

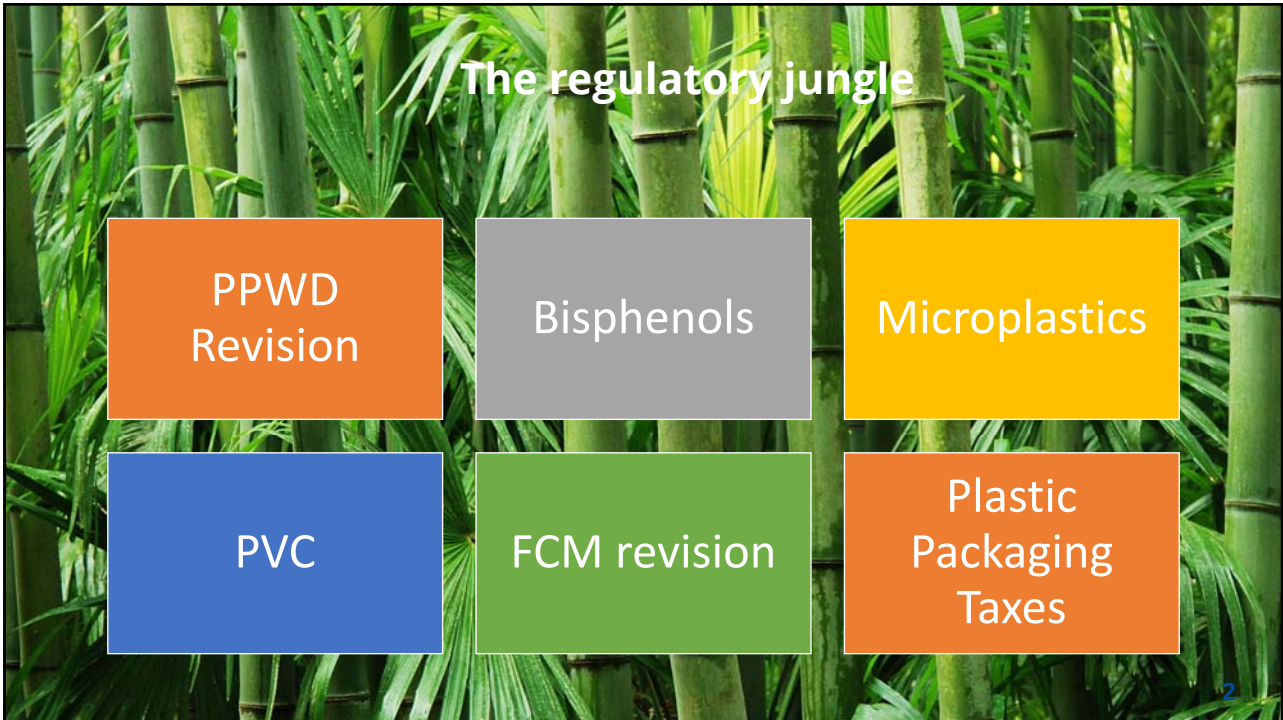


FINAT
Empowering the label industry

Finding a path through the regulatory jungle

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The regulatory jungle

- PPWD Revision
- Bisphenols
- Microplastics
- PVC
- FCM revision
- Plastic Packaging Taxes

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PPWD Revision

- Draft proposal leaked 13 October during EC internal consultation

Regulation

Prevention targets

Reuse/refill targets

Recycled content targets

Recyclability definition

DfR criteria

Recycling at scale


Negative list

Compostable packaging


Harmonized labelling

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PPWR: Key impact self-adhesive labels



- Mandatory compostable labels on fresh fruits and vegetables
 - From 2 years after enter into force
- Aspects to be taken into account for defining DfR guidelines
 - Sleeves, adhesives, colours, material composition
- Negative list
 - Adhesives, sleeves, silicones
- Release liner not explicitly considered packaging

