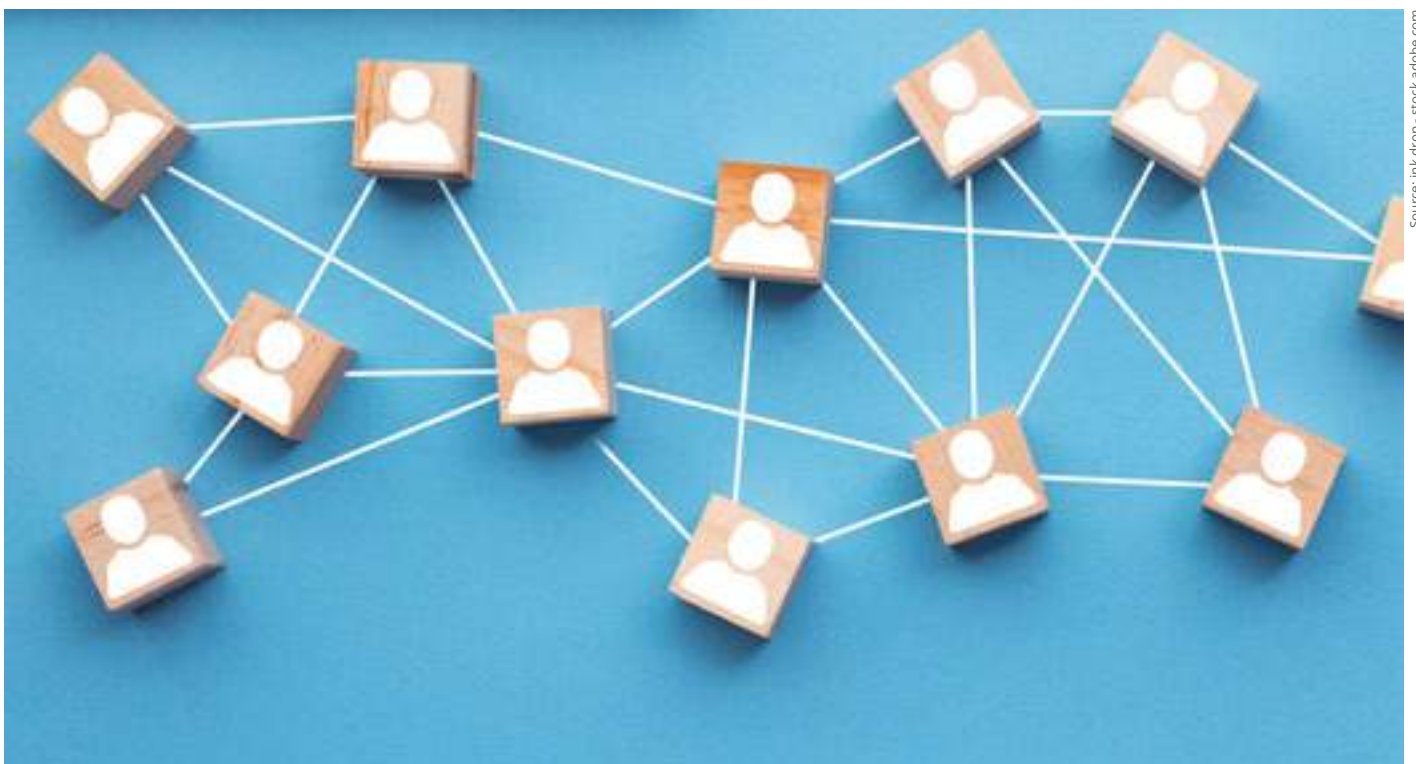
2013 – 2020 CEPE Nomination Committee: member



Jan Piet Van Kesteren
Akzo Nobel

Position in Company

Managing Director Decorative Paints EMEA



Source: iStockphoto.com

EU Sector Group Chair person

Can Coatings



Neil Finley
Henkel, Germany

Coil Coatings



Maxime Hard
Sherwin-Williams, France

Decorative Coatings



Jan van Dongen
AkzoNobel, Netherlands

Marine Coatings



Björn Tveitan
Scandinavia Jotun Coatings, Norway

Powder Coatings



Bjorn Karlsen
Jotun Powder Coatings, Norway

Artists' colours



Ronald Benning
Royal Talens, The Netherlands

Protective Coatings



Malcolm Morris
Sherwin-Williams, United Kingdom

Vehicle refinish



Peter Massen van den Brink
Valspar, The Netherlands

Printing Inks



Heiner Klokke
Hubergroup, Germany

www.cepe.org

www.eupia.org

www.artists-colours.org

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