

CEPE ANNUAL REPORT 2022

CEPE

The voice of paint, printing ink
and artists' colours in Europe



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Join our CEPE Regulatory Quarterly Update Meetings!

To enable members to be up to date on all the latest developments, CEPE has set up "Regulatory Quarterly Update Meetings". These meetings take place 4 times a year. They are designed to provide members with the latest political and regulatory developments at EU level, as well as the priorities of CEPE. They are open to all CEPE members.

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Masthead

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Christel Davidson
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Roald Johannsen
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Dear reader,

The past year will certainly be remembered for the terrible and tragic war in the Ukraine. This was followed by the worst cost-of-living crisis in decades. These events also had a major impact on our industry and businesses with the ongoing raw material inflation as well as surging energy costs.

Meanwhile, Europe continues to move forward with the EU Green Deal agenda. The top priority for CEPE members is the Chemicals Strategy for Sustainability (CSS). While the proposed revision of REACH has been delayed until later in 2023, the European Commission has published several legislative proposals of direct relevance to our sector, such as the proposal to revise the Classification, Labelling and Packaging (CLP) Regulation. The Commission is also advancing the topic of a circular economy, with a proposal to set eco-design requirements for products before they can be placed on the market, and the revision of the Packaging and Packaging Waste Directive aimed at more recycling and circularity.

The current business, economic and regulatory environment prompted the Board to reassess and revisit the vision, mission and values of CEPE. Our purpose is to be a trusted and proactive partner to ensure the sustainability of the paints, coatings, printing inks and artists' colours. We will continue to strive to provide the necessary framework, information and toolbox that allow member companies to navigate the current and future regulatory landscape, and thereby help ensure a sustainable future for our sector and the environment.

As part of striving to be more proactive, we continued our exercise to gather data on substances, and launched two scientific studies on microplastics under the framework of the new CEPE Research Fund. The aim is to support discussions and concerns ahead of possible regulatory action with accurate, scientific and balanced information. On a policy level, CEPE has put forward the concept of the early analysis of alternatives as a pillar of the future regulatory decisions under REACH and which has been endorsed by other trade associations.

Building on these initiatives and successes, CEPE has set up a public affairs group to ensure that the voice of the paints, printing inks and artists' colours industry is heard on key political topics. This group coordinates the communications and advocacy activities of CEPE. Key achievements of the group include the biocides campaign and a series of meetings at the highest level with members of the European Commission.

2022 was also the year we returned to "normal" life after the pandemic and face-to-face meetings resumed. All the colleagues of our National Associations met in Brussels for an EU workshop, and a joint session was organised between the Directors of the National Associations and the Board members. This culminated with the CEPE community at large meeting for its first Annual Conference and General Assembly in Madrid since before the pandemic.

Looking ahead, 2023 will undoubtedly be another year full of many challenges and opportunities for our sector. To be up to date on all these issues we invite you to read the CEPE Signal, attend our quarterly regulatory update meetings and join our working groups.

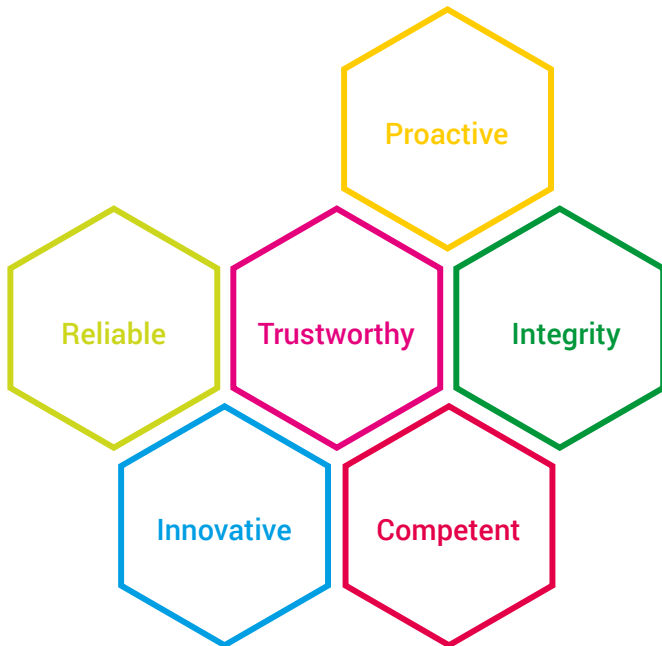
Christel Davidson

Roald Johannsen

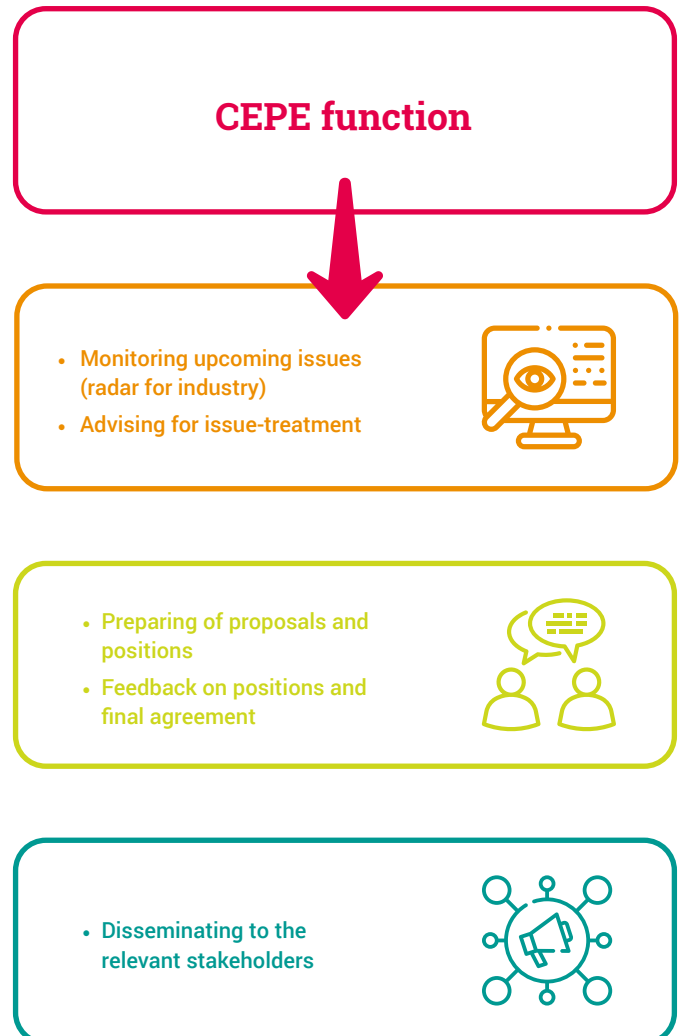
CEPE Mission Statement

- To work with member companies and their value chain to ensure the long-term prosperity of the paints, printing inks and artists' colours sector.
- To advise EU and national institutions to help reach decisions based on accurate and balanced information and sound science.
- To continuously increase the awareness of the paints, printing inks and artists' colours industry and its valuable contribution to sustainability with all stakeholders.
- To provide an organisational structure of committees, working groups and ad-hoc task forces in order to achieve CEPE's vision.
- To foster relationships with other international associations related to the paints, printing inks and artists' colours industry.

The Values of CEPE are



Activities of CEPE



Public Affairs

The environmental ambitions underlying the EU Green Deal will profoundly change the business environment in which companies operate. The zero-pollution pillar of the EU Green Deal and in particular the Chemicals Strategy for Sustainability (see separate article on CSS on pag 15) will heavily impact the chemical industry, with the downstream users of chemicals most affected.

This observation was confirmed by the study of CEFIC:



To date, the work of CEPE has primarily focused on regulatory issues. However, considering the political context with the increasing number of legislative proposals and other initiatives stemming from the EU Green Deal, the need for more advocacy and public affairs has become apparent.

What can we do and how?

As a first step, CEPE transformed the public affairs informal network into a working group, bringing together the public affairs specialists of our membership (national associations and companies). Besides making proposals to the operational board on the public affairs strategy priorities and supporting the work on regulatory issues, the Public Affairs Group (PA Group) also provides communication support to other working groups of CEPE including the coordination of campaigns aimed at raising the profile of the industry vis-à-vis the European institutions and other relevant stakeholders.

What have we achieved?

In 2022, CEPE embarked on a series of high-level meetings. During the French Presidency of the Council of the EU, CEPE was invited to participate in several meetings organised by its French member, FIPEC including meetings with the cabinets of the President of France, the Prime Minister, the Minister for Economic Affairs and the Minister for Environmental Affairs. A meeting with the French Permanent Representation in Brussels also took place.

« Considering the political context with the increasing number of legislative proposals, the need for more advocacy and public affairs has become apparent »

Moreover, CEPE successfully organised two meetings with members of the cabinet of the EU Commissioner for Internal Market, Thierry Breton, the EU Commissioner for the Environment, Virginijus Sinkevičius and the EU Executive Vice-President, Frans Timmermans.

Another highlight of the activities of the PA Group was the campaign #CoatingsNeedPreservative! This one-week campaign which ran from 21 to 25 February 2022 was designed to raise awareness on the effects of EU regulations and review processes which are leading to more preservatives being phased out and to no new products being approved to take their place. In addition to the online campaign, CEPE developed a series of documents (position paper, Frequently Asked Question..) and a dedicated webpage: www.cepe.org/campaign-coatings-need-preservatives/



Source: mpfphotography - stock.adobe.com

On the legislative front, the PA Group supported the efforts of the CEPE Green Deal Task Force sub-group on Circular Economy by drafting and submitting amendments to Members of the European Parliament on the proposal for an Eco-design for a Sustainable Products Regulation (ESPR). The group also produced a general position paper regarding the CSS, a dedicated position paper on the revision of REACH and several documents on microplastics, including a FAQ.

What are the next steps?

During its workshop in December, the PA group developed its work plan for 2023. On the legislative front, the priorities will be to continue defending the interests of our industry as regards REACH, CLP and ESPR, in close cooperation with the regulatory affairs people. The PA group will also work on the non-legislative topics of microplastics and preservatives and develop or support awareness-raising initiatives of other working groups. Finally, the PA Group intends to continue its efforts towards decision-makers and will reach out and engage with all other relevant stakeholders, particularly in the context of the upcoming European parliamentary elections.



Events and

Campaigns

#CoatingsNeedPreservatives



Events

Brush and roller cleaning video



The CEPE Team provides, every quarter, an update on regulatory affairs issues.

- latest developments on all the EU political
- Regulatory developments
- priorities of CEPE
- Updates on: REACH, CLP, Biocides and the EU Green Deal

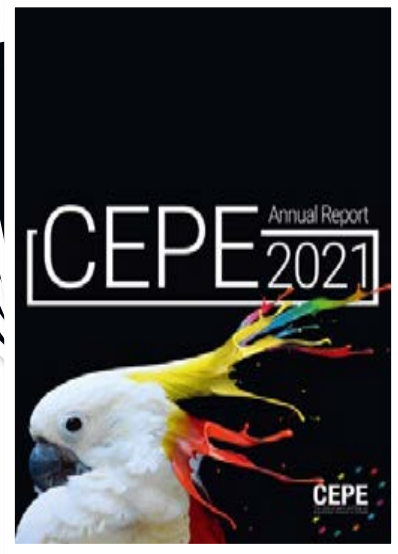
These webinars take place on Fridays morning from 10:00 to 12:30 AM CET.

Communication

CEPE Signal



Information tools



Annual Report

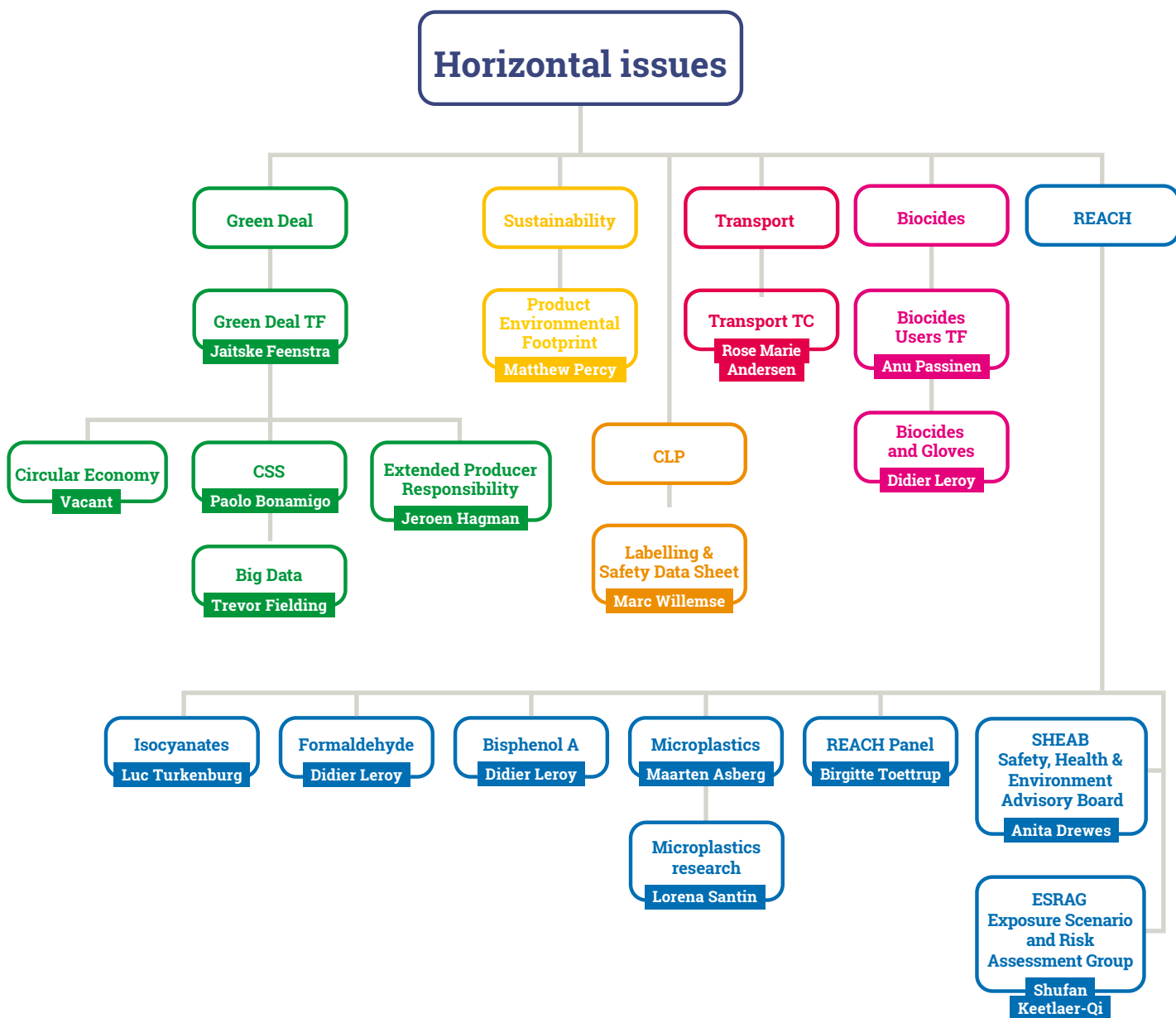
Webinars



Organigramme

Situation as of February 2023





CEPE is member of:



The EU Green Deal



Source: Mairday - stock.adobe.com

The President of the European Commission, Ursula von der Leyen, presented on 11 December 2019 the European Green Deal, a plan to make Europe the first climate-neutral continent by 2050. The Green Deal is the growth strategy to make the EU's economy sustainable and create sustainable industry and transport, without leaving anyone behind. The EU Green Deal is a step towards a more holistic and integrated approach to address climate and environment-related challenges. It also attempts to mainstream environmental policy by bringing together, and improving, several existing policies, initiatives, and funding programmes dedicated to addressing sustainability and climate change.

The diagramme (on the right) highlights the different dimensions of the EU Green Deal. Most relevant to the coatings industry are the dimensions for the "environment", "circular economy" and "food systems" which each contain many different initiatives. The EU Green Deal also recalibrates the EU approach to energy, mobility, climate, biodiversity, and finances.

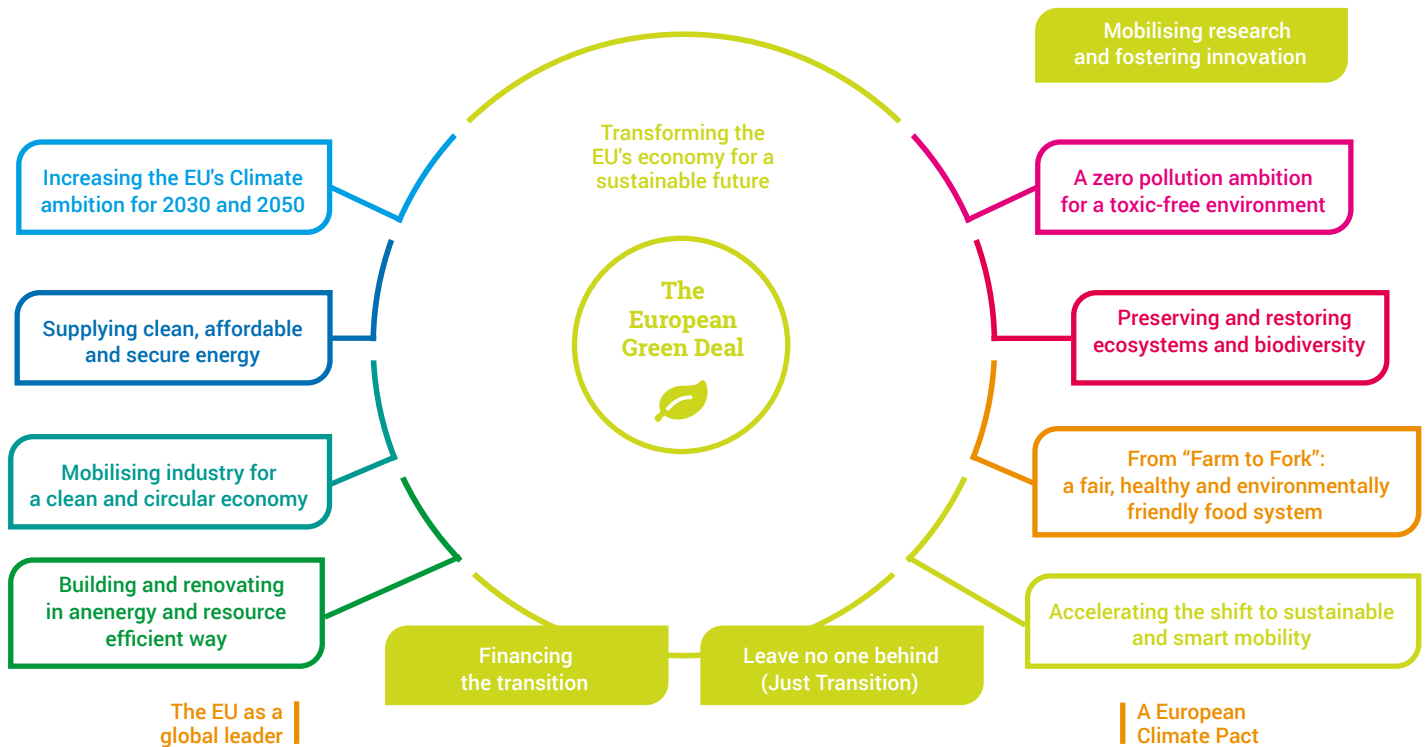
The implementation phase of the EU Green Deal began in 2020 and has continued since. Addressing the different dimensions of the EU Green Deal (e.g. environment, industry, climate, finance), many sub-strategies were presented throughout 2020 (Chemicals Strategy for Sustainability, Circular Economy Action Plan). Most of these sub-strategies again have a bouquet of different initiatives which are put to public consultation. CEPE has en-

gaged in several consultations and monitors many more issues. Members are kept up to date on the latest developments via the CEPE Green Deal Task Force and the CEPE Regulatory Quarterly Update meetings.

