

# Résumé

European Resin Manufacturers  
Association Newsletter- 4<sup>th</sup> Quarter  
2016

**EUROPEAN  
RESIN  
MANUFACTURERS  
ASSOCIATION**

## Season's Greetings Message from ERMA Chairman D.Graham

*It is my great pleasure and honour as association chairman and on behalf of executive committee to wish you and your family a joyous holidays season and a new year filled with peace and happiness.*



David Graham, Chairman

As you know, the EU have strict regulations on consumer and environmental protection, occupational health, chemical processes and transport of chemicals. ERMA members as part of the chemical industries are committed to improve the management of chemicals and chemical processes through a combination of voluntary initiatives and specific action programmes, which are central to our Sustainable Development policy.

During this year, the association has taken great steps to enhance our member benefits, by changing the organisation structure with a new Director for association.

We published quarterly résumés and organising actively our annual conference with a series of master classes reports and talks to address a variety of critical issues for our industry and members.

ERMA new organisation objective is to provide the information, guidelines, support and help members to identify the chemical trends. Our annual conference have been organised within this objective and selected topics presented by independent experts demonstrate the complexities of the presented topics.

During our General assembly, we have decided to remain unchanged membership fee for the 3rd successive years.

Finally I would like to welcome again our new members and thank you for your support.

*Wishing you a fabulous 2017 with full of great achievements*

**European Resin Manufacturers Association (ERMA)**

***"The Voice of Resins in Europe"***

## **Study on Harmonised European PCS**

In the context of the legal proposal a study was set up for the design of a European Product Categorisation System (EU PCS).

This is the system which will have to be used by submitters and MS Appointed Bodies/Poison Centres for the implementation of the Regulation.

*In order to have a stable, reliable and fit-for-purpose categorisation system it is of utmost importance that the study coordinator or consultant could receive the feedback from stakeholder "ERMA as stock holder has received a demand from EU consultant (TRASYS) for the feedbacks on EU PCS study, which has been provided".*

The study report (document) gives an overview of the proposition, presenting all product categories including the code, name and definition for each category along with the corresponding REACH Product Category code and definition, where applicable and available.

### **Example of proposition:**

**Table 1-1 : (draft) harmonised European PCS**

EU PCS code	EU PCS Category name	EU PCS Category definition	REACH PC Code	REACH PC Definition	Data submission mandatory by industry
PCP_1.1	Craft and hobby paints	Input useful	PC9a Coatings and paints, thinners, paint removers	Not available	Yes
PCP_1.2.	Artists' paints	Input requested	PC9a Coatings and paints, thinners, paint removers	Not available	Yes
PCP_1.3	Finger paints	Paints for use in play by children, applied using the fingers directly	PC9c Finger paints	Not available	Yes
PCP_1.4	Modelling compounds	Creative modelling/sculpting material for adults or children, such as clays (ceramic, polymeric etc.) <sup>29</sup>	PC9b Fillers, putties, plasters, modelling clay	Not available	Yes
PCP_1.5	Crayons, chalks and pastels	Input useful	Not available	Not available	Yes
PCP_1.6	Media and auxiliaries	Auxiliary artists' materials including carriers/vehicles (such as oils), solvents/thinners, special effect agents, tinting mediums, fast and	PC9a Coatings and paints, thinners, paint	Not available	Yes

## On the category definitions:

- 's-e' means the category title is considered self-explanatory and does not require any further definition or description
- 'input requested' and highlighted in yellow means the category for which we would be grateful to receive as priority input on definitions from stakeholders during the consultation period.
- 'input useful' means the category where additional input can be beneficial, but not urgently needed. Nevertheless, input is as well welcomed on any other definitions and categories.
- 'not available' means a definition of REACH Product Categories is currently not available and input from stakeholders would be useful, but considered of a lower priority than for the EU PCS categories.

## On the legal obligations to notify:

- All categories of the EU PCS are to be used by MS Appointed Bodies/Poison Centres for reporting and exchange of information purposes.
- In the last column it is mentioned if categories are within the scope of mandatory submissions from industry to MS Appointed Bodies/Poison Centres. We would be grateful to receive your comments on whether all relevant categories to be used for mandatory submissions are covered.

In this context, term product refers to hazardous mixtures for which the submission of information by industry to MS Appointed Bodies/Poison Centres is mandatory; however, some product categories also include articles (for example "PCT", Chemicals for technical appliances, processes and products) and substances, (for example "PDF", Food and food additives), as defined in the CLP regulation, which will be used only by MS Appointed Bodies/Poison Centres for reporting purposes and exchange of information.

REACH PC are indicated for informational purpose to a corresponding EU PCS category. However, it must be highlighted that REACH PC are wider and not hierarchically structured, without one-to-one relationship to EU PCS categories.