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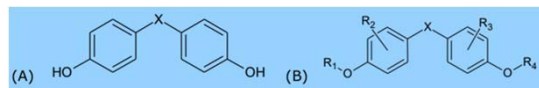
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- Plastic packaging with sleeves covering >50% of the surface
- Plastic packaging with additives changing the material density >1g/cm³
- PVC/PVDC packaging (and labels/sleeves/films)
- Use of inks that do not contain substances of concern (*sic*) and inks that bleed
- PET packaging with non-water soluble / water releasable adhesives at <65°C
- Polyolefin packaging with non-water soluble/water releasable adhesives at <40°C

- Paper-based packaging with plastic components that cannot be separated in established processes
- Silicone/wax coatings
- Insoluble adhesives + hot-melt adhesives with softening point < 68°
- Mineral oil colours and inks that do not contain substances of concern (*sic*)
- Inks/decorative elements using PP/PET metallised laminates, PET-metallised film


- Packaging units will need to be assessed for conformity to sustainability requirements
- Register of producers requiring exchange of information and record keeping for 10 years
- Reuse/refill targets will change users needs and requirements

- Germany [submitted a restriction](#) under REACH for bisphenols
 - Generic group of bisphenols including BPA, BPB, BPS, BPF, BPAF
 - 10 ppm limit for uses in scope:
 - Additive in articles
 - Unreacted monomer
 - Mixtures for industrial and professional use
 - Release during service life
 - Exceptions: bound within a matrix, intermediates, low migration
 - Derogations e.g. paper for recycling, epoxy resins for professional use
- 6-month public consultation expected shortly



- Current status of BPA in FCM
 - Tolerable Daily Intake (TDI) of BPA: 4µg/kg bw = 4000ng/kg bw
 - Last updated January 2015
 - Temporary pending ongoing testing in US (CLARITY-BPA)
- EFSA updating risk assessment of BPA for FCM
 - November 2021: Draft EFSA scientific opinion available
 - January 2022: [Technical meeting](#) with stakeholder and authorities
 - New proposed TDI of BPA: 0.04ng/kg bw
 - Reduction of 100000x!
- Final report expected by end 2022

- FINAT approached by Petcore to investigate potential sources of BPA in PET recyclate
- Suspicion that printed labels on PET bottles could be a source of BPA
- Feedback from FINAT members indicated printing inks as a potential source, but alternatives are available; EuPIA involved
- EuPIA-FINAT statement to phase out use of bisphenol-based resins in inks to print labels for PET bottles
- More activities to follow on this topic




Microplastics

- Draft Regulation with restriction [published 30 August](#)
- Paints and coatings not included in restriction proposal, but
 - Article manufacturers to supply information to users to minimize emissions
 - Users to report key information to ECHA to monitor uses
- EPDLA CEFIC sector group [statement](#)
- REACH committee Dec 2022; Parliament Q1 2023
- Adoption Q2 2023


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PVC REACH restriction

- [European Commission requested ECHA](#) to develop report with intention to study restriction of PVC and PVC additives
- Priorities
 - plasticisers and flame retardants
 - other PVC additives
 - PVC itself
- Scope
 - Complete life cycle of PVC articles, including end-of-life and recycling
- Timeline: report [expected to be published by May 2023](#)


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Food Contact Materials




- European Commission reviewing FCM legislation
- [Staff Working Document for the Evaluation of the FCM legislation](#)
- [Public consultation](#) open until 11 January 2023
- FINAT is evaluating the impact and will prepare feedback as necessary
- Revised FCM Regulation scheduled for Q2 2023

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Plastic Packaging Taxes

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 - In force since 1 April 2022
 - Labels could be in scope if RC < 30%
 - [BPIF prepared excellent material](#)
- 
 - From 1 January 2023
 - Non-recycled content in principle liable for the tax
 - [AIFEC FAQ](#)
- 
 - From 1 January 2023?
 - [GIPEA FAQ](#)

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