Circular Economy Action Plan (CEAP)

As part of the EU Green Deal, the Circular Economy concerns greening industry processes and is therefore of importance to the coatings industry. The CEAP was published in March 2020 and proposes the initiative to create a Sustainable Product Framework and suggests dedicated actions for key value chains and for the handling of waste.

« **The EU Green Deal also recalibrates the EU approach to energy, mobility, climate, biodiversity, and finances** »



Source: European Commission

Progress on the CEAP has been slow with regular delays in the consultation processes and publications of proposals, the most notorious being the proposal on Green Claims. The upcoming "Green Claims proposal" will require companies to substantiate claims they make about the environmental footprint of their products/services by using standard methods for quantifying them. The EC announced in 2022 that the Proposal for Green Claims will be a directive instead of a regulation. The proposal framework can be expected in 2023. One of the revelations that was made in 2022 is that the Green Claims would allow other recognised methods to validate the green claims that a manufacturer makes. This means it is not going to be the PEF method alone, but also other LCA methods like EPDs that can be used to substantiate claims.

The CEAP also seeks to establish a new framework for Eco-design for Sustainable Product Regulation (ESPR) formerly called 'Sustainable Products Initiative' (SPI) framework. The initiative broadens the scope of the current Eco-design directive to other product types with the aim to make products placed on the EU market more sustainable (e.g. durable, reusable, repairable, recyclable and energy-efficient). The initiative also addresses the presence of harmful chemicals in products such as: electronics & ICT equipment, textiles, furniture, steel, cement & chemicals. In the new public consultation on ESPR, the EC plans to prioritise product groups that will be selected for the 1st working plan of ESPR. Paints including vehicle refinishing are one of the product groups that will be potentially covered un-

der the ESPR. Additionally, there is also a horizontal measure introduced under the ESPR that defines sustainability and information requirements for product groups that share the same characteristics.

After contributing to the roadmap consultation in 2020, CEPE responded in 2022 to the public consultation and drafted an additional position paper on the ESPR framework. It is clear for CEPE that for some product categories the greatest sustainability benefits are related to the use phase and eliminating substances for achieving sustainability via performance and durability is critical. Hence a too narrow focus on recyclability or circularity might result in trading-off significant sustainability benefits for a relatively small benefit.

Part of the ESPR framework will contain requirements for a Digital Product Passport (DPP). The passport will contain information about the composition of goods on the European market to help boost their chances of being reused and recycled. While the DPP has its merits, CEPE argues that only the most essential information should be provided to protect confidential business information and again to avoid administrative burdens from constant updates.

CEPE has drafted amendments and has shared them with the relevant Members of the European Parliament. The EC published the proposal for a regulation on the Packaging and Package Waste Regulation

(PPWR). The regulation aims to harmonise different national legislation on packaging requirements to achieve a level-playing field. The regulation also aims to introduce recycling targets for 2030, and even more ambitious levels for 2040. The PPWR proposal will be further debated in the European Parliament and Council and should be adopted by the end of 2023.

Zero pollution for a toxic-free environment

- Chemical Strategy for Sustainability
 - Safe and Sustainable by Design

The Chemical Strategy for Sustainability (CSS) is undoubtedly the strategy that will impact CEPE members most. See separate article on CSS on page 15. One initiative not covered in the article is the initiative for Safe and Sustainable by Design (SSbD). Under this initiative, the EC will develop criteria future chemicals have to fulfil with before being marketed. A working definition notes that the initiative shall focus on providing a function (or service), while avoiding volumes and chemical properties that may be harmful to human health or the environment (in particular (eco-)toxic, persistent, bio-accumulative or mobile).

While the burden of the initiative can be expected not to be with downstream users of chemicals, but chemical manufactures, the initiative will likely extend the design and testing phase and may reduce substance availability.

CEPE commented on the initiative during the public consultation in 2022 on the framework proposal of SSbD and highlighted critical elements to be considered conceptually to make SSbD useful. The next step of the SSbD is to present case study criteria for three different chemicals (Plasticizers (non-phthalate), Flame retardants, and Surfactants). The EC plans to present a case study framework for these three selected chemical product groups for specific application in 2023. For now, the SSbD is a voluntary framework that aims to boost research and innovation in the upstream chemicals.

CEPE will continue to engage during upcoming EC workshops on SSbD criteria in 2023.

CEPE is currently engaged with CEFIC alongside other associations to explore possible pathways to monitor and evaluate the SSbD framework.

- Zero pollution action plan

In May 2021, the EC adopted the zero-pollution action plan which seeks to combat pollution to air, water and soil. The action plan sets out a vision for 2050 with targets for 2030 (i.a reduce by 50% plastic litter at sea and by 30% microplastics released into the environment). Among the actions, there are several issues that CEPE monitors and is ready to engage in if necessary: e.g. the revision of the industrial emissions directive, improving indoor air quality (2023), and the fitness check of the Environmental Liability Directive (2023), including proposals for the polluter pays principle (2024).

In relation to the action plan, the EC also published in November 2021 a soil strategy with a vision for 2050 and actions by 2030. One expected change from this strategy is that, in future, soil quality will be considered in the EU risk assessments of chemicals.

Financing the EU Green Deal

Achieving a green future requires substantial investments. The EC has pledged to mobilise at least €1 trillion in sustainable investments over the next decade. In addition, the EC seeks to mobilise public and private investments. To direct funds to green investments, the EC has introduced in 2020 the EU Taxonomy Regulation which seeks to classify green investments. The Taxonomy Regulation concerns the finance market but may be harmful to the coatings industry. It may cause possible reputational damage (if products were not considered green) and possibly hamper capital inflow from finance products. 

« The Chemical Strategy for Sustainability is undoubtedly the strategy that will impact CEPE members most »





Source: Naiyana - stock.adobe.com

The Chemical Strategy for Sustainability

The issue

On October 14, 2020, the European Commission (EC) published its Chemical Strategy for Sustainability (CSS). This is an unprecedented revolution for the chemical industry as it shifts the regulatory approach from a risk-based approach to a more hazard-based approach.

The CSS stems from the overarching Green Deal approach and follows a decade of push for a non-toxic environment. In line with the objectives of the EU Green Deal, a sustainable chemical future will be a future free of chemicals of highest concern.

Of all the initiatives of the EU Green Deal, the CSS is the one that will have the greatest impact on the chemical industry and deserves special attention.

The EU regulatory and political environment

REACH is considered the most comprehensive chemical regulation in the world and there is general acceptance that chemicals play an essential role in our society. However, it has been acknowledged that REACH fails at eliminating the most harmful chemicals sufficiently rapidly and that it is too burdensome. The European Parliament (EP) and the Council have given a mandate to the EC to change this, with the Environment Directorate of the EC (DG ENV) in the lead. This is a political reality that we cannot change. On the contrary, we must accept that we will have to phase out, to some extent, the most harmful chemicals from our products. Innovation will be key. In cases where substitution will not be possible in the short to medium term, derogations will be needed.

What does it mean in practical terms?

Chemicals of highest concern? In addition to known undesired hazard that already lead to regulatory action under REACH (CMR cat 1, PBT and vPvB) the EC intends to hit hard many other hazards. It will start adding new classes under CLP for endocrine disruptors (EDs) and for both categories: cat 1 and cat 2 (suspected), PBT, vPvB, PMT, vPvM without coordinating with the United Nations Globally Harmonised System (UN-GHS) and it will then test the possibility of adding immunotoxicants, neurotoxicants, hazardous to terrestrial organisms via the UN. In addition, the EC also intends to tackle respiratory sensitisers and STOT RE Cat 1 (Specific Target Organ Toxicity). Also, we are seeing an increasing trend to also address skin sensitisers but these are expected to be addressed by means of the classical restriction routes.

Revisions of the CLP and REACH Regulations are expected. The proposal to revise the CLP Regulation has been published and should be adopted in 2023, whereas the proposal to revise the REACH Regulation is expected after the summer 2023. One of the main threats is to make greater use of the Generic Risk Management Approach (GRA), which is in fact a hazard approach. The GRA is not a new concept. It exists under REACH (see Annex XVII, entries 28-30): it consists in a simple ban for consumers for CMR cat 1 for substances and mixtures above a generic threshold. The EC now wants to have a wider mandate and to apply this GRA for many more hazard classes, for both consumers and professionals, and for articles also. It remains to be seen if generic thresholds will remain, or, if the mere presence of one molecule will be deemed unacceptable.

The approach is therefore to ban in a first instance and to then consider possibilities for derogations. However, derogations might only be possible for essential uses. The essential use concept (EUC) was first put on the table at the end of 2020 and triggered a lot of reactions, including from CEPE. Some NGOs would like an interpretation whereby, anything related to cosmetics, decoration, leisure or toys are by default non-essential for society. Concretely, this would imply that no derogation for a substance would be possible, should this interpretation be applied in such a simplistic way. The EUC is a difficult issue and, if implemented, raises the question of who should be held accountable to judge what is essential and what is not. Who would assess if a given pigment used in Artists' Colours is non-essential and therefore automatically banned? Who would assess if preventing human creativity is acceptable or not? At the time of writing, the EC is still discussing internally but intends to use this concept in several legislations (including food contact) and will probably publish details on its applicability in a guidance document rather than in an official text.

The CSS also wants to address uncertainties linked to possible unintentional exposure to chemicals. It is true that under the current REACH rules, safety assessments are done on an individual substance basis. It is hard to predict if and how people or the environment could be exposed to different chemicals having the same mode of action at the same time. CEPE is of the opinion that the current rules already contain sufficient safety margins to cover reasonable worst-case exposures. However, these safety margins are not deemed sufficient anymore by some Member States who want to add a MAF (Mixture Assessment Factor). If a MAF of 10 were to be applied in addition to existing safety factors, this would mean that the unintentional exposure to combined chemicals could pose a risk 10 times higher than it is today, which is unreasonable for most chemicals. In order to address the uncertainties, CEPE calls on deci-



sion-makers to focus on what matters most, i.e. on those chemicals that are most likely present in our environment for possible co-exposures. A blanket MAF applied to all chemicals and all uses of chemicals would be very detrimental and a too simplistic way to cover a complex situation. At the time of writing, it is likely that a blanket MAF of 5 will be applied to high tonnage chemicals (probably chemicals placed on the EU market above 1000 MT per year – this would affect many substances used in our industry) to both Human Health and Environmental risk assessments.

The EC is also developing Key Performance Indicators (KPIs) to measure the success of the transition to a less hazardous environment. Once again, our industry needs to be innovative to develop criteria that do not simply measure the tonnage reduction of hazardous chemicals, but criteria that encompass other Green Deal objectives such as sustainability. Replacing a technology by another one that has only half its lifetime is against the sustainable principles of reducing CO₂ emissions, use of raw materials or waste generation.

What can we do and how?

The EC has now identified over 85 CSS actions. It has recruited staff to face the ever-increasing number of activities and has outsourced many actions to private consulting firms. The timelines are very ambitious, giving industry limited time to react.

Concretely, the difficult concepts such as GRA, EUC or MAF will be implemented. The role of CEPE and its members is to 'control damage', analyse and communicate the impact on our industry to deci-





Source: Surasak - stock.adobe.com

CEPE has created a dedicated CSS group under the CEPE Green Deal TF. This group also ensures that the CEPE Board, the National Association Directors and the CEPE SHEAB group have the possibility to comment. It started to meet once per month early 2021, but this rate has increased to every second week to try to keep up with the pace of actions. At the end of 2021 a subgroup of the CSS group was also set up to be even more reactive and to support the CEPE staff liaising with the EC.

CEPE is calling for the EC to not rush into a blanket GRA and to, in a first instance, gather information on uses, exposures and alternatives, before deciding which regulatory route to choose (under REACH and/or under other legislation). Only an informed decision-making process can prevent unexpected consequences. To date, we have been successful in bringing at the highest level of both DUCC and CEFIC the need to discuss an early analysis of alternatives. The CEPE CSS group has developed a decision tree for this, which postpones to the last stage a possible essential use concept. The next step will be to discuss how to put in place a robust system.

The ongoing discussions and developments highlight that industry as a whole will have to provide more information than it currently does, including the supply chains.

What are the remaining steps?


Short term. Get involved!

The window of opportunity to influence the EC is almost over. The avalanche of inception impact assessments, public consultations, targeted consultations, impact assessments and workshops for each of the important CSS topics is over: the EC has finalised its work and is in the final stages of drafting the legal text. The CLP text has been published: both the delegated act (new hazard classes) and the Ordinary Legislative Procedure (for the other topics of CLP requiring clarification). The REACH text is expected after the summer of 2023. This year will still be very busy with the legislative proposals submitted to the European Parliament and Council.

Long term. Data!

With the expected entry into force of the amended CLP and REACH regulation around 2023-2024, the subsequent three decades will be marked by increasing pressure on many substances: many of which are critical and used in our industry. Therefore, our industry needs to:

- Be prepared to innovate by substituting the most harmful chemicals, where possible and
- If more time is needed solid quantitative data will be necessary to support derogations.

Therefore, as a sector our priority should be to focus on obtaining quantitative data, as qualitative data is deemed insufficient by decision-makers. The CSS group and other CEPE groups are also discussing the need for 'big data' for the industry. This information will be essential to allow CEPE to advocate and to defend our industry and thereby obtain derogations. To be successful though, companies need to be able to deliver the relevant information and to ensure confidentiality. The information will be managed by external parties. The CSS group is now in the phase of identifying what type of information will be needed, for what priority substances and may differentiate such data by the type of question to expect in the future. 

sion-makers to prevent simplistic approaches to these concepts. To be successful, we need to offer innovative and reasonable solutions that deviate from former positions such as 'if it is safe for use then leave it alone'.

What have we achieved?

As stated above the EC has hired external contractors to address the many ongoing actions. For each of the actions, inception impact assessments followed by impact assessments, public consultations, targeted consultations and workshops are organised. Discussions also take place at CARACAL level and in sub-Caracal groups and also within many industry associations. Calls are organised, documents and position papers circulated. Given the limited resources available it is impossible to follow all the developments in detail and we have to prioritise and focus on the most important impactors, amongst which, those identified above.

« To be successful though, companies need to be able to deliver the relevant information and to ensure confidentiality »

CEPE Sustainability Tools

CEPE started working on sustainability issues in 2010 and published a Sustainability Charter in September 2012. The charter described the policy the coatings and printing industry would follow in the coming years, encouraging 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 (see diagramme below).

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 a 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 its 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 Eco footprint 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:



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 LCA by using the assumptions from the already published LCA studies 'from cradle-to-grave' (what happens after the gate of the factory)

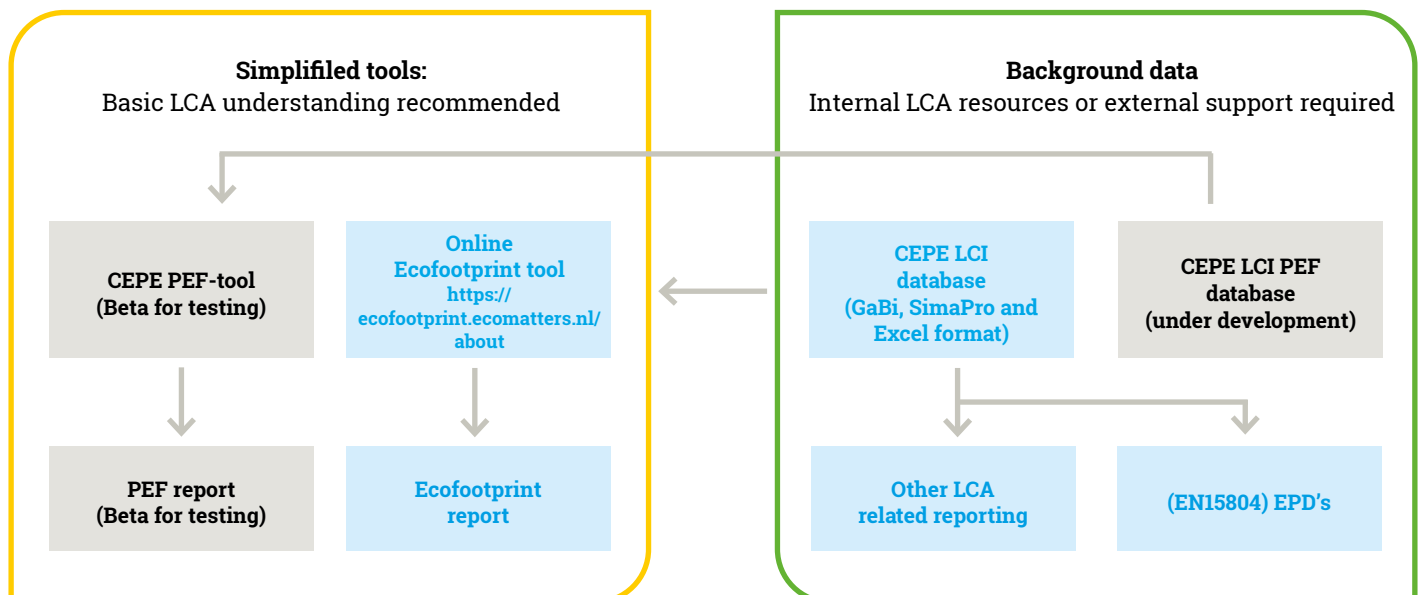
To date, some 50 CEPE member companies have used the CEPE LCI data and over 250 individual users have used the Ecofootprint tool. An update to the current version of the CEPE LCI database is foreseen. Members using the current version of the database will be informed accordingly and invited to recalculate their results.

