



National Institute for Public Health
and the Environment
Ministry of Health, Welfare and Sport

New Council of Europe Ad Hoc WG on Coatings

Els Heyvaert (BE)

Luan Chen (NL)

Bianca van de Ven (NL)



Legislation on coatings

No EU-harmonised material

National rules apply, or article 3 of Regulation no 1935/2004

However:

- > Each MS differs:
 - General rules and restrictions for all materials
 - Categorization of 'types of coating'
 - Rules and restrictions applicable for each type of coating, or type of substrate
- > Not all are translated in English, or CAS nrs available
- > Principle of mutual recognition applies



Enforcement is almost impossible



Set scope of TG

Definition of coatings

- are impregnating agents (waxes, PFAS,...) included?
- a) Set specific guidance for all types?
- b) Restrict to only the main types?
 - If so, which ones?
 - Set general guidance for 'coatings' out of scope?



Existing categorizations of coatings

CoE Resolution / BE Royal Degree

- Coatings for metal packaging
- Flexible packaging coatings
- Heavy-duty coatings /
High performance varnishes

NL Warenwet regeling (future)

- General purpose coatings
- Coatings for specified applications:
 - Wax coatings (solvent free)
 - Metallic coatings
 - Temperature resistant coatings

NL Warenwet regeling (current) :

- Dispersions of macromol. substances:
 - in water
 - in organic liquids
- Dispersions of paraffins & waxes in water
- Solutions: - in water
- in organic solvents
- Solvent-free: - waxes & waxy products
- other solvent-free materials
- Metallic coatings
- PTFE coatings for cooking and baking
- Coatings on Paper & Board
- Coatings on metals
- Impregnation of wood & cork



Agree on categorization

By type of coating?

- organic (polymeric / non-polymeric) / inorganic, ...

By type of substrate?

- For paper and board / metals / organics / textiles / wood & cork / ceramics

By type of use of purpose?

- General purpose / Heat resistant / impregnation
- Single use / repeated use (packaging / utensils)?

Combination of the above?



Documents for input

- > CoE - Policy statement on coatings [v3 feb 2009.pdf](#)
- > MS legislations (see next slide)
- > Report of EFSA Task Force on varnishes and coatings [2019 Zenodo](#)
- > Baseline Study on non-harmonised FCM [JRC 2016](#)
- > CEPE – [CoP's](#) (GMP's and Migration testing Guidances)



MS legislation & Guidance

- Belgium: Royal Degree on varnishes and coatings [2016](#)
- Netherlands: Warenwet Regeling, Chapter 10 of Annex part A [2014](#)
- Germany: [BfR Recommendations](#) XIV, XXV, XXVIII, XLI, XLVIII, LI (?)
- Other MS, according to baseline study JRC
 - CZ: Vyhláška č. 38/2001
 - EL: Greek food code
 - ES: Real Decreto 847/2011
 - FR: BOCCRF n°17 du 15/09/1998, n°08 du 24/05/1996 , Instruction: 30/11/1987
 - HR: NN125-2009
 - IT: D.M. 21/03/1973 (and amendments), DPR n°777 of 23/08/1982 (amended)
 - SK: Foodstuffs Code 1799/2003



Timeline for the WG

- > As from now: Please contact us if:
 - you're interested to participate
 - you have information to share; e.g. link to legislation, guidelines
- > March 2022: Draft architecture of the Technical Guide
- > Beginning of 2023: Kick-off meeting (Brussels) with WG-members
- > 2023: WG open for participants outside CoE Committee on FCM?



Contact

- › Els Heyvaert: els.heyvaert@health.fgov.be
- › Bianca van de Ven: bianca.van.de.ven@rivm.nl
- › Luan Chen: luan.chen@rivm.nl

Thanks for your attention!