

AUDIENCE-LED DISCUSSION WITH PANELLISTS



QUESTIONS SUBMITTED DURING REGISTRATION