Product Environmental Footprint (PEF)

PEF is part of the Single Market for Green Products Initiative launched by the European Commission (EC). 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 moved 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.

What does CEPE offer you?






Source: Tierney - stockadobe.com

The beta test version of the PEF tool is done and can be used, but the PEF methodology and EF datasets are being refined, so the results are not finalised. This can be expected in 2023 once the next steps with PEF is finalized by the EC. The new release would include a couple of elements that were missing such as the inclusion of the toxicity impact categories, updated raw material datasets and the creation of performance classes.

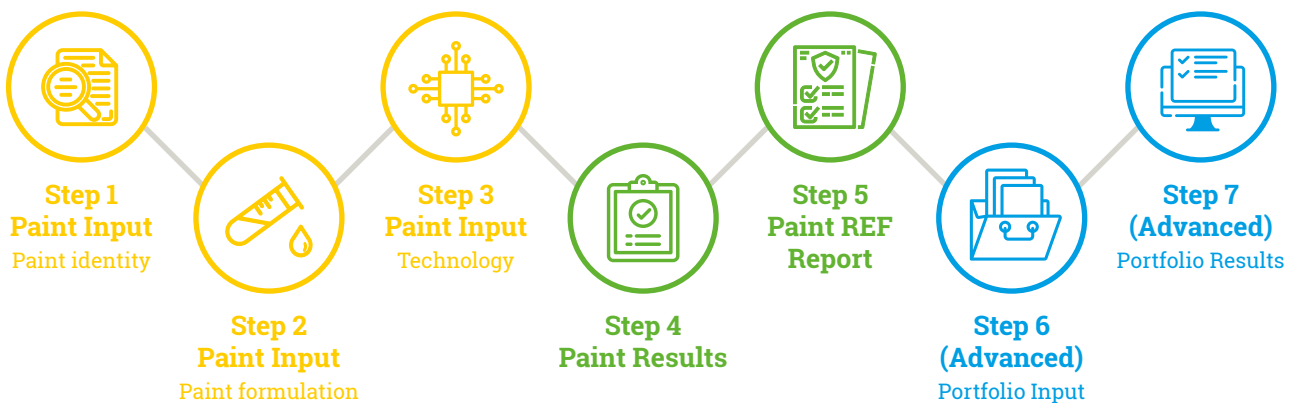
The CEPE PEF tool allows the user to follow a three-step data insertion process that leads to results for a single product. An overview of the steps is given below (see diagramme below):

- 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/her to compare the different products in terms of PEF score and CO₂ emissions.

It is also required under the Recommendation on the use of Environmental Footprint methods for the PEF users to get their PEF studies 3rd party certified. As a part of the ongoing PEF project, the CEPE PEF Technical Secretariat completed the pilot verification study to streamline the PEF study verification process, whilst identifying the methodological and technical gaps. 

Three-step data insertion process



REACH

The most ambitious piece of European legislation implemented over 15 years' ago is now undergoing revision under the Green Deal Chemical Strategy for Sustainability (CSS). As the drafting of 'REACH 2.0' is underway, the existing legislation continues to have major impacts on our sectors' activities.

The issue

REACH stands for: Registration, Evaluation, Authorisation of Chemical substances. Although the title does not incorporate it, the Restriction on placing on the market and use of chemical substances also falls under REACH's remit. Several current and upcoming restrictions are already having or are going to have an impact on the use of chemical substances in paints, coatings and printing inks.

The EU political environment

REACH is now widely recognised as the most successful and comprehensive chemicals legislation worldwide, with many non-EU countries using the basic framework for their own purposes, so that we now have for example K-REACH (S. Korea), UK REACH and KKDIK ('TURKREACH'). Also, many countries have adopted and adapted the different REACH elements into their own existing chemicals legislation. However, the task of registering, evaluating and then taking appropriate regulatory action on over 26.000 substances (the European Chemicals Agency (ECHA) database currently holds 26.759 records at time of writing) is understandably a very time and resource-consuming process, and there is now considerable pressure on the authorities to accelerate the pro-

cedures. One of the key objectives of the CSS is to adapt the REACH legislation accordingly. However, it of course remains essential that decisions taken are based on sound scientific principles, data and information, and not rushed through to satisfy political agendas. At the same time, our knowledge of chemical substances, and their hazards, has advanced tremendously in recent years, resulting in an ever-increasing list of chemicals to take action on, due to concerns over their impact on human health and / or the environment. So it is in this context that the authorities are working on revising the REACH legislation to be fit for purpose for the next generation.

identify substances of possible concern, and to take the subsequent decisions on regulatory action, where warranted. A new 'Restrictions Roadmap' document has now been introduced, to cover the Restriction activities for the coming years, until the revised REACH legislation takes effect. We are now seeing an increase in the tendency for the authorities to propose Restrictions for groups of substances, and for REACH actions to be proceeding in parallel with Classification, Labelling and Packaging (CLP) harmonised classification proposals, rather than the more traditional and logical approach of following in sequence. Both of these activities are already causing considerable disruption and confusion out in the market. In addition, the overall tendency for the authorities to take a 'hazard-based' and ultra-precautionary approach to decision-making regarding chemicals legislation, rather than remain within the existing 'risk-based' framework, is of very great concern. These approaches are becoming even more pop-

« REACH is now widely recognised as the most successful and comprehensive chemicals legislation worldwide »

cedures. One of the key objectives of the CSS is to adapt the REACH legislation accordingly. However, it of course remains essential that decisions taken are based on sound scientific principles, data and information, and not rushed through to satisfy political agendas. At the same time, our knowledge of chemical substances, and their hazards, has advanced tremendously in recent years, resulting in an ever-increasing list of chemicals to take action on, due to concerns over their impact on human health and / or the environment. So it is in this context that the authorities are working on revising the REACH legislation to be fit for purpose for the next generation.

In the meantime, there is already a greater sense of urgency from the authorities and from ECHA to complete the existing evaluations, to



« The ECHA database currently holds records on over 26.000 substances »

ular under the EC and ECHA's guidance, as the EU strives to reach its ultimate objective of a 'toxic-free' and 'safe and sustainable' chemicals environment.

What can we do and how?

The core activity for CEPE is the continuous close monitoring of any activities on chemicals substances that may have an impact on members' products. This includes tracking the path of key substances through the REACH process, providing information on volumes and use scenarios, and raising concerns when it appears that regulatory action could have a significant impact on one or more of the paint, coatings, printing inks

and artists' colours sectors. So there is both an information aspect to our work as well as an advocacy aspect (defending the use of key substances where possible), and raising the awareness of substance use to encourage a pragmatic approach to regulating them.

Most of this effort is focused on current and proposed Restrictions that emerge from the evaluation procedure, as Restrictions on certain key substances used by our sectors are already in place. In many cases a dedicated Task Force has been set up for the CEPE community to share information and to discuss and agree upon a CEPE position and approach to a Restriction. This is the case for di-isocyanates (used in 2-Component PU coatings), formaldehyde (affecting curing agents and biocides), bisphenol A (epoxy coatings) and microplastics (main area of current concern is decorative paints, please see separate article on page 38. All of these have seen developments over the course of 2022, especially di-isocyanates, where the mandatory training requirement deadline of August 2023 has necessitated considerable activity in putting together appropriate training content and making this available on the dedicated web-platform. The Restriction on bisphenols is still in the drafting and discussion stage, with the latest proposal from the German authorities published in October 2022.



« The Candidate List of Substances of Very High Concern continues to grow. There are currently 233 substances on the list »

In addition to restriction activities on substances, the Candidate List of Substances of Very High Concern (SVHCs) continues to grow (there are currently 233 substances on the list). These 'most harmful' substances are destined for possible Authorisation, requiring users to apply for permission if they want to continue to use the substance. Additions to the list are usually made twice a year by the authorities, after extensive discussion and decisions taken within the appropriate REACH-related committees. The 5 substances that were added during the course of 2022 were believed to be of limited interest. However, there were several key substances included in the 9 substances added in January 2023, in particular the addition of melamine.

Although the future of the Authorisation procedure remains uncertain in the new revision of REACH, the listing of a substance as an SVHC

effectively puts considerable pressure on our sector to substitute the substance where possible, or to prepare a comprehensive set of information to demonstrate why we need to continue using the substance.

Other REACH topics that require our attention include the discussions relating to the future registration and evaluation of polymers / groups of polymers, and the need for our members to comply with the requirements relating to supply chain communication, proving safe use, information sharing and reporting to the authorities. The latter includes the revision to REACH Annex II (the grace period ended on 31st December 2022) relating to changes to Safety Data Sheets (SDS), and the very regular changes to Poison Centre Notification requirements. The REF-series (REACH-EN-FORCE) of planned enforcement activities are also monitored closely, as these can sometimes impact member activities.



What have we achieved?

There have been extensive activities surrounding the di-isocyanates Restriction, especially preparing the content for the training programme. CEPE held a joint webinar with the Association of the European Adhesive & Sealant Industry FEICA and the European Federation for Construction Chemicals (EFCC) in October 2022 to guide members and their customers to the correct modules to follow, and explain how the training process works, to ensure compliance with the Restriction. This is a whole new approach for our sector so the experience will provide a good basis for possible future similar requirements. (See separate article on page 30 to review the considerable activities on the microplastics Restriction).

The basis for proving safe use of substances is the CEPE Use Maps, specifically the SWED-SUMI approach that was developed several years ago. The supporting documentation is now requiring some considerable maintenance in light of recent discussions, as well as requests from ECHA and Cefic contacts. The work has been identified however it will take time to address and fix all of the issues. At the same time CEPE members have provided considerable support to a new Supply Chain Communications Task Force set-up by the Downstream Users of Chemicals Co-ordination group (DUCC) which is engaging both up and down the supply chain on the topics of digital transfer of information and minimum information requirements. This is replacing the work that the Exchange Network on Exposure Scenarios (ENES) was focused on previously (ENES activity was suspended due to the withdrawal of ECHA support for the activity 3 years ago). During the course of 2022, the two Labelling and Safety Data Sheets groups (CEPE + EuPIA) also issued new guidelines for SDS creation and a new SWED-SUMI for UV inks.

What are the remaining steps?

The current Microplastics Restriction and the proposed Restriction on BPA will continue to be important topics for the CEPE community in 2023, along with other proposed Restriction activities that are listed in the Restrictions Roadmap document. The proposed Restriction on Polyfluoroalkyl Substances (PFAS) is of particular concern, as this is likely to include PTFE waxes (used by multiple CEPE sectors) and fluoropolymers (a highly-durable technology used in outdoor protective coatings). In addition, classifying melamine as an SVHC will have considerable ramifications for several CEPE sectors, including the intumescent coatings and those sectors relying on melamine-formaldehyde curing resins for stoving systems (e.g. can, coil, wood coatings). Other SVHC classifications are in the pipeline and will also undoubtedly have



Source: nitroworld - stock.adobe.com

an impact. The further development of the requirements for registering polymers under REACH is going to need careful monitoring and good engagement with the polymer suppliers, to ensure that the information provided is correct and manageable.

The REACH legislation is recognised as a comprehensive and successful framework for legislation chemicals. However our fear is that the challenges resulting from the revision of this core regulatory pillar could lead to extremely complex issues, bans on key substances and unworkable scenarios, ultimately impacting on the availability of substances and mixtures 'in the toolbox' for our members to use to formulate their products. ◀

« The current Microplastics Restriction and the proposed Restriction on BPA will continue to be important topics for the CEPE community in 2023 »



Substances advocacy

CEPE supports several key substances which are under regulatory pressure. The year 2022 ended with some good news regarding TiO_2 , some clarity regarding BPA (and other bisphenols) and some bad news regarding melamine.

Titanium Dioxide (TiO_2)

The issue

It is useful to remember the “story” around this topic as it is a learning for both Industry and the Authorities.

In 2016 the French authorities proposed a classification for carcinogen by inhalation category 1 (the worst), for all forms of TiO_2 , 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 it is 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 Substance of Very High Concern (SVHC) under REACH, which is the first step towards a phaseout in Europe.

TiO_2 has multiple applications. Our industry is the number one user in terms of quantity, but TiO_2 also finds applications in plastics, paper, rub-

ber, ceramic, toys, toothpaste, cosmetics (also in sun cream to protect against skin cancer), food additives, etc.

The EU regulatory and political environment

This dossier was a CLP dossier (Classification, Labelling and Packaging of substances and mixtures Regulation (EC) N° 1272/2008). The classification of a substance is based solely 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 but never after. Concretely, this implies that a substance can enter RAC with a



a couple were clearly standing against the classification. All the others asked the EC to try to reduce the undesired impact, while still supporting the fact that CLP was the best regulatory route to address the concern.

« The European Court of Justice concluded that the European Commission had made a mistake and hence annulled the classification of TiO₂ »

What was the concern? This is the first time that an inert dust was proposed for classification as carcinogenic. Indeed, TiO₂ is an inert solid with poor solubility and which 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 triggering 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 from 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, while others took a conservative approach.

What have we achieved?

We have obtained that liquid mixtures be exempted from classification and the term 'carcinogenic' not appear anywhere. The classification only applies to powder forms (when they fall under the criteria of 'aerodynamic diameter' - see below for more explanations), as explained in the classification entry in its Note 10. This certainly helps the decorative sector which sells products to consumers.

Indeed, it is very difficult to explain to the public the difference between hazard and risk. 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, he would be at risk of developing cancer, which is totally wrong. Unfortunately, CLP does not allow that differentiation which would have caused misunderstandings and miscommunication.

certain proposal and come out with a totally different outcome, which is no longer open to public consultation. The process is quite unpredictable and experience shows that most substances come out with a worse classification.

What did we do and how?

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

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 (EC) and by explaining to them the nature of the problem and the impact in case no solution would be found. This led to the decision of the EC to reduce the impact by derogating liquids. Despite all our subsequent efforts, the position of the EC did not change further. Member States can of course challenge the EC position but only

In order to address its remaining concern when spraying paints, the EC has proposed a new EUH 211 sentence: ‘Warning. Hazardous droplets may be formed when sprayed’. This sentence must appear on the labels of liquid paints if the TiO₂ supplied is classified.

Latest developments

TiO₂ is now officially classified in the 14th Adaptation to Technical Progress (ATP) to CLP. The deadline for complying was 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. We have also clarified how TiO₂ should be mentioned in Safety Data Sheets given its particular status. It should be noted that the waste remains an unclarified issue as the EC did not find a way to close it before adopting the classification. A derogation for the EU Eco-label has been granted (together with the organic coating TMP). At the time of writing, a derogation is still under evaluation for the Toy industry.

For powder coatings efforts focused on understanding if these coatings would fall under the definition of ‘aerodynamic diameter’. The most relevant method of the ‘rotating drum’ was applied to numerous representative powder coatings. According to this methodology, powder coatings do not need to be classified and only the EUH 212 sentence applies.

During 2021, manufacturers of TiO₂ decided to not classify their material, based on the same methodology. However, they did recommend applying the EUH 212 sentence.

A few court cases were filed with the objective to annul the classification. The European Court of Justice (ECJ) published its judgment in November 2022 (Press Release 190/22 of 23 November 2022). The ECJ concluded that the EC had made a mistake and hence annulled the classification of TiO₂, which should oblige the EC to modify the

14th ATP to CLP. At the time of writing, we are waiting to see if the EC will appeal.

The ECJ ruling is based on two facts (extract from the Press Release) “First, the Commission made a manifest error in its assessment of the reliability and acceptability of the study on which the classification was based and, second, it infringed the criterion according to which that classification can relate only to a substance that has the intrinsic property to cause cancer”. The second fact is very important for other Poorly Soluble particles of low Solubility (PSLTs), such as carbon black or iron oxide. Indeed, with this the ECJ clarified the intention of CLP for ‘intrinsic toxicity’, hence a ‘dust effect’ is not deemed to be intrinsic.

Bisphenol A (BPA) and related bisphenols

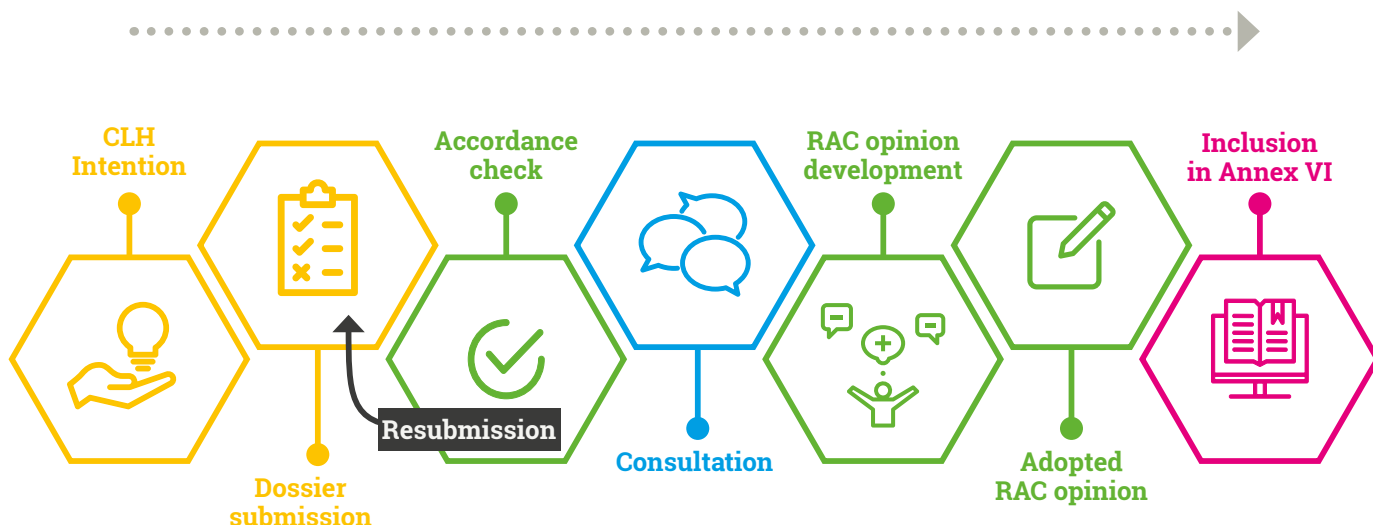
The issue

BPA has been under heavy pressure for many years due to its hazards, including endocrine properties. Currently, most BPA based technologies used in our industry (epoxy coatings) have not been restricted due to the low residual content in resins. They are largely used in applications such as construction, automotive, including powder coatings. The identification of a substance as endocrine disruptor (Category 1) triggers a lot of regulatory activities and a push towards its ultimate elimination in Europe.