Links for more information:

- [http://ec.europa.eu/growth/toolsdatabases/newsroom/cf/itemdetail.cfm?item\\_id=8398&](http://ec.europa.eu/growth/toolsdatabases/newsroom/cf/itemdetail.cfm?item_id=8398&)
- ERMA website

## **REACH**

- **Pre-register your low volume chemicals**

If you have recently started to manufacture or import a non-CMR phase-in substance in amounts of 1 to 100 tonnes a year, you can pre-register within six months after starting the activity. However, the last possibility is on 31 May 2017. Pre-registration enables you to continue supplying your low-volume chemicals legally on the EU/EEA market until the registration deadline

**Note:** Pre-registration is only for companies planning to register phase-in (existing) substances. After pre-registration, potential registrants of the same substance can find each other's contact details in REACH-IT, so they can get in contact to agree on the sameness of their substance, form a substance information exchange forum (SIEF), share data and submit a registration dossier jointly.

- **2018 (submit your registration)**

The last REACH registration deadline will be on 31 May 2018. This deadline concerns companies that manufacture or import chemical substances in low volumes, between 1-100 tonnes per year.

ECHA's REACH 2018 Roadmap splits the registration into seven phases and describes the milestones of each phase and support that the Agency plans to give to registrants.

Companies should start their preparations early enough. ECHA's REACH 2018 web pages serve as a one-stop-shop for all material to help companies prepare.

Links for more information: <https://echa.europa.eu>

## **European Chemical Industry:**

Output from the EU chemical industry covers three broad product areas:

- base chemicals,
- specialty chemicals
- consumer chemicals.

**Base chemicals** covers petrochemicals and their polymers derivatives along with basic inorganics. Considered commodity chemicals, they are produced in large volumes and sold in the chemical industry itself or to other industries. Base chemicals in 2014 represented 59.6 per cent of total EU chemicals sales.

**Specialty chemicals** covers areas such as paints and inks, crop protection, dyes and pigments. Specialty chemicals are produced in small volumes but they nevertheless made up 27.8 per cent of total EU chemicals sales in 2014.

**Consumer chemicals** are sold to final consumers, such as soaps and detergents as well as perfumes and cosmetics. They represented 12.6 per cent of total EU chemicals sales in 2014. Petrochemicals and specialty chemicals accounted for the majority – 54.9 per cent – of EU chemicals sales in 2014.

**Economic:** Despite domestic and international economic uncertainty, EU chemical industry exports reached €137.7 billion in 2014. EU chemicals imports from the non-EU area reached €94.2 billion in 2014. This resulted in an EU chemicals trade surplus of €43.5 billion.

**Employment:** Chemical companies in the European Union in 2014 employed a total staff of about 1.2 million. The sector generated an even greater number of indirect jobs – up to three times higher than through direct employment.

Direct employment in the EU chemical industry decreased by an average annual rate of 1.7 per cent from 1997 to 2014. The number of employees in 2014 was 25 per cent less than the 1997 level. While quarterly data shows that the direct employment level has stabilised since first quarter of 2010, the level of employment in the second quarter of 2015 is 9.4 per cent below the peak level before the crisis experienced in third quarter 2007.

According to Eurostat data (2012), employment in the EU chemical industry is particularly high in five subsectors – petrochemicals; paints, varnishes and similar coatings, printing ink and mastics; plastics in primary forms; perfumes and toilet preparations; soap and detergents, cleaning and polishing preparations – all sectors with a significant presence in the EU.

Our industry faces a great and increasing need to attract new talent in the field of chemistry.

Ref.: THE EUROPEAN CHEMICAL INDUSTRY (Facts & Figures 2016) by CEFIC

Link for more information: <http://www.cefic.org/Facts-and-Figures/>

## **ERMA annual conference topics:**

*Thanks to our external experts and speakers, we had a wonderful conference (November 15th in London).*

*Our 1st speaker was Mr. Nick Kernoghan (Independent Food Contact Consultant) and his topic focussed on Food Contact Materials Regulations.*

*In his presentation Nick has offered an independent view and helps to identify the trends and challenge for food industries. ERMA members as raw materials suppliers have to satisfy future market requirements and know:*

- *What regulations apply to our products and what they cover*
- *What could be the next step (non plastics food contact materials)*
- *What we need to check and measure to comply with food contact regulations*
- *What documentation we need to give to our customers*
- *What documentation we need to have ourselves*

**Note:** *If a substance has a restriction by regulation and you don't identify it then you are taking total responsibility for its compliance*