What is new?

For the past two years we have been expecting the German Authorities to submit an additional regulatory proposal restricting the use of BPA and related bisphenols (the B, F, S and AF are directly concerned), hence proposing a group approach. This restriction is based

Steps of the CLH process



■ Dossier submitter ■ ECHA / RAC ■ Parties concerned, including Member States ■ European Commission

« BPA has been under heavy pressure for many years due to its hazards, including endocrine properties »

on concern for the environment (endocrine effects on environment without a threshold). For other bisphenols that will demonstrate similar concerns a direct link between their classification and a restriction is envisaged. In October 2021 the restriction proposal was submitted to ECHA and the dossier has been accepted.

The restriction covers many different uses where the dossier submitter analysed the potential emissions to the environment from cradle to grave and proposed the following:

- Shall not be placed on the market in mixtures and articles in a concentration equal to or greater than 10 ppm
- This shall not apply to mixtures and articles where the bisphenols listed in Annex X are either covalently bound to any type of matrix (i.e. via functioning as a cross-linker) or are used as intermediates in the manufacture of polymers, and for which;
- Contact to aqueous media in any form (i.e. also cleaning) can be excluded during their reasonable and foreseeable use throughout their service life or;
- The migration limit in the respective mixtures and articles does not exceed 0.04 mg/L over the entire service life. Conditions for migration testing are described in Annex Z below;
- Outdoor epoxies are exposed to weathering and the determination of a migration during service life is not easy. However, specific derogations are provided including for epoxy resins;
- Concentration limit 65 ppm for the placing on the market of articles manufactured with solid and semi-solid epoxy resins;
- Concentration limit of 1 ppm for epoxy resin mixtures intended for consumer uses.

What are the next steps?

The analysis of the CEPE BPA TF is that, although the text is not entirely clear and is sometimes confusing as regards the scope for substances, mixtures and articles, it should be nonetheless manageable. The TF has therefore decided not to provide comments at this point in time. The discussions between Member States and the other developments regarding this restriction will be followed closely.

Melamine

The issue

Melamine is used in melamine-formaldehyde resins in several industrial coatings such as wood or automotive and is also used as such in intumescent coatings as blowing agent.




Source: pressmaster-stock.adobe.com

The issue is linked to the observation that this substance is present in the environment (surface waters) at relevant levels and this can only be due to human activities, as melamine is not present in nature. The difficulty is to identify the relevant sources of contamination. As for BPA, it could be due to the release during service life, hence the German Authorities have not only requested data but are also putting pressure through regulatory action.

What is new?

At the end of 2022 melamine was classified by the Member State Committee of ECHA as SVHC (Substance of Very High Concern) due to its PMT properties (Persistent, Mobile and Toxic). This should be the first PMT substance to be classified as such under the revised CLP Regulation (see separate article on page 28) and this identification signals more regulatory pressure to come.

What is next?

CEPE does not have a dedicated melamine group. The main group that could be impacted are the intumescent coatings and they have been kept in the loop. CEPE will also follow-up closely in the future on how the melamine formaldehyde resins could potentially be affected, but data on service life degradation is lacking at this stage. 



Microplastics

The issue

Increasingly, studies are reporting on the presence of microplastics in the marine sediment (starting with the Baltic and the North seas) resulting in an escalation of the issue to the political level and forcing the European Commission (EC) to act. Microplastics must be differentiated from the problem of 'plastic soups'. However, nowadays the presence of plastics in the sea is perceived as a sufficiently severe problem to prompt 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 the marine sediments of our neighbouring seas. The second source is the washing of textiles which is due to the insufficient number of systems in place to collect these residues as well as insufficient sediment basins and sewage treatment plants.

The EC requested the European Chemicals Agency (ECHA) to propose a restriction on the placing on the market of 'primary microplastics' which somehow impacts our sector as the definition of primary microplastics i.e. everything that is not liquid or gas is solid – covers some of our products. In this framework, ECHA considers water based dispersions to be included while emulsions are considered liquid in liquid and thus are excluded. However, for water-based dispersions, an internal discussion is still ongoing on the exact scope of the definition.

The EU regulatory and political environment

Primary microplastics

This is a REACH dossier, despite doubts having been raised as to whether non-hazardous inert polymers can be tackled by this Regulation. The proposal of ECHA has been to tackle this issue under the REACH restriction route. Due to the difficulty of regulating the wear and tear of articles, this restriction focuses on primary microplastics i.e. 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 proposal for the restriction is based on the precautionary principle. Indeed, to date, no harm has been demonstrated as a result of 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.

Our industry is only a minor releaser of primary microplastics. Yet, we were not able to get our sector entirely out of the scope of the restriction, resulting in some additional administrative burden of information and reporting. In general, the approach of ECHA to such problems is to restrict all uses, then derogate some uses, instead of focusing only on the most relevant releases.

Secondary microplastics

The EC has expressed its intention to also look into the issue of wear and tear of articles leading to environmental contamination. A first workshop was organised in September 2021 during which the EC explained that it would primarily focus on tyres, pellets and textiles and announced its intention to propose a regulatory action at the end of 2022. However, it should be noted that paints are regularly mentioned. At the time of writing, the EC had not yet taken any specific action as regards paints.

What can we do and how?

Primary microplastics

CEPE is active on this issue since 2016. We immediately set up a dedicated expert group followed by an advocacy group, in order to provide data to the regulators and to try to avoid, and if not possible, minimise, the impact on our sector.

The first sets of information CEPE provided to the consultants working on behalf of the EC 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 tap, the remaining water-based paint present on the brush or roller. CEPE has issued a good practice guide to prevent this happening in the future and the VVVF, the Dutch Association for Paint and Ink Producers, produced a video to promote the correct disposal and CEPE is actively promoting it amongst the relevant stakeholders. While CEPE was in contact with the EC, National Associations were liaising with their ministries. CEPE also joined other industry associations to align views and participated in the ECHA Committee for Risk Assessment (RAC) and the Socio-Economic Analysis Committee (SEAC) discussions. To date, the following steps have been:

- November 2017 - ECHA received a request from the EC to prepare a restriction proposal
- March to May 2018 - a 'call for evidence' took place followed by a workshop
- January 2019 - a proposal for a restriction was published followed by an update in March
- March to September 2019 - public consultation
- February 2020 - (draft) Background Document (outcome of public consultation)
- June 3 2020 - adoption of the 8th opinion RAC
- June 9 2020 - adoption of SEAC opinion
- 2022-2023 - discussions in the REACH Committees, potential adoption Q3-Q4 2023

Secondary microplastics

Considering the increasing pressure around the issue of microplastics, it was agreed that CEPE should be proactive on the issue and should therefore start generating degradation data for some outdoor coatings in the architectural and marine sectors. In 2022 CEPE contracted an independent research institute asking them to look at both the formation of solid microparticles and at the possible formation of soluble metabolites. At the time of writing, some very preliminary results from the two studies are available and will be discussed in the relevant groups. This is the first basic research project of its kind that should deliver interesting qualitative information and may be the basis for other research projects in the coming years.

What have we achieved?


Regarding primary microplastics, products like coatings that are film forming have been derogated from the restriction on the placing on the market.

What are the remaining steps?

As regards primary microplastics, the proposal of the EC has been delayed to 2023. For CEPE the remaining open issue is linked to the burden of the reporting obligation which currently stands as follows:

- For industrial customers, 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 users and consumers, members would also have to report annually the same directly.

The aim of the decision-makers is to understand if these contaminations will require further regulatory actions in the long run. 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 signal to the outside world i.e. that our industry increased the environmental contamination of microplastics. Our objective is to get a simplified reporting obligation for the generic description of polymer types.

As far as secondary microplastics is concerned, CEPE has started a scientific research study that will allow us to understand the degradation dynamic and routes of coatings exposed to weathering. 





CLP and Hazard Communication

The issue

The Classification, Labelling and Packaging (CLP) Regulation (EC) No 1272/2008 is one of the two key pillars to chemicals legislation in the EU (the other being the REACH Regulation). As you would expect, it is absolutely essential for there to be a comprehensive set of rules and criteria available to be able to correctly determine whether a chemical substance poses a hazard to either humans or the environment. CLP is currently broadly aligned with the global UN Globally Harmonized System of Classification and Labelling of Chemicals (UN GHS), so that informing and understanding the hazards is done in a uniform way between countries signed up to UN GHS. However this situation will change during the course of 2023, with the revision of CLP under the EU's Green Deal and Chemicals Strategy for Sustainability (CSS) activities. A key element to the CLP revision is the introduction of several new hazard classes into CLP, before these have been entered or even discussed at UN GHS level. This is setting a very dangerous precedent, with the EU's aspirations to be seen as the global leader and driver of chemicals legislation disrupting the status quo.

The legislative texts relating to the revision of CLP are actively being discussed and finalised at the time of writing. Part of this revision (the Delegated Act covering new hazard classes) is due to be published in the Official Journal within the coming months, whilst the Ordinary Legislative Procedure (OLP) text is timetabled for discussion within the

European Parliament (EP) and Council. In the meantime, current CLP-related activities continue to have an impact on CEPE members, especially with regard to the harmonised classification or reclassification of substances, and actions needed to be taken to comply with Annex VIII (Poison Centre Notification PCN requirements).

The EU political environment

Under pressure from multiple Member States and various Non-Governmental Organisations, the EU decided several years ago to introduce new hazard classes into the CLP legislation. These were to address mounting concerns over three key issues: endocrine disruption (ED); the presence of persistent (toxic) substances in the environment (that were 'bioaccumulating'); and the significant movement / mobility of persistent (toxic) substances from one geographical location to another. Several substances (listed on the Candidate List of Substances of Very High Concern (SVHC)) are already believed to meet the criteria for falling into one or more of these classifications through the evaluation of their respective dossiers under REACH. Thus CLP is effectively being revised to legally establish and identify those substances at the root of these key issues, even though Endocrine Disruption (ED) is a mode of action rather than an endpoint (comparing with, say, carcinogenicity or reprotoxicity). Once in place, these new hazard classes can then be referred to and used for further regulatory management under REACH – for example, it



is proposed under the revision of REACH that ED substances would be banned from use in consumer (and possibly some professional) mixtures under the Generic Risk Management Approach (GRA). Despite multiple objections from other countries signed up to the UN GHS, and from the global chemicals industry, the EU has proceeded with its plans, and we now face a very confusing and uncertain time, as clear and substantial divergence between CLP and UN GHS takes place during 2023-2024 and beyond. It is unclear whether realignment at a future date could take place, but at present this seems unlikely, bringing into the spotlight and questioning the whole purpose of having the GHS system.

What can we do and how?

Our sector is recognised as a major downstream user sector with a wide range of product types and uses, thus any changes to the CLP legislation can have a major impact on member activities. With regard to the CLP revision, CEPE has been actively involved in all the consultations and workshops set up by the European Commission (EC) and its consultant partners. The position of CEPE members has been shared on multiple occasions, both with regard to this divergence from the UN GHS, and also relating to the other elements proposed within the CLP revision (changes to online sales, digital labelling and the need for improved label legibility). As discussed in previous years, one of the most, if not the most, important aspect for CEPE is to have appropriate, pragmatic transition periods to allow members to make changes to labels and Safety Data Sheets (SDS).

Regarding the current impacts of CLP, most of the focus is on the Adaptation to Technical Progress (ATP) procedure through which the harmonised classifications (and reclassifications) of substances are introduced into law. This involves regularly reminding members of the timelines for the existing ATPs and informing members of future planned ATPs (which are discussed within the Competent Authorities for REACH and CLP (CARACAL) meetings). Over recent years 1-2 ATPs have been published annually, usually containing in the region of 50-60 substance reclassifications, that have been agreed and decided by the appropriate committees. In addition, the resulting 'domino' effect of changes to classification are identified and shared throughout the CEPE community, whether this be onward impact on substance approval under the Biocidal Products Regulation (BPR), the impact on packaging and transportation of mixtures, or the ban on use of certain substances for certain applications e.g. in products for the general public. Another key impact of a reclassification is the use of substances under EuPIA's Exclusion Policy, sometimes triggering a need for these to be substituted.


On some occasions we may be asked to provide supporting information and data to raise awareness about the impact of a new harmonised classification to the authorities. This can lead to major advocacy efforts across multiple industries, especially if there is strong cause to believe that the proposed harmonised classification is not scientifically justified. One good example of this relates to the harmonised classification of Titanium Dioxide (TiO₂) as a Category 2 Carcinogen in 2019.

What have we achieved?

One of the highlights of 2022 was the annulment of the harmonised classification for TiO₂ by the European Court of Justice in November. This was a result of extensive efforts by several key members, who challenged the classification, with support from CEPE as well as the Titanium Dioxide Manufacturers Association (TDMA). This emphasises the importance of researching and if necessary questioning the decisions that are taken by the authorities with regard to harmonised classifications, especially when these are not based on sound scientific arguments.

The two LSDS groups within CEPE continue to provide a platform for members to discuss CLP-related issues, and to see if a common approach can be followed for some of the more challenging issues. Most recently we have been discussing the impact of the reclassification of cumene as a category 1B carcinogen and the impact this has on the classification of most aromatic solvents used in paints and coatings. Other recent topics included how to handle nanoform reporting on SDS (which eventually led to a new statement from EuroColour), and where to put key non-mandatory labelling statements in an SDS. The 12th edition of the CEPE guidelines on SDS were also published in Spring 2022.

What are the remaining steps?

There is a need to continuously monitor CLP, both the existing legislation (with new substance ATPs), as well as the published proposals for the revision of this legislation. CEPE remains committed to continue serving its membership on activities related to CLP communication, compliance and advocacy. 

Biocides

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

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 focus in the past years has been to defend the continued use of skin sensitisers in-can preservatives of the isothiazolinone family (better known under the terms BIT, MIT, CMIT/MIT, OIT, DCOIT).

The EU regulatory and political environment

Biocides are means of controlling 'pests' or 'bugs' i.e. micro-organisms and macro-organisms everywhere other than on plants (pesticides are designed for plants and are regulated separately). Biocides therefore encompass 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 regulated in a few Member States. The preservatives were almost non-regulated (except wood preservatives). The Biocide Product Directive was adopted that year, then replaced by the BPR in 2012 (because the former did not work properly). By May 2000 the industry was requested to identify all the existing active substances and

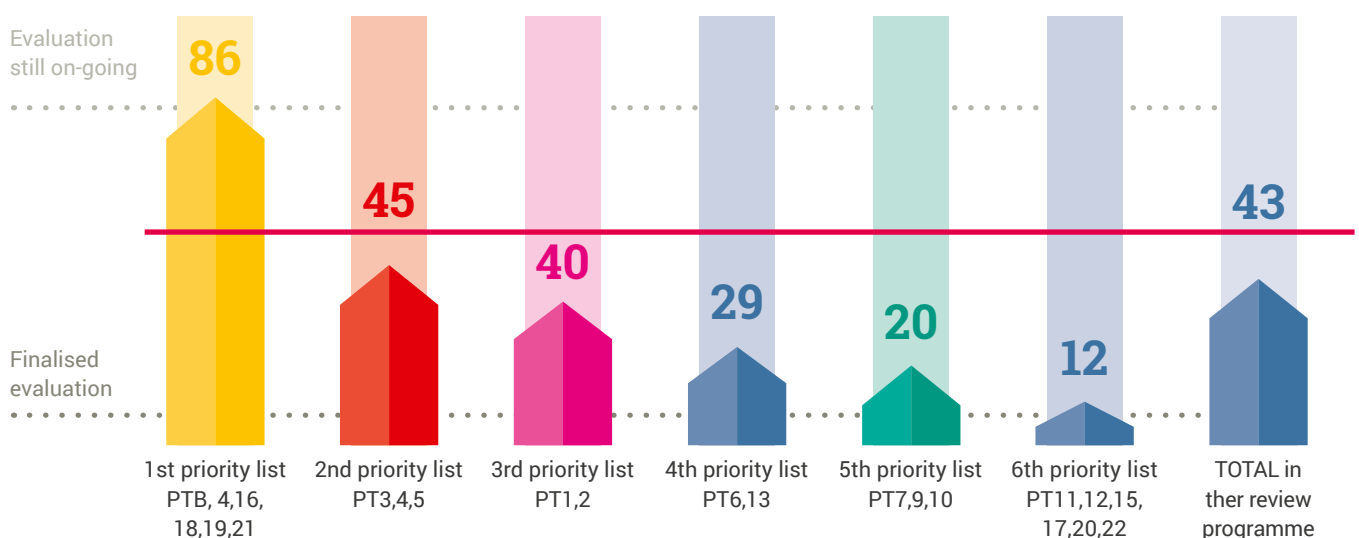
their uses (called Product Types) present on the market (around 1000 substances), and by 2003 the industry was asked to submit information to support the most important substances (estimated to be approximately 350). From 2004 to 2008, the industry was asked to submit full data packages for these substances. The in-can preservative dossiers were submitted in 2007 and the dry-film preservative dossiers in 2008. The review of existing substances then started. Member States were allocated substances to review. Most of the in-can and dry-film preservatives still have to be reviewed. Concretely, many files have been on the table of the competent national ministries for 15 years with no progress.

The review was first supposed to end in 2010, then in 2014, and with the BPR an extension to the end of 2024 was granted by the European Parliament (EP). Despite this extensive time frame, after 17 years of review and 2 years left before the deadline, only 43% of the entire review programme has been finalised as shown below (EC document 'Progress of the review Programme of active substances' from the 98th Competent Authorities meeting of December 2022). This is only 1% more than last year.

At the current pace, the review programme will fail. Why? Because of the very heavy and costly requirements, the extremely complex ever changing guidelines and the 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 ac-

Overall progress on the review programme of existing active substances per priority list

(in percentage)





Quelle: icarment13 – stock.adobe.com

propose a solution for paints. The proposal aims at maintaining the possibility of selling consumer paints even when these treated articles are classified as skin sensitizers under CLP. This is very much welcome as the official body in charge of (re-)classifying substances are following a conservative approach nowadays by setting very low specific concentration limits for the isothiazolinone substances. At the time of writing, we are expecting the EC to adopt this position in its implementing regulation approving BIT, which will set a precedent for other skin sensitizers.

What are the remaining steps?

Some Member States want this solution to be limited in time. They want industry to continue innovating and to move away from these biocide substances which they believe represent a risk in use. Innovation is crucial, not only because of the biocide legislation, but also because of the upcoming recast of the general chemical legislation REACH that will also include provisions to reduce the number of available substances based on hazard, and not based on risk (see separate article on CSS on page 13). For the time being the solution proposed by the EC is the way forward.

In the meantime, the EC has suggested that, for those paints classified as skin sensitizers, gloves shall be made available to consumers. This raises the question of how the gloves should be made available. Some Member States are calling for the gloves to be supplied together with the paint can, disregarding the complexity of supplying the right type and the right size of gloves, in addition to the cost of such a measure. The EC has opened the possibility for gloves to be made available in the DIY stores in a different manner, leaving it to industry to agree on the terms. At the time of writing, the discussion is still ongoing and we hope to achieve a pragmatic consensus.

In 2021, CEPE contracted RPA to carry out a socio-economic impact assessment for both in-can and dry-film preservatives. This report has been finalised and will be used whenever necessary for future advocacy needs. The overall conclusions is as follows:

“Overall, considering all market segments, this study indicates that reduced availability and use or non-use of PT 6 and PT 7 are likely to result in the closure of 5-31 % of the businesses surveyed and the partial closure of 19-47% of businesses resulting in the loss of between 100-4,000 jobs in the EU. The socio-economic costs of the four theoretical restriction scenarios (intermediate and worst case for PT 6 and PT 7) range between €115 million and €3.55 billion with many companies struggling more in the worst-case scenarios than in the intermediate scenarios. Additionally, issues associated with reduced lifespan, product quality and infeasibility of biocide free alternatives may have significant impacts on the livelihoods of industrial workers, professional painters and artists, as well as cultural heritage, visible social inequality (between those who are able to afford professional decorators and those who cannot) alongside severely reducing the product range available for consumers.”

CEPE, together with the help of national associations and a network of other industry associations, will continue to engage with authorities in the coming months and years. In addition, CEPE is also producing a series of documents aimed at raising awareness amongst decision-makers and stakeholders on the importance of biocides

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

The BPR lies in unbalanced regulatory hands and this has been the case for over 20 years. It has been more than challenging to find support be it in the Directorate General Grow of the European Commission (EC) or in national ministries of economy. We are operating in a highly political environment.

The Council of the European Union was made aware of this situation pointing to insufficient resources at Member State level.

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 users' associations, mainly the detergent industry, as well as with the biocide suppliers, to jointly address our common problem.

What have we achieved?

It has taken us over eight years to have decision-makers accept that there is, indeed, an issue and that it needs to be solved and to get the EC to



Exposure Scenario and Risk Assessment Group (ESRAG)

The Issue

Under REACH manufacturers and importers of chemical substances have the duty to register their substances and to provide safe use information in their Safety Data Sheets (SDS). 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 the coatings and ink industries. It is the responsibility of downstream users, including all members of the CEPE community, to confirm that safe use can be demonstrated down the supply chain and to communicate safe use information – how customers can use the products supplied in a safe manner, perhaps by using Personal Protective Equipment (PPE).

The EU regulatory and political environment

The latest proposals with regard to revising REACH and CLP, and the possible impacts on CEPE members’ businesses, will necessitate a considerable increase in investment by members in order to keep up with the regulatory developments. The introduction of the new hazard classes into CLP, especially Endocrine Disruptors (ED) and the Mobility-related classifications, will lead to more assessments and challenges to prove safe use, often requiring higher tier risk assessment using more complex tools such as ART. In addition, the proposal to introduce a Mixture Assessment Factor (MAF) into the REACH regulation has the potential to profoundly affect the current approach to risk management and safe use. Finally, the possible extension of the Generic Approach to Risk Management (GRA) to additional hazard classes and to professional users will provide sig-

nificant additional challenges to industry, as the list of banned substances will increase.

The general trend from the EU authorities to move away from a risk-based chemicals legislative framework to a hazard-based approach to banning substances needs to be counter-balanced with strong arguments from industry demonstrating safe use of mixtures under normal conditions of use. Where this is not possible then substitution of the hazardous substances will need to be a priority activity.

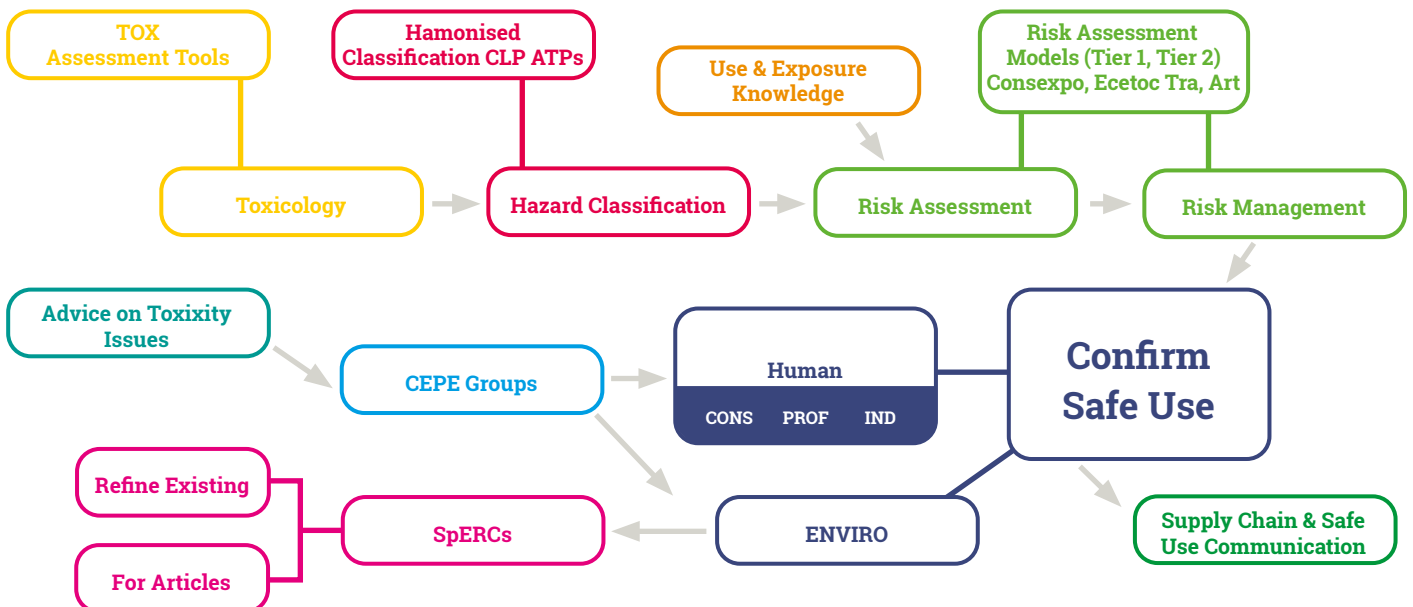
What can we do and how?

Due to the fact that there is only limited expertise within the CEPE membership to carry out risk assessments, ESRAG aims at helping companies comply by providing generic advice on how to demonstrate safe use for a number of substances. ESRAG is also responsible for maintaining the supporting framework of tools and documentation required, including the Specific Worker Exposure Determinants (SWEDs). Thus, the activities of the ESRAG group are going to be even more important over the coming years, to support the CEPE membership in maintaining and ensuring compliance.

What have we achieved?

With the help of ESRAG participants, members are now able to run Tier 1 assessments on substances for industrial and professional uses based on the CEPE SWEDs, and have been supported in the use of the ConsExpo tool for consumer applications. Sector-based risk assessments on over 20 key substances have been developed and shared,

Vision 2 for ESRAG – As a Process





Source: u photostock - stock.adobe.com

although some of these now need further review in light of new hazard classifications / reclassifications. The group has also developed two new visual representations of their different activities and responsibilities. Although Tier 2 risk assessments are more complex and require more detailed information on customer parameters, the group is now moving forward with training on the ART tool, and how this may be used to refine the assessment and allow members to continue to demonstrate safe use for certain key substances.

« Environmental concerns due to the use of hazardous substances that may pollute (especially into water courses) is now very much in the spotlight »

What are the remaining steps?

The coming months and years are going to require a considerable acceleration of ESRAG's activities, as more substance (re-)classifications impact on proving safe use of the mixtures produced by CEPE members. There is a clear need for a better understanding of the impact of the introduction of ED as a new hazard class into CLP, including identifying those substances that may fall under this classification (which may then be banned under the GRA), and the consequential changes to risk management measures (RMM) required. Also, the discussions surrounding different application scenarios, especially the need for better clarification and identification of the various levels of professional use (trained vs. untrained), will require the support of ESRAG.

Environmental concerns due to the use of hazardous substances that may pollute (especially into water courses) is now very much in the spotlight, linked to the concerns over microplastics, and the 'end-of-life' scenarios for painted items (contamination if land-filled, for example). To address these issues, additional working groups have started up in recent months, looking to refine the current supporting tools, such as the Specific Environmental Exposure Release Categories (SpERCs), as well as investigate the possible release of substances into the environment from finished items / articles (in effect addressing the service life of an article) due to e.g. paint degradation from metal infrastructure, leaching of substances from surfaces by rainwater. ◀

Transport

More than 50% of all transported paints, coatings and inks are classified as dangerous goods. There are numerous international transport regulations which need to be closely monitored to ensure member compliance and engagement when a major impact is foreseen.



Source: GustavsMD - stock.adobe.com

CEPE's Technical Committee Transport (TCT) focuses on the activities of the different international bodies responsible for regulating the transportation of goods by road, rail, air and on the sea. Much of the effort is concentrated on reviewing new proposals that are brought to the relevant committees, especially those involving potential changes to existing regulations on how to package and label different goods, and the modes of transport permitted to be used. The Committee also makes its own proposals to resolve current challenges faced by the paints, coatings, inks or artists colours' sectors.

The main regulations concerned are the overarching UN Model Regulations on the Transport of Dangerous Goods (MRTDG), the International Maritime Dangerous Goods (IMDG) Code for sea, the International Civil Aviation Organisation (ICAO) Technical Instructions for air and, in Europe and beyond, the International Carriage of Dangerous Goods (ADR), the International Carriage of Dangerous Goods by Rail (RID) and ADN for road, rail and inland waterways respectively. The TCT's work is carried out in conjunction with the World Coatings Council (WCC), and with close cooperation with the American Coatings Association (ACA), to ensure comprehensive monitoring and that proposed changes are globally acceptable.

In 2022 the issue of the small packaging (5 – 30 litres) for UN 3082 class 9 environmentally-hazardous goods continued to dominate the activities of the TCT. This issue arose due to the reclassification of certain preservatives through the 15th Advancement to Technical Progress (ATP) in the European CLP legislation, with the new 'M-Factors' triggering the environmental 'dead-fish / dead-tree' pictogram on many decorative paints. The limited availability of UN-approved packaging for such product offerings, combined with the issue of requiring packaging

appropriate for use for decorative paints requiring point-of-sale tinting, has resulted in the need to petition for changes to the transport regulations at both EU and global level. The situation is currently resolved for European road transport through the ADR regulation (but only until 2025), however this remains a major issue at global level. During the course of 2022 the TCT submitted two documents to the UN's Scientific Committee of Experts for the Transport of Dangerous Goods (UN SCETDG) committee, explaining the detailed background to the issue and offering 4 different options to resolving it. Unfortunately only very limited support was provided from the country delegations attending the meeting, and none of the proposals were supported during the last meeting of the biennium in December 2022. This issue will therefore continue to dominate the TCT's activities during 2023.

The TCT have also been closely monitoring the discussions surrounding the transportation of plastic pellets by sea, and the proposals to revise the regulations in light of the sinking of the MV X-Press Pearl container ship off the coast of Sri Lanka in June 2021. There are concerns that these revisions may have an impact on the transportation of powder coatings and / or of raw materials such as resins supplied in pellet form. The final decisions regarding the revision are still pending.

Additional activities of the TCT during 2022 included the publication of a new chart summarising the different transport classifications and regulations relating to paint, some initial discussions surrounding the upcoming digitalisation of transport activities and procedures (including information transfer and communication), and the progress being made in China, with the possible introduction of ADR-type regulations and also the extensive use of QR codes.



Artists' Colours

The Issue

While EuACA members have very similar interests as other CEPE members, due to the nature of the raw materials they use, there are several topics that are of particular interest to our Artists' Colours groups, covered by the Sector Group and Technical Committee during their meetings.

The EU regulatory and political environment


In addition to the impact of CLP and REACH on chemical substances and mixtures, our Artists' Colours members are also concerned about changes to the Toy Safety Directive. A consultation was held on this topic during the Spring of 2022, with several important questions posed, including the possibility of changing this Directive to a Regulation, and also the suggestion to introduce 3rd party conformity testing. Although to-date no further proposals or decisions have been taken, both changes, if pursued, would have significant implications on our members. The sector is also monitoring changes to national labelling requirements related to environmental issues such as waste disposal and recycling (e.g. the introduction of the Triman label in France). Labelling of Artists' Colours products in general is understandably extremely challenging due to the nature of the products and the complexity of their business. As a key focus of the Chemical Strategy for Sustainability (CSS) is the sale and use of chemical mixtures by consumers, EuACA members will need to follow closely the developments of the CSS as part of the Green Deal activities, especially in terms of the Generic Risk Management Approach (GRA) and possible ban on the use of certain substances.

What have we achieved?

A major focus for 2022 was to try and tackle the issue of the standard EN 71-3, and the challenges associated with achieving consist-

ent test results for heavy metal contents in toys. After some initial information gathering, EuACA (CEPE Secretariat) formed a working group along with Toy Industries of Europe (TiE), the European Writing Instruments Manufacturers' Association (EWIMA) and the chair of the CEN Committee TC 52 WG5. This group evaluated the information provided and then presented some comments and suggestions on how to tackle this issue, with a resulting white paper published in November 2022. This paper has been positively welcomed by all the different stakeholders and will now form the basis for further discussion within the Standardisation committees and within the trade associations, in conjunction with the accredited testing laboratories. In addition, the Artists' Colours Technical Committee (AC TC) has been working closely with our French colleagues (FIPEC) to establish the impact that the new French environmental labelling legislation will have on their business.

Next steps

Issues surrounding sustainability and the circular economy are coming more into focus now for the EuACA's sector – what to do with waste packaging after use, how to assess the environmental impact of products (through Life Cycle Analysis techniques) and what the impact will be from the Packaging and Packaging Waste Regulation (PPWR) proposal, and Extended Producer Responsibility (EPR) legislation. At the same time, the introduction of new elements through the revision of CLP will also be of key interest to the sector. For example, there is a hope that the option to provide labelling information through a digital format could ease the current space constraints on physical labels. There is also the intention to introduce new provisions and derogations for the small pack sizes that are in use. 





Can Coatings

Can Coatings in direct contact with food are designed to be safe and rigorously tested. They fall under the scope of the EU Framework Regulation 1935/2004 on materials and articles intended to come into contact with food.

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 on the market safe products. This is also true for can coatings which are in direct contact with food. The European Parliament (EP) has heard the concern and has put pressure on the European Commission (EC) 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 and beverages 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 EC 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, 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 materials in contact with food mostly lies with industry, which makes it open to criticism »

The safety of materials in contact with food mostly lies with industry, which makes it open to criticism. The EP and EC are also calling for more scrutiny. For instance, EFSA, who is responsible to assess pesticides, 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 Coatings 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, for the most part, been 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 sectors, who produce or use materials which come in contact with food (such as paper and board, kitchen appliances, glass), in order to adopt uniform principles to ensure compliance with legislation on food contact materials.

Today, risk assessment and risk management principles have been agreed. 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 the industry is doing and thereby reduce concern about leaving safety issues in the hands of the industry.

What have we achieved?

The agreement by many industrial sectors of uniform principles for risk management and risk assessment is a success. Within our joint industry (the rigid metal packaging supply chain) a dedicated group (TSC-35) was established and has developed, over three years, guidance to demonstrate safety in food contact material, templates for the Document of Compliance (DoC) and are discussing the concept of a

database to facilitate the work of enforcement authorities (digital traceability). This work is essential to be able to demonstrate to, ultimately, the outside world that the industry is acting responsibly and thereby avoid unnecessary new legislation.

Another group (TSC-32) has been working, for the last 4 years, on a dedicated toxicological project on a specific substance (a Non-Intentionally Added Substance aka NIAS) and has progressed as planned despite the Covid situation. The €700,000 project, financed by three associations and six member companies of CEPE, has come to an end. A scientific publication showing the clean toxicological profile of that impurity was foreseen in 2022 but was delayed to 2023. Meanwhile, a public presentation was given in December 2022 summarising the outcome of the study and highlighting that industry had acted responsibly, while stressing that a similar approach for all NIAS is not possible. CEPE has taken the Technical and Financial Secretariat of the project.

The draft EFSA opinion on BPA (bisphenol-A) published at the end of 2021 suggesting a reduction of the Tolerable Daily Intake (TDI) by a factor of 100.000 led to many discussions in our supply chain. Rebuttals were submitted during the public consultation, especially about the new scientific approach and based on a non-conventional study. At the time of writing, EFSA has not yet finalised its opinion and it remains unclear how this will impact BPA based epoxy coatings. Nevertheless, we have discussed with our customers' association MPE how to face this new situation.

The EC issued at the end of 2020 an Inception Impact Assessment, which we commented on together with our customers of the metal packaging industry.

During 2021, our industry was invited to present its views in several workshops/conferences. DG Sante of the EC has also regularly explained its current thinking i.e. to focus on what consumers can be exposed to rather than establishing positive lists of acceptable substances and their migration limits for all non-harmonized materials, and how to best amend the food contact material legislation to also take into account the Chemical Strategy for Sustainability (CSS) push for a more hazard based approach. The CSS topic is discussed in a dedicated TSC-36 group involving our supply chain. In 2022, several interactions with the EC revealed that there were some delays due to the fact that the subject is sensitive and difficult, but that a revision is still expected along the lines described above.

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 EC is going to react following the publication of the recent study. The EC has announced in its Farm to Fork Strategy that it will present a proposal for a revision of the EU legislation on Food Contact Materials in Q4 2022. This has now been postponed to the new Commission.

Given the current EU political environment and the increasing concerns as regards endocrine disruptors, NIAS developments are likely. CEPE will continue to support the necessary work of the Can Coatings group.



Decorative Coatings

By volume, the Decorative Coatings segment is the largest within the entire paints and coatings industry. It is still facing the same challenges as in the past, such as the EU Ecolabel, PEF, biocides, secondary microplastics just to name a few.

The Issue

The Decorative Coatings' priorities are similar to those of previous years.

1. The Chemicals Strategy for Sustainability (CSS)

The developments proposed in the Chemicals Strategy for Sustainability (CSS) (see separate article on CSS on page 13) could result in generic bans of substances in consumer and professional products.

2. Sell through period for re-labelling

One of the consequences of a reclassification of a substance is the issue of sell-through period. Indeed, once a substance is officially reclassified, 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 products 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).

3. Biocides

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

4. Extended Producer Responsibility (EPR)

The Circular Economy Action Plan supports waste prevention and circularity. Among the proposed initiatives is the enhanced implementation of the adopted requirements (Directive (EU) 2018/851 on waste) for extended producer responsibility schemes (EPR). The European Commission (EC) considers EPR schemes as a suitable instrument for holding manufacturers accountable for waste from their products as it corresponds to the "polluter pays principle". Therefore, Member States have until 31 of December 2024 to establish EPR schemes for all packaging (Directive (EU) 2018/852), though, different EPR schemes exist for the packaging materials. It is important to identify if paint as a product can be targeted under the EPR.

5. The EU Ecolabel and PEF

As the number of substances classified increases, the number of derogation requests in the EU Ecolabel and other national labels is also on the rise. This is because the criteria exclude several hazard categories of substances, some of which are essential such as biocides. The future of the EU Eco-label system is at risk. In parallel, the Deco Sector Group has invested a lot of time in the design of a Product Environmental Footprint (PEF) system that eliminates such qualitative criteria as in the EU Ecolabel and instead considers the whole life cycle of the paint product, thereby offering a more holistic approach than other initiatives. The Product Environmental Footprint (PEF) takes into account the entire cradle to grave approach for assessing the life cycle impact of a product. CEPE has already developed a PEF Category Rules (PEFCR) for decorative paints. The importance of PEF cannot be undermined with the increasing inclusion of the PEF tool in various policy initiatives such as the Eco-design for a Sustainable Product Regulation (ESPR), the Safe and Sustainable by Design concept, Green Claims. Currently,

the PEF project is limited due to the validity period of the datasets used, which means that the PEFCR will be valid for a shorter time making the revision process more frequent.

6. Voluntary initiatives of the Deco sector

Decorative paints represent the largest segment of paints. Yet, unlike other kinds of paints such as marine or protective coatings, the contribution of deco paints to society is underestimated. With fewer substances available in the future, the Deco Sector Group is keen to put forward the attributes of decorative paints and is developing several voluntary initiatives aimed at raising awareness on the role and positive contribution to society and to sustainability of deco paints.

The EU regulatory and political environment

The above-mentioned issues are linked to several pieces of legislation: Regulation (EC) N° 66/2010 on the EU Ecolabel, Regulation (EU) N° 528/2012 concerning the making available on the market and use of biocidal products, Regulation (EC) N° 1907/2006 concerning REACH and Regulation (EC) N° 1272/2008 on CLP. The starting point is often a new adverse classification given to a substance. 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 but on perception.

What can we do and how?

1. The CSS

The Deco Sector Group needs to continue engaging in the EU CEPE Green Deal CSS ad-hoc group.

2. Sell-through period for re-labelling

When a new substance classification is published in an Adaptation to Technical Progress (ATP) to CLP, industry is given, normally, 18 months to amend the label. While 18 months is sufficient for products first placed on the market, it is not the case for several products of our sector that are already in the supply chain. Therefore, CEPE needs to approach the EC while National Associations need to approach their Member States to try to agree on an interpretation as to which products need to be re-labelled. CEPE is of the opinion that the definition of “placing on the market” under CLP should be aligned with the definition used in other regulations (biocide, detergent, cosmetic, construction) where the “placing on the market” means “the first making available”.

3. Biocides

For the overview on biocide in-can preservatives and consumer paints, see separate article on biocides on page 30.

It should be noted that the important ongoing advocacy activities for in-can preservatives should benefit also the dry-film preservatives. The latter are in an even more difficult situation due to the fact that there are very few remaining algaecides and fungicides available to protect the applied film for many years.

CEPE participates in public consultations to support these substances and more importantly, has a seat on the EU Competent Authority meetings (chaired by the EC with the participation of all Member States Competent Authorities on biocides).

Also, CEPE has carried out, some years ago, a study on 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 have sufficient products to offer in the long term.

4. EPR

CEPE has established an EPR working group under the CEPE EU Green Deal Task Force to assess the current EPR situation in different Member States and the technical feasibility of EPR schemes for both paint and paint packaging.

5. Ecolabel and PEF

CEPE works closely with the EU Eco-labelling Board (EUEB) to explain the difficulties of our sector and, when necessary, to request derogations. The EUEB is managed by the EC and is made up of representatives of Member States.

For many years now, CEPE has invested in a PEF system for paints. We now have a system that we may want to proactively promote. We are of the opinion the PEF should not be integrated into the Ecolabel as the two systems are incompatible. The reason is that the EU Ecolabel focuses more on the individual substances, while the PEF covers the whole life cycle of products.



CEPE has engaged in discussion with the PEF Team of the EC asking for a longer validity of the datasets and legal certainty about the PEF tool in order to remove potential hurdles for taking up the revision of the PEF-Category rules (CR). The EC is still in discussion with the background datasets providers (Sphera, Ecoinvent, etc.) as regards extending the validity of the datasets to a longer period. The outcome of this might be known in 2023.

6. Voluntary initiatives of the Deco sector

In addition to the activities on regulatory issues, the Deco sector group is engaging in voluntary initiatives to promote decorative paints towards decision-makers and consumers. A small group was set up to investigate possibilities and to make some concrete proposals to the Deco Sector Group.

What have we achieved?

1. The impact of the CSS

The Chairman of the Deco Technical Committee is very active in the CEPE EU Green Deal CSS ad hoc group given the threat that the CSS poses to consumer and professional products (see separate article on page 13).

2. Sell-through period for re-labelling

The Deco group issued a guidance early 2020. This topic was also addressed during the public consultation on the amendment of CLP under the CSS (see separate article on page 13). Data collection on quantified costs and waste generation is still ongoing.

3. Biocides in-can preservatives

As explained in the separate article on biocides on page 32, for biocide in-can preservatives we have achieved a clear momentum whereby the EC and Member States now understand the importance of these substances and the need to find a solution. The key in-can preservative BIT should also have passed most hurdles.

Building on the success of biocide in-can preservatives, CEPE has also increased the attention of authorities on our forthcoming issue. The laboratory testing of the leaching project and the report of the semi-field leaching part are now finalised. We presented the latter to the ECHA Biocide Product Committee Working Group Environment early 2021 that welcomed this initiative of CEPE. This was followed by some constructive feedback and further questions to which CEPE responded, together with the biocide suppliers. The future of dry-film preservation remains quite uncertain due to the ongoing reclassification of the remaining substances. Further work is expected when derogations under the BPR exclusion criteria will be needed.

The public affairs network also carried out a biocide campaign (see separate article on page 5).

4. EPR

Initial discussions in the EPR group paved the way to identifying two key indicators when it comes to paint takeback or recycling of paints. The first is to identify the different paint streams in municipal waste that can be a key indicator in order to identify and assess the untapped potential offered by leftover paints. The second is to identify the existing Producer Responsibility Organisations (PROs) that can fulfil the EPR obligation for paint companies in the different Member States.

5. Ecolabel and PEF

The EU Ecolabel replicates the REACH and CLP regulations making a duplicate gateway for those substances which have been assessed to be safe under the most stringent regulation in the

world, for example the EU Biocides Product Regulation. As the option for preservatives becomes more and more restricted in the EU Ecolabel, CEPE alongside the biocide producers submitted a derogation request for biocides such as NaPT, ZnPT, Bronopol, and DBDCB. CEPE highlighted its concerns on compromising product quality arising from the Ecolabel's criteria for eliminating biocides. Alternatively, the Nordic Swan has proposed to the European Union Eco-labelling Board (EUEB) to allow the use of more isothiazolinones as the options for biocides are reducing. This proposal is currently under investigation, and the outcome will be known in 2023.

Despite the challenges raised within the PEF project, the PEF TS group of CEPE has managed to successfully develop a calculation model for performance classes for the PEF Score (A-E). This will help the consumers to better understand the environmental impact of the product and to simplify the amount of information needed to make a sustainable buying choice. The next step is to roll out the performance classes exercise to a wider CEPE membership in order to balance the spread between different classes of A-E.

6. Voluntary initiatives of the Deco sector

The first topics identified for action were microplastics and biocides. Regarding microplastics, the animation produced by the Dutch association (VVVF) on the disposal of paint brushes was translated into six languages and an accompanying leaflet was developed. Both were readily disseminated. A social media campaign on the need for biocides was also developed (see separate article on public affairs on page 5).

What are the remaining steps?

1. CSS Development

This is a critical area where the Deco group will continue to actively support the CSS group.

2. Sell-through period for re-labelling

The Deco group will continue to support the work under the revision of CLP to correct the interpretation of 'the first placing on the market'.

3. Biocides in-can preservatives

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

Regarding biocide dry-film preservatives, further follow-up is planned on the outcome of the project with relevant authorities at the ECHA BPC WG Environment.

4. EPR

The EPR TF will collect post-consumer paint waste data from different national associations. Furthermore, national associations are reaching out to their respective painters' association to understand the handling of waste paint.

5. EU Ecolabel and PEF

CEPE will follow-up on the issue of biocides. Also, further discussions will take place in the Deco groups with regard to the future integration of the EU Ecolabel and PEF wanted by the EC.

6. Voluntary initiatives of the Deco sector

The Deco Sector Group has agreed to carry out at least one communication campaign through social media in the first half of 2023 on the role of paints and the positive effects it has on people. Further activities around the issues of the disposal of paint brushes and biocides will be carried out and new initiatives sought.

EuPIA Annual Report 2022

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 2021

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 27 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, 2021.

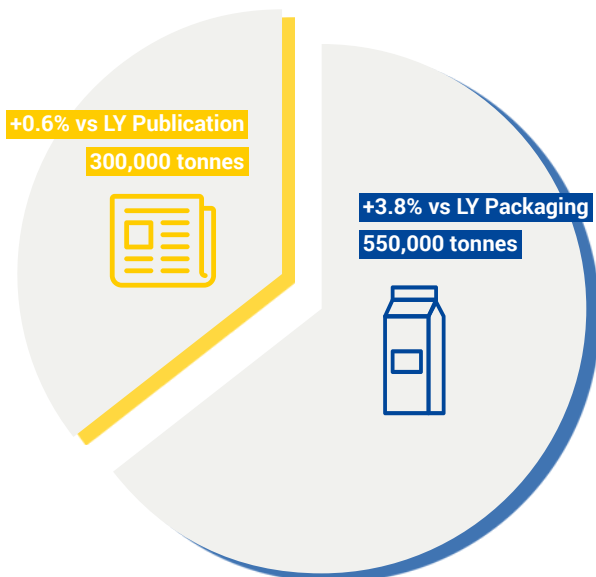
It is estimated that the sample group accounts for about 90% of total industry sales in Europe.

Key sectors shown

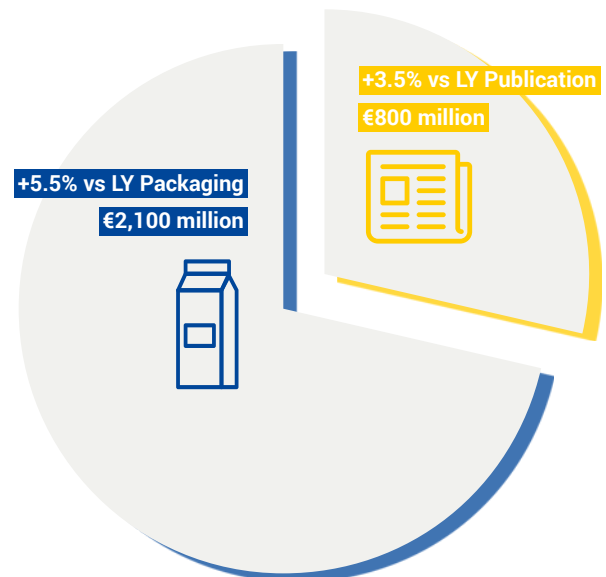
Publication Inks comprise web offset inks (coldset and heatset), sheetfed offset inks, publication gravure inks and related overprint varnishes. Examples of publications are newspapers, magazines, books, and commercial prints such as brochures and flyers.

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).

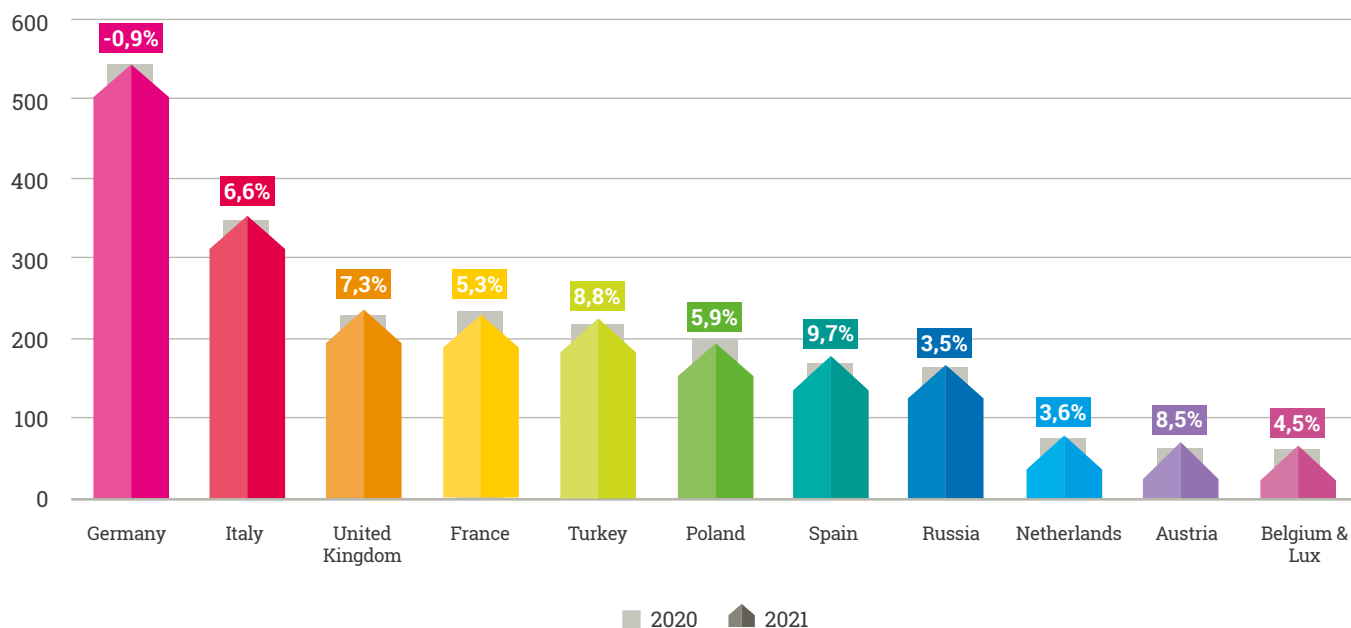
Sales volume for 2021



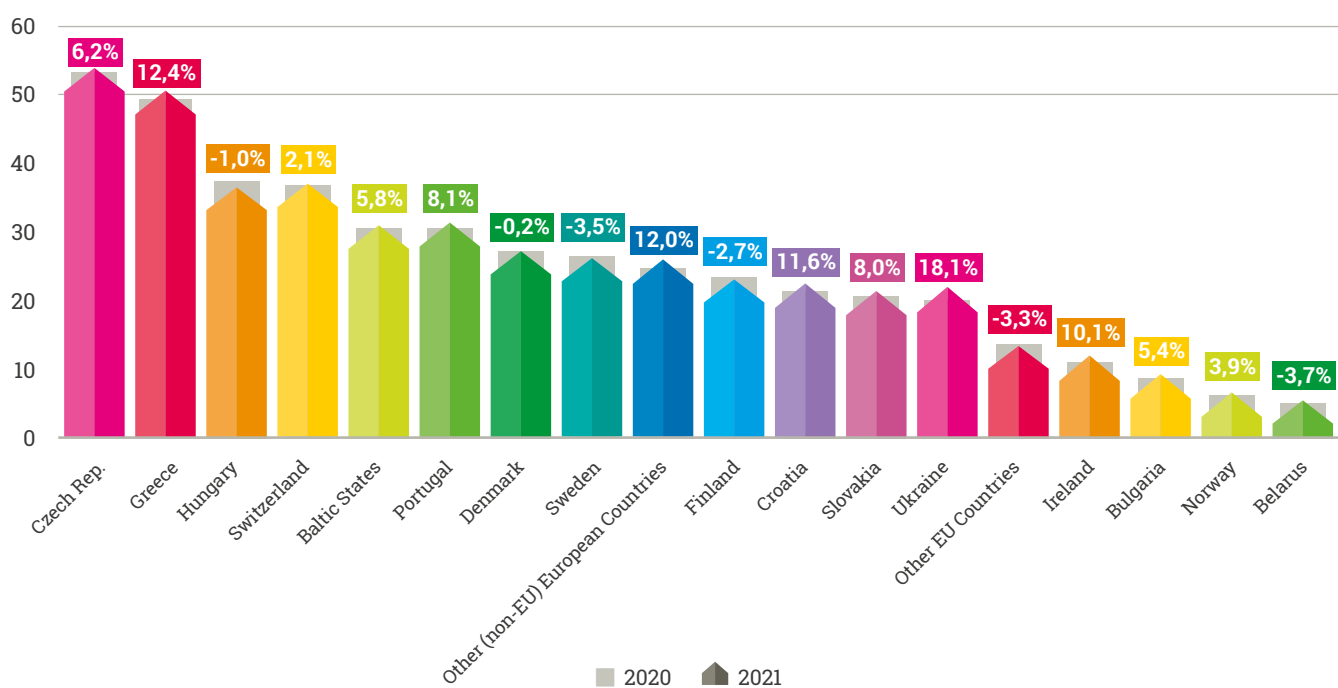
Sales value for 2021



Sales Value by country 2020 to 2021 in €m



Sales Value by country 2020 to 2021 in €m



EuPIA Annual Conference

Due to the persisting uncertainty resulting from the Corona pandemic regarding meeting and travel conditions, the EuPIA Annual Conference was again conducted virtually, as in the previous year. However, this did not detract from the attractiveness of the conference: the number of participants was even higher than in previous years.