### **Abstract of this presentation:**

*Food contact materials are all materials and articles intended to come into contact with food, such as food packaging and containers, food packaging machinery, kitchen equipment, cutlery and dishes. The safety of food contact materials requires evaluation as chemicals can migrate from them into food. Some of these food contact materials are subject to harmonised EU legislation which sets out what companies need to do to be in compliance. However, a majority of food contact materials are not covered by such legislation leaving companies in the food contact supply chain reliant on diverse national legislation and mutual recognition to show that their products are safe.*

*Plastic materials and articles in contact with food are covered by comprehensive harmonised legislation. The Plastics Regulation specifies permitted substances, restrictions on the use of these substances and sets out rules to determine the compliance of plastic materials and articles. Despite this there are still some issues such as supply chain communications and non-intentionally added substances, which are not well understood. The position for the non-plastic food contact materials, including coatings, paper and board, adhesives, printing inks and rubber, which are not covered by harmonised legislation is even more complex and less well understood. In addition, there are significant differences in the approaches and requirements of the various jurisdictions around the world. As a result, compliance becomes ever more complex and time consuming.*

*For more information : See Nick presentation in our ERMA Website*

## **ERMA annual conference topics:**

*Our 2nd speaker was Dr. Alice Brousse (Independent Consultant from PFA-Brussels "a scientific consultancy") and her topic focussed on Biocide Regulations.*

*In her presentation Alice helps participants to have a better view on biocide regulations processes and issues for treated articles (ERMA members products):*

**Note:** *Articles containing a Biocidal Products for protection is a treated article and do not needs authorisation.*

### **Abstract of this presentation:**

*The Biocidal Products Regulation (BPR, Regulation (EU) 528/2012) concerns the placing on the market and use of biocidal products, which are used to protect humans, animals, materials or articles against harmful organisms like pests or bacteria, by the action of the active substances contained in the biocidal product. This regulation aims to improve the functioning of the biocidal products market in the EU, while ensuring a high level of protection for humans and the environment.*

*The basic principle in the BPR is that a biocidal product (BP) must be authorised before it can be made available on the market or used in the European Union. This takes place in two consecutive steps.*

- *First step: The active substance is evaluated and, provided the criteria are fulfilled, is then approved in a specified product-type (PT). The biocidal products are classified into 22 biocidal product-types.*
- *Second step: The authorisation of each BP consisting of, containing or generating the approved active substance(s). This document concerns the first step, approval of active substances.*

### **Treated articles:**

*Treated articles are any substance, mixture or article which has been treated with, or intentionally incorporates, one or more biocidal products.*

*Under BPR, articles can only be treated with active substances which have been approved in the EU for that purpose. Manufacturers, importers or others who place treated articles on the market may also have to include specific information on labels of the treated articles they place onto the market.*

*In this presentation Alice help participants to better understand:*

- *When do we have to label our products and what information should be included on the label?*
- *What are the challenges for biocidal products or treated articles in our European market*

## **ERMA annual conference topics:**

*Our 3rd speaker was Mr. Pau Huguet (Independent Consultant from ecomatters which is an Environment Trust Consultancy based on NL") and his topic focussed on implications and opportunities for the European green products market.*

*In his presentation Pau helps participants to have a better view on EU Single Market for Green Products, Environmental footprinting, Life Cycle Assessment, and Product Environmental Footprint (PEF).*

### **Note:**

- A green product has a smaller overall environmental footprint (Is your product green ?)
- The environmental impacts must be calculated over full value chain(Life Cycle)
- Communication of product environmental performance is of increasing importance in product marketing

### **Abstract of this presentation:**

*The EU aims for a single European market for green products based on the following problem statement: "A company wishing to market its product as green in several Member State markets faces a confusing range of choices of methods and initiatives, and might find it needs to apply several of them in order to prove the product's green credentials. This is turning into a barrier for the circulation of green products in the Single Market." This is done by establishment of the Product Environmental Footprint (PEF) methodology, which is currently piloted. This method aims to harmonize LCA calculation rules and is expected to be used as a basis for: Requirements for EU Product Eco-label scheme, Green Public Procurement and Resource efficiency directives. Max is part of the EU PEF-Pilot for Paints within CEPE and will present his market outlook. Starting with the interpretation of a green product, then linking this to: LCA, Environmental product labels and other sustainability initiatives within Industry associations (e.g. CEPE and Plastics Europe). The Product Environmental Footprint (PEF) is a multi-criteria measure of the environmental performance of a good or service throughout its life cycle. In his presentation Max will share his experiences as EU PEF-Pilot member and European industry consultant.*

## Events

### ERMA:

- **ERMA 2017 Conference & GA:**  
**Place:** *Nürnberg, Germany (during ECS)*  
**Date:** *Will be communicated asap*

### Others:

- **ECS: European Coatings Show**  
*Nürnberg, Germany : 4. - 6. April 2017*
- **ECHA: Stakeholders' Day (European industry associations and NGOs)**  
*Helsinki: 4-5 April 2017*