The EuPIA Exclusion Policy for Printing Inks and Related Products

For the last 25 years, the EuPIA Exclusion Policy for Printing Inks and Related Products (and its predecessor, the EuPIA Exclusion List) has had a tremendous value for the printing ink industry, the printers/convertors, brand owners, retailers and consumers as it ensures the safety of inks used across Europe. In short, the policy is about excluding hazardous chemical substances which have a serious adverse effect on human health from the manufacture of and use in printing inks, protecting workers along the whole supply chain as well as customers. The EuPIA Exclusion Policy is THE product stewardship initiative of the ink industry in Europe and as such, is well respected across the market.

The introduction of the 4th edition of the Policy in March 2021, along with the positive commitment from members through being listed on the EuPIA webpage, has been welcomed by the European printing ink sector and their customer base. The Policy is now available in four languages – English, French, German and Italian. A further refinement of the Policy was introduced during 2022, with the publication of a new Annex to the Explanatory Note, defining the term ‘Related Products’ which effectively clarifies the scope of the Policy (which products supplied by EuPIA members should be complying with the Policy).

A couple of procedures within the Policy have also been put to the test recently, as a result of the harmonized reclassification of several key substances used in printing inks through the 18th Adaptation to Technical Progress (ATP), the basis for reclassifying chemical substances under the Classification, Labelling and Packaging (CLP) regulation EC No. 1272/2008. The Exclusion Policy Advisory Panel (EPAP) has also started up its activities and is already being called upon to recommend possible courses of action relating to a long-standing Exclusion Policy issue linked to use in digital inks.

Printing Inks and Varnishes for Food Contact Materials

Printed food contact materials (FCMs) remained one of the key topics of EuPIA also in 2022. With specific legal rules for printed food contact materials still lacking at the EU level, EuPIA continued to adapt and improve its comprehensive set of guidelines, which all aim to detail out the general requirements of the Framework Regulation (EC) No 1935/2004 with regard to printed food contact materials and support the converters and distributors of food contact materials in their compliance work. These guidelines set standards in many areas, such as migration testing, risk assessment or transparency in the supply chain and are the visible proof of the printing ink industry’s high level of commitment when it comes to food safety, which is almost unparalleled in the value chain.

The set of guidelines are publicly available on the EuPIA website:



Notwithstanding all these efforts to further enhance the safety of printed food contact materials through industry initiatives, EuPIA together with the entire food packaging chain in Europe has continued to advocate a harmonised European regulation for printed food contact materials. Together with the supply chain (see below) high level letters were sent to the European Commission and the topic was addressed in recent meetings with ranking Commission officials. Furthermore, with the help of EuPIA’s network of national associations, members of the European Parliament were approached and asked for support. Indeed, many parliamentarians realize that it is critical to timely adopt a harmonised European regulation for printed food contact materials.

EU Commission started evaluating the legal framework

Although a specific regulation for printed food contact materials is, despite all efforts, still not in sight on the EU level, the European Commission is not inactive: The process of the evaluation of the Framework Regulation has gained momentum. The core of the Framework is over 40 years old, yet it has never been systematically evaluated and hence does not take “new” developments such as REACH into account; therefore, a thorough evaluation makes sense. The Commission’s processes foresee a so-called inception impact assessment, including a public consultation on the policy options, followed by the actual impact assessment, in which the policy options are assessed in detail. Afterwards the results will be published, and the new legislation will be drafted.

In December 2020, the public consultation on the inception impact assessment, in which the Commission identified eight “fundamental issues” with the current legal framework, had started roughly half a year later than originally announced. The Commission proposed to shift the focus onto the final article and to prioritize the assessment and management of substances via a tiered approach. EuPIA carefully evaluated the policy options and provided detailed feedback, which was also coordinated with the whole value chain.

During 2021 the Commission worked on a so-called staff working document which was finally published in summer 2022. The Commission concludes that the Framework Regulation is, “in general, internally coherent”, with the main exception of the provision “which has allowed EU Member States to introduce or maintain national measures in the absence of specific EU rules.” Especially with regard to the so-called German Ink Ordinance this is well aligned with EuPIA’s demand for more harmonization. Moreover, the document contains several other points to which EuPIA can tie in with its positions, such as the deficiencies of closed positive lists of substances. Although the document did not contain many new information, it corroborated the assumption that the Commission is aiming for a fundamental change of the legal framework. It seems to become clear that the new framework could contain much more details than the current one, which in turn also offers the opportunity that the modern concepts of risk assessment, as currently practiced by EuPIA members, could become part of the new framework. The plans of the Commission, however, also contain several risks: The Commission intends to also incorporate hazard-based approaches as envisaged in the EU’s Chemical Strategy for Sustainability, which could result in a paradigm shift in the EU’s regulatory approach for food contact materials, away from the current purely risk-based approach.

End of 2022 the public consultation on the revision started as part of the actual impact assessment in the form of a rather intricate question-

naire. EuPIA was one of the first associations to position itself and was hence able to offer its ideas for alignment with the entire FCM value chain at an early stage. In addition to the consultation, stakeholder interviews have started and EuPIA already had the opportunity to share its views before the Christmas break.

The original timetable of the Commission as set out in the Farm-to-Fork Strategy of the Green Deal foresaw that the final legislation should be presented end of 2022; however, the Commission is significantly lagging behind its schedule and hence even an adoption in 2023 will be challenging.

The Packaging Ink Joint Industry Task Force - Activities of the entire Value Chain

Already in 2018, the Packaging Ink Joint Industry Task Force (PIJITF), in which all associations of the value chain for packaging inks come together, has proposed a blueprint for a harmonized legislation for printed food contact materials (pFCM). Since then, the PIJITF has proven to be a very active platform for the exchange between the different associations representing the value chain and to provide a voice for their common interests. Consequently, the PIJITF has also in 2022 been advocating the timely development of harmonized EU legislation for printed FCM and promoted the concepts detailed out in its blueprint. The relevant Commissioners were approached, stressing the urgent need of an increased harmonization due to the imminent threat to the common market, which will arise after the transition period of the so-called German Ink Ordinance has ended. Based on the information provided in the Staff Working Document, the PIJITF updated its position and submitted it to the Commission, as a contribution to the public consultation.

The PIJITF also dealt with another and new paradigm proposed under the Commission's Chemical Strategy for Sustainability, the so-called "One Substance, One Assessment" concept. This concept has the potential to offer opportunities for downstream users in terms of re-use of data generated under REACH for the assessment of substances for FCMs. A PIJITF delegation, including EuPIA, met several times with the Commission and ECHA to explain the unique needs of the FCM value chain.

Finally, the PIJITF adopted its Guidance on Information Flow and Transparency in the Printed Food Packaging Supply Chain, which details out the information that needs to flow downstream as well as upstream. With this guideline the PIJITF defines the best practice of what constitutes adequate information for the compliance work at each stage of the supply chain. This topic will be of high importance in the revision of the EU legal framework and hence it is important to provide the Commission with a working example of a functioning system. With its Statement of Composition, the printing ink industry is already today setting an example of how adequate information can be transferred.

Germany: The so-called Printing Ink Ordinance

Due to the lack of specific rules for printed food contact materials on the EU level, Germany has been planning a national piece of legislation since 2010. In 2016, when the EU Commission had announced to work on harmonized rules for printed food contact materials, it seemed as if the plans for the so-called German Ink Ordinance (GIO) had become obsolete. However, due to the changed timeline at the European level, which was a consequence of the prioritized revision of the framework,

the German Federal Ministry of Food and Agriculture (BMEL) took up the initiative in 2020, arguing that the Commission has failed to keep its promise to provide a European regulation. Despite severe criticism of the German national association, VdL, and the whole German packaging value chain, the ordinance entered into force in December 2021, however becomes applicable only after a transitional period.

The final version contains some small but nevertheless important changes in the wording of the legal text. The incompleteness of the positive list, however, is still a big issue, which was also acknowledged by the legislator and a corresponding transition period of four years has been set till the end of 2025. This period must now be used by the raw material suppliers to complete the list. Consequently, there is currently also no basis for requesting confirmation of compliance with the requirements of the Printing Ink Ordinance. Printing inks for food contact materials, which are manufactured or distributed in accordance with the guidelines of EuPIA, comply with all relevant European legislation on food contact materials. This also applies for Germany until the transitional period has expired and is applicable regardless of whether the ink components are listed in the still incomplete positive list of the German regulation or not. To address concerns and questions of converters and brand owners, VdL organized webinars in English and German, which were attended by over 660 participants in total.

Together with selected raw material suppliers, VdL is currently heavily engaged in a "regulatory sandbox" project organized by the BMEL in conjunction with the German BfR (Federal Institute for Risk Assessment) in which concepts of cost and data sharing – which are missing in the legal text – are discussed. The aim is to lower the barrier for raw material suppliers to submit dossiers to have more substances listed.

EuPIA and the entire food packaging chain still strongly believe that only a European regulation can satisfy the functioning of the European internal market and ensure a uniform level of consumer protection. In principle, the German Federal Government also recognises the priority of a European regulation. Thus, an extension of the transitional period is envisaged should the EU Commission present a corresponding specific regulation for printed food contact materials within this period. A fundamentally revised framework could provide the basis for discussions with the German government for a prolongation of the transitional period. With the Commission currently lagging behind its schedule, the odds are of course increasing that the industry will have to live with the GIO and hence projects, such as the regulatory sand box are of key importance. However, currently an adoption of the new legal framework during the transition period is still possible and hence, EuPIA together with the PIJITF will continue its efforts to urge the Commission to follow its timetable and to adopt the new framework as soon as possible. A double transition, first to the GIO and then to new EU provisions must be avoided.

Switzerland announced major revision

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 the positive list in Annex 10. The so-called part A lists evaluated substances, while part B contains substances, which have not been fully evaluated, but which may be used under certain conditions and if they do not migrate with a detection limit of 10 ppb. Already some time ago the



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Swiss authorities announced that they are planning to completely remove Part B in the future. Since the end of 2022 the details are known: It is planned that non-listed substances may be used, as long as they do not show CMR-properties and do not migrate with a detection limit of 10 ppb. Moreover, the Swiss authorities are proposing a mandatory declaration of compliance for food contact material inks. Although EuPIA is not against such a provision, several details of the draft declaration of compliance need to be improved: The plans currently foresee that also substances, which are used, but do not migrate should be disclosed. On the other hand, known Non-Intentionally Added substances (NIAS), such as impurities do not need to be reported. This marks a significant deviation from the current practice of the EuPIA Statement of Composition, which is problematic from the viewpoint of consumer safety, as well as the protection of confidential business information. Hence, EuPIA in close collaboration with the Swiss national association VSLF are preparing a detailed contribution to the corresponding public consultation. Furthermore, experts from the VSLF are already in contact with the Swiss authorities.

EuPIA's Energy Curing Working Group

This group of EuPIA members, who are involved with the supply of UV and EB curing inks and varnishes, continue to have active discussions on a number of key topics impacting these technologies. This included working with the Photoinitiators Platform (PIP) to fund a study on identifying and quantifying photolysis products from a key photoinitiator, supporting industry assertions regarding the very low potential for migration of such substances. In addition, in response to market demand, work is now underway to revise EuPIA's Photoinitiator (PI) Suitability List, looking to extend the number of photoinitiators listed to include those commercial PIs that are known not to be of concern for food contact applications from existing migration test results and other studies.

Printing Inks and the European Green Deal

The Chemical Strategy for Sustainability (CSS) is an important element of the policy area "Zero Pollution" under the European Green Deal. The last two years saw intense discussions around the CSS from which some new concepts emerged that are likely to shape the regulatory landscape for chemicals in a relevant way. Particularly relevant will be the so-called Generic Risk Approach (GRA) and Essential Uses concepts (ESU). GRA is a misleading term used by the European Commission to de facto introduce more or less automatic hazard-based bans for the most hazardous substances used in consumer and professional products. Although the principle of prohibiting CMR substances from consumer products is already present in the current REACH regulation, the Commission plans to expand this approach to a number of other hazard classes, e.g. Endocrine Disruptors and PBT (hazard classes for which the criteria are still being developed!). Printing inks are industrial mixtures, so one could think that the GRA would not apply; however, it is important to closely follow the developments because printing inks almost always end up in articles handled by consumers, and the Commission is ambitious to also expand the GRA to substances in consumer articles. If the GRA were to be implemented for consumer products and articles, then this would likely result in pressure from the market to phase out certain substances.

ESU is another concept interlinked with the GRA: the Commission plans to ban the "most hazardous substances" unless there are no alternatives and they are necessary for uses deemed essential for the functioning of society. So, along the GRA, substances could end up becoming restricted due to evaluations about the essentiality of their use. The debate around this concept is still open, since the Commission doesn't appear to have an unanimous view on how to define the criteria for the determination of essentiality, let alone on the regulatory instrument

where to place it. The ESU is also concerning because the discussion around essentiality is complex and extremely prone to subjectivity (e.g. some NGO consider any use related to aesthetic and luxury by default non-essential), and also it is all but clear who in the end should decide if a use is essential or not. The Commission is aiming to hand over this burden to the Member States, which is concerning because there is the risk of divergent interpretations.

Interestingly (and somewhat concerningly) the ideas of GRA and ESU are being picked up in discussions of other legislation reviews, which are not directly dependent on chemicals legislation. For instance, the revision of the Food Contact Materials legislation appears to take the direction to incorporate GRA to a certain extent (see above), and a first draft of the Regulation for the revision of the PPWR included a negative list, which is a form of hazard based ban (see below).

The shift to a hazard-based approach, coupled with increased scrutiny about the essentiality of uses (and sometimes products!), is becoming a fix issue in the discussions feeding the regulatory development of various pieces of legislation.

Printing Inks and Circular Economy

Task Force Paper Recycling

All aspects regarding the circularity of graphic paper and fiber-based packaging and inks are in the remit of EuPIA's Task Force Paper Recycling. It organizes the exchange with all relevant stakeholders, for instance via the European Paper Recycling Council (EPRC), which is an industry initiative that 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. In 2021 the recycling rate for paper was 71.4 %, which demonstrates that paper is already a very well-functioning circular economy. The task force also monitors the work of the 4evergreen alliance, where EuPIA is a member of the Industry Association Advisory Board.

The Task Force is also involved in activities related to the different **eco-label schemes**, namely the EU Ecolabel, the German Blue Angel, the Nordic Swan and the Austrian Ecolabel.

Also in 2022, **mineral oils** in publication inks and packaging were an issue on the agenda of several member states. Already in 2009, EuPIA had stressed that although news inks, as any other publication inks, are safe for their intended purpose, they are not designed to come into contact with food, whether direct or indirect. However, if a packaging is produced using recycled paper or board made from printed paper, inevitably printing ink components will be present in the recycled material, and may come into direct contact with the packed food. Under these circumstances, it is the responsibility of those placing recycled paper and board on the market for food packaging purposes to assess any risks associated with this use. Where necessary they should take appropriate measures to ensure that any transfer of substances from the packaging to the foodstuff occurs below acceptable levels, compliant with the requirements of the legal framework.

The draft **German Mineral Oil Ordinance** in principle followed this approach, since it foresaw that food contact materials made from recycled paper and board may only be produced and placed on the market, when a functional barrier ensures that transfer of certain mineral oil components is below a defined threshold. However, quite unexpectedly the Mineral Oil Ordinance failed to achieve a majority in the German Federal Chamber in December 2022, and was therefore not adopted. It is yet unclear, if and how the German government will be able to continue with its plans to regulate mineral oil migration to foodstuff.

On the **EU level** regulatory measures are expected, too. However, also here the Commission is behind its schedule and an opinion of European Food Safety Authority originally announced for December 2022 has been postponed to beginning of 2023.

In 2022, many activities regarding mineral oils were seen in **France**. Already in 2020 the French Circular Economy Law announced that the use of mineral oils shall be prohibited on packaging from 2022 and on prints for the general public from 2025. The details became only known, when a subsequent decree was notified to the EU Commission within the so-called TRIS procedure in 2022. The draft basically foresaw a ban of mineral oils for all ink technologies and products with limit values that are technically not achievable. Also, the draft provided an extremely broad and unworkable definition of mineral oils. Hence, a massive impact on the publication business was expected. However, also packaging inks, which are typically formulated without mineral oils would be affected, due to the extremely low thresholds. EuPIA supported the French national association, AFEI, in its intense activities in France on this issue. Together with AFEI and the network of national associations, EuPIA orchestrated a concerted action across Europe to incentivize the Member States to provide comments during the TRIS procedure, as the French ban would have significant impacts on the EU internal market. Indeed, comments submitted by the Commission and several Member States prompted further discussions in France between industry and the relevant authorities. However, although the national discussions continued, the decree was published in May 2022. The final version of the decree contains significant improvements, but still an immensely high impact is expected, especially on the publication business and many details are still unclear.



A summary of the provisions and the open questions can be found in a EuPIA information note



To solve these issues, AFEI is working in close alliance with the French printer's association and discussions between the French authorities and industry are ongoing.

Task Force Plastics Recycling

The year 2022 marked a cornerstone for the plastic recycling TF as the Commission published its proposal for PPWR (Packaging and Packaging Waste Regulation). One of the main features of this publication was the proposal to convert the PPW Directive into a Regulation. Challenges connected with the sustainability of packaging are nothing new to the printing ink industry and some of the key factors, outlined in the impact assessment report, included the increasing amounts of packaging waste, barriers to packaging circularity, and low use of recycled content in plastic packaging. Furthermore, fragmented national rules reduce the effectiveness of the PPWR policy and endanger the effective establishment of a circular economy. However, the Commission put forward some rules that could endanger the current efforts of the packaging industry, one of them being the inclusion of a negative list. This list contained substances or packaging characteristics that stress eliminating from the packaging value chain. This raised an alarm with various industrial stakeholders as this can impede businesses and efforts towards achieving packaging circularity.

One of the successes that the EuPIA Plastics TF was able to achieve, alongside other industrial stakeholders, was the removal of this list by providing inputs to the Commission inter-service consultation and stressing the need for the following elements:

- a stable and harmonized legal framework that ensures certainty and investment security.
- a level playing field that fosters and encourages achieving sustainability in the packaging industry.
- realizable targets that can be achieved without jeopardizing the existing efforts that the industry is taking toward the availability of quality secondary raw materials.

Another important topic that is in scope of the EuPIA Plastics Recycling TF is the Extended Producer Responsibility (EPR), which is also a hallmark feature under the new PPWR proposal. The EPR scheme basically emphasizes a "polluter pays principle" which is taken over by Member States which can penalize or place stringent requirements to achieve recycling/reuse targets placed under the PPWR. The EPR regulation also introduces a concept called "ecomodulation" which charges the economic operators a fee that is based on the packaging characteristics, and not just a volumetric tonnage placed on the market. This means printing inks that are part of the packaging characteristics can be impacted which might draw unnecessary attention if it hinders the recycles quality of the packaging.

Further, in the light of the EU Circular Economy Action Plan (CEAP), there are stringent measures that focus on improving the overall quality of plastic recycling and curbing wastage. The Task Force covers all the aspects of inks regarding the circularity of plastic-based packaging. One important focus of this group includes monitoring activities around CEFLEX

(A Circular Economy for Flexible Packaging) that bring a wide range of industry stakeholders to represent the full flexible packaging value chain.

Initiatives related to ink behaviour in mechanical recycling and smart testing methodology for ink recyclability are being overseen where EuPIA members are represented under the sub-group 9 of CEFLEX. Similarly, the Task Force co-ordinates the activities around the programme RecyClass, which focuses on the recyclability of plastic packaging and products through the development of recycling methodology and testing methods.

The Task Force constantly monitors the scope of inks in the definitions and interpretation of different national and EU legislation and policies related to plastics. In 2021 the TF published a Q&A on Printing inks and Plastics Recycling, which is available on the EuPIA webpage. Furthermore, a EuPIA Guidance Document on the Single Use Plastics Directive was published.

Environmental Footprint of Printing Inks (EFPI)

Discussions around measuring the environmental performance of many kinds of products have gained momentum in recent years, particularly, after the advent of the European Commission's initiative for a single market for green products and the Environmental Footprint methods. In the past, EuPIA published the virtual ink reference that represents printing inks for all print processes actually in use. This could be used by different stakeholders further downstream as ink input into their life cycle assessment (LCA) for printed matter.

As LCA is a dynamic tool, it requires constant updates so that the methods, data availability and technology representativeness remain valid also if time and progress will change situation and values. In line with this, EuPIA commissioned a working group called EFPI, that actively investigates LCA requirements for printing inks so that the customer base and stakeholders can take account of the impacts arising from inks within their LCA calculation.

To this end, EFPI is involved in activities such as identifying and updating the list of commonly used raw materials in the ink industry and developing Life Cycle Inventory (LCI) for the same, evaluation of different printing technologies under the scope of the LCA framework, monitoring PEF-related activities and their relevance for the printing ink industry, and preparing guidance documents in order to aid the ink industry and its customers to carry out updated and scientifically sound LCA studies.

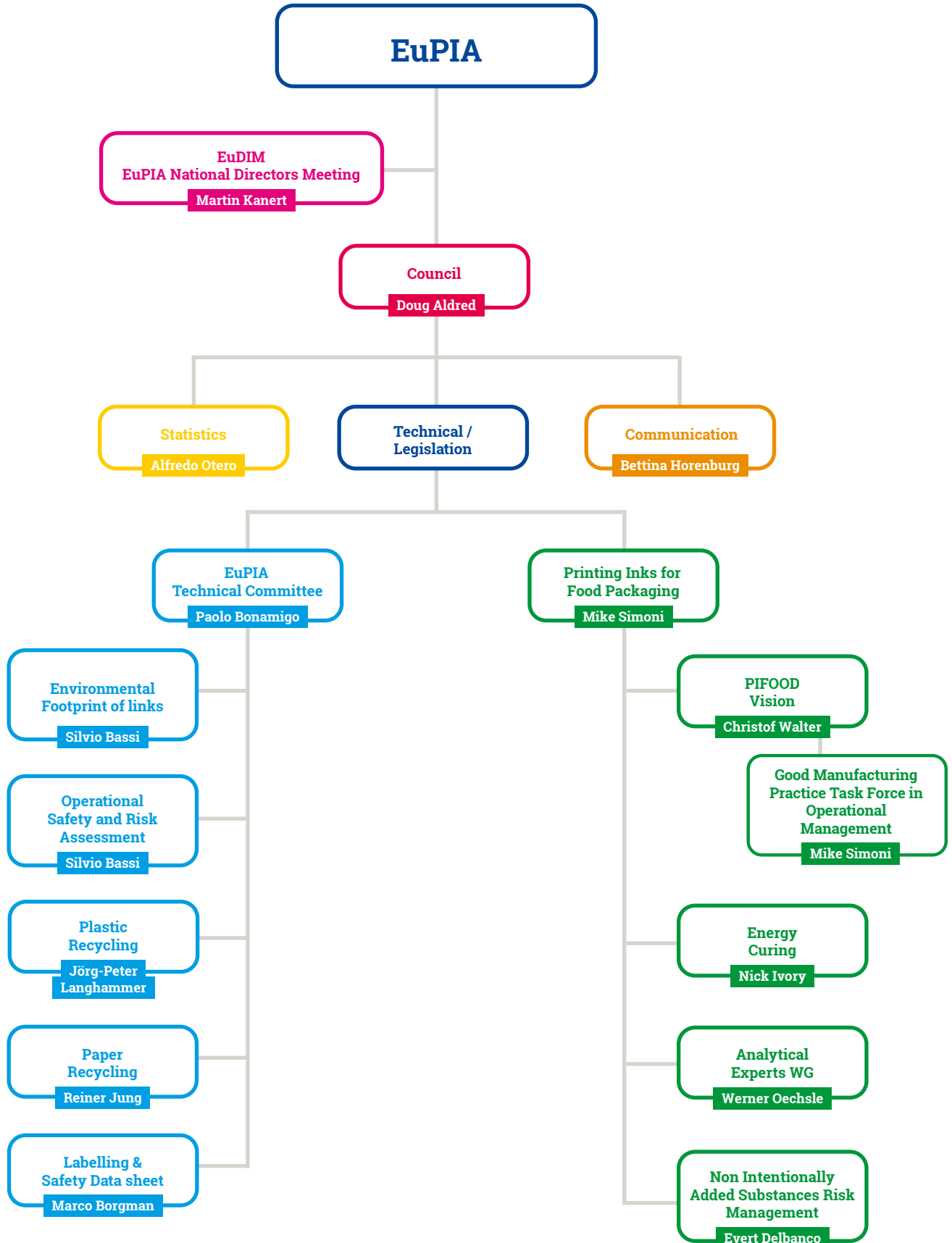
EuPIA's Occupational Safety and Risk Assessment (OSRA) Working Group

The OSRA WG continues to provide a platform for EuPIA members to share knowledge, expertise and experiences relating to occupational safety and accidents in a confidential manner. The OSRA Safety Alerts provide specific details of incidents where lessons can be learned, ranging from fire-risk situations due to e.g. electrostatic discharge, through to possible accidents due to the incorrect operation of Fork-Lift Trucks. Additionally the group continues to work on updating existing guidance and to introduce new guidance for operations management to refer to, sharing best practice approaches, highlighting dangerous situations and specifying how these can be avoided through correct procedures.



EuPIA - Printing inks groups

Situation as of February 2023





Marine Coatings

Biocidal anti-fouling paints are one of the pressing issues among the prime activities for the Working Group in this sector. Some national biocide authorities are very critical with the continued use of biocides, especially in non-commercial use.

The Issue

The activities of CEPE in the field of Marine Coatings lie primarily in issues relating to biocidal anti-fouling coatings, REACH and microplastics.

Some national biocide authorities are very critical with the continued use of biocidal anti-fouling paints, especially on leisure craft. Their agenda – aligned with the general agenda on biocides (see separate article on page 30) – is to reduce the use of biocides as much as possible or to eliminate them from all non-essential uses. In the case of leisure craft the situation reached a point requiring dedicated actions.

The EU regulatory and political environment

For the general regulatory and political environment, see separate article on biocides on page 30.

For several years now, members have applied to obtain authorisation for their biocidal antifouling paints under the EU Biocidal Product Regulation (BPR).

After the approval at EU level of biocide active substances used in products, the formulations which contain them (the biocidal products)

also have to be authorised, after they have been reviewed following an approach set out in guidance issued by ECHA. The time between the submission of the dossiers and the feedback from the relevant national authorities can be up to three years or more. In the meantime, additional discussions with Member States are taking place with regard to the ECHA guidance for performing an environmental risk assessment for anti-fouling paints under the BPR.

CEPE is following these discussions closely in the EU committees and are intervening where possible to ensure that guidance on how to evaluate biocidal anti-fouling products is driven by good science and to ensure that changes in guidance are harmonised across Member States and do not result in legal uncertainty on the investment made to apply for product registration. The dossier cost and the fees required by Member States can easily amount to €500.000 for one paint.

What can we do and how?

The members of the Anti-Fouling Working Group (AFWG) of CEPE are both paint manufacturers and biocide suppliers. The group has been active for a long time on BPR issues and has often engaged with ECHA/European Commission (EC) committees and Member States on

« The time between the submission of the dossiers and the feedback from the relevant national authorities can be up to three years or more »

developments in EU biocides legislation. It has helped decision-makers understand anti-fouling paints, refine risk assessments and has advocated on the benefits of these paints that come from keeping hulls free of fouling such as fuel savings, reductions in air pollution from ships and prevention of translocation of non-native species from one place to another where they may become invasive. The group is now deeply involved in the Coordination Group of the EC and Member States dealing with product authorisation as well as the Biocide Competent Authority meeting dealing with active substances and any other issues linked to the implementation of the Regulation. Those groups are chaired by the EC and are made up of representatives of all member states together with some accredited Stakeholder Organisations (ASOs) like CEPE.


What have we achieved?

The Anti-Fouling Working Group (AFWG) set up a “fast response group” to address issues as they pop up in the ECHA/EC committees and to facilitate discussions within the AFWG.

There has also been an agreement to continue supporting the MAMPEC model, the Marine Antifoulant Model which predicts Environmental Concentrations of biocide in the marine environment for an additional five years. Originally developed in a joint EC/CEPE project, MAMPEC is now used worldwide by regulators evaluating anti-fouling paints. MAMPEC is also being used for exposure assessment in freshwater systems and discharges of chemicals in ballast water. In 2022, CEPE intervened on several occasions in EU meetings to confront the authorities with the reality of the current situation i.e. that authorities have not approved, to date, any product, and should the current approach of using unrefined environmental risk assessment models prevail, there will be no anti-fouling paints approved for leisure crafts. Following the decision of the authorities in 2014 to temporarily still authorise the active substances present in anti-fouling paints, they also agreed that there will be only one date for the renewal of these active substances i.e. 2025 to allow for comparative assessments. To meet the deadline of 2025, the applications for the renewal of the active substances has to start in 2023, but the products containing the active substances have not even been approved yet. This demonstrates once again that the implementation of the BPR is a failure adding to the burden linked to the legal obligation to finalise the review of existing active biocide substances by the end of

2024, some 20 years after the start of the review. For more information on biocides see article on page 30.

What are the remaining steps?

CEPE will continue to advocate for good science to be used as ECHA guidance is developed and when Member States evaluate biocidal anti-fouling paints. We will also emphasise the importance of having the right products to keep ship/boat hulls clean of biofouling to prevent translocation of invasive aquatic species, leading to disruption of biodiversity. In 2023 we hope to see progress regarding environmental risk assessment for marinas and that a solution will be found on efficacy assessment, among other still pending issues. 



Powder Coatings

The Issue

Powder coatings are a key sector for the CEPE community, with a very active Powder Coatings Sector Group (PCSG) meeting regularly to discuss a broad range of issues ranging from the technical challenges through to how to raise the awareness of powder coatings. Although many of the issues are similar to those encountered by other CEPE sectors, there are often certain specific details relating to the substances used, the processes employed in powder manufacturing, the nature of the final product supplied and/or the final application at the powder users that require a platform such as the PCSG, to ensure a common understanding and a common approach to issues throughout the community.

The EU Regulatory and Political Environment

The harmonised classification and reclassification of several substances has had in the past, and continues to have, a key impact on the powder coating sector. While powder coatings have the advantage of zero VOC emissions the challenge remains concerning dust control. The classification of Titanium Dioxide (TiO₂) as a category 2 carcinogen (and also the recent court case annulling this classification) impacted on the sector, whilst the impact of the latest proposed REACH Restriction on the use of Bisphenols (including Bisphenol A (BPA)) is still being assessed. This is needed due to the nature of the specific substances, epoxy resins and intermediates (such as cross-linking agents) used by powder coating manufacturers. Beyond the substance classification issues, the EU Green Deal and Chemical Strategy for Sustainability (CSS) proposals will also undoubtedly have some impact, although powder coatings should be perceived as a solution to the challenges posed (rather than as a problem) – certainly in terms of efficient use of materials and resources, and the durable protection of surfaces outdoors. In addition, the possible regulatory approaches to addressing the issues associated with fine particle / dust inhalation and control will have a direct impact on the manufacture and use of powder coatings, with the focus on occupational exposure and safety measures. However, one major advantage is that powder coatings are manufactured and used only in a well-regulated industrial environment.

What can we do and how?

The PCSG brings together both technical and market experts and senior management, to review and assess the current and upcoming issues, in order to establish common ground and a consensus on how to tackle them. Much of the effort is focused on developing documents such as guidance and position papers in order to support the customer base, ensuring that powder coatings are used correctly and safely, and to address issues such as labelling and Personal Protective Equipment (PPE) use. Powder coating technology has delivered significant benefits over the last 3-4 decades, and will continue to do so with the support of the CEPE community and the PCSG.

What have we achieved?

The CEPE paper on the impact of the classification of TiO₂ was seen as a major achievement for the group, clarifying the reasons as to



why additional labelling on powder coatings was required, and explaining the overall complex situation to customers. Explanations regarding the reclassification of certain curing technologies used in powder coatings have also required a common approach from the sector, especially to ensure continued safe use of certain product lines. More recently, the PCSG has worked together to better understand the possible impacts of the different proposals that have been presented with regard to restricting the levels of BPA in mixtures and articles, including the possible need for migration testing associated with BPA emissions / leaching to the environment.

What are the remaining steps?

The PCSG set up a new working group during the course of 2022, and started discussing how to raise awareness of powder coatings and educate different audiences outside of the sector. This initiative will, at least initially, be focused on legislators and authorities, and is intended to compliment an existing consumer campaign underway in Germany (set up by the VdL's local Powder Coatings group). It is important for the decision-makers, that are taking key decisions on EU chemicals legislation, to be aware of and to understand the possible implications of such decisions on the powder coatings sector, so that the sector can continue to provide the high-quality products and performance benefits required by the key end-user industries such as construction, transportation and furniture. In addition, the PCSG seeks to expand its impact at European level and extend its knowledge by encouraging more national associations to participate in the discussions.





Protective Coatings

The Issue

The issues the Protective Coatings Sector Group follows are addressed in the different sections of this annual report. This section will focus on the activities of the Intumescent Coatings Technical Committee (ICTC). Our principal issue is the voluntary nature of the product standard for these safety critical products. For a long time CEPE members have been advocating the need for a mandatory system to drive up standards in the marketplace, and prevent unnecessary national testing.

The EU regulatory and political environment

Fire resistant coatings have been covered under the EU Construction Products Regulations (CPR) and its forerunner the Construction Products Directive for over 15 years. However, the products are only CE marked on a voluntary basis. Activities in producing new mandates and product standards has been restricted over the last 5 years as a result of the legal ramifications of the James Elliott case, and the subsequent revision of the CPR.

In March 2022, the European Commission (EC) published its proposal for a revision of the CPR. The proposal is now in discussion in the European Parliament and Council and a final text is expected in 2023.

What can we do and how?

The main issue for us remains that the EC is committed to reviewing the existing Acquis documents and Standardisation Requests (Mandates) before moving on to new topics such as fire resisting systems. CEPE ICTC members have discussed this topic with the EC and will continue to do so in 2023 in the hope that we may see some movement on this topic in the middle of the year.

Once that has been done, we will then engage with CEN TC139 to re-commence work bringing our voluntary product standard (EN16623) up to date, and appropriate for use as a harmonised product standard.

« Fire resistant coatings are only CE marked on a voluntary basis »

What have we achieved?

In order to do this, for now, we continue to work on the development of a second version of the CEPE guide to QC text that was initially used as the basis for the 2015 version of EN16623. The new text expands on the original version, and deals with some of the topics such as multiple site of manufacture that were not perceived when the first documents were put together over 10 years ago. A small but committed group of ICTC members is putting this together with a view to publishing the revised guide later in the year.

What are the remaining steps?

The draft guidance document will be presented to ICTC for final approval before publication, and once we have the necessary agreement from the EC and CEN, we will use that text to start the production of the next version of EN16623.

CEPE Board members



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PPG Industries

CEPE Chairman



Martin Beck

BASF Coatings



David Beckford

Pronto Paints



Toon Bossuyt

Boss paints



Andreas Karl Bubenhofer

Bubenhofer AG



Loïc Derrien

Cromology



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Axalta Coatings



Heimer Klokkers

Hubergroup



Michel Kranz

BICCS



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Rachel O'Connor

General Paints Group



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Karthik Ashok Kumar
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Romy Möhrle
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N. A.
Public Affairs Manager

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

National Associations



AIVR – The Romanian Paint Industry Association
www.aivr.ro

Irish Decorative Surface Coatings Association
www.ibec.ie



ASEFAPI – Asociación Española de Fabricantes de Pinturas y Tintas de Imprimir
www.asefapi.es

IVP – Industrie des Vernis et Peintures
www.ivp-coatings.be



APT – Associação Portuguesa de Tintas
www.ap tintas.pt

MAFEOSZ - Hungarian Paint Producers' Association
www.mafeosz.hu



Assovernici
www.assovernici.it

M&L - Maling & Lakkindustriens Forbund
www.norskindustri.no



AVISA
www.avisa.federchimica.it

PZPFiK - Polish Paint & Adhesives Association
www.pzpfik.pl



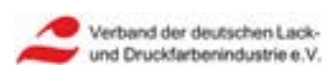
BCF – British Coatings Federation
www.coatings.org.uk

SVEFF – Sverige Färgfabrikanter's Förening
www.sveff.se



DFL - Danmarks Farve- og Limindustri
www.danskindustri.dk/
medlemsforeninger/dfi

VdL – Verband der deutschen Lack- und Druckfarbenindustrie
www.wirsindfarbe.de



FCIO – Fachverband der Chemischen Industrie Österreichs
www.fcio.at

VSLF – Verband der Schweizerischen Lack- und Farbenindustrie
www.vslf.ch



FIPEC- Fédération des Industries des Peintures, Encres, Couleurs, Colles et adhésifs, Préservation du Bois
www.fipec.org

VTY – Värteollisuusyhdistys r.y
www.variteollisuus.fi



Hellenic Coatings Association
www.hellenicpaints.gr

VVVF – Vereniging van Verfen Drukinktfabrikanten
www.vvfv.nl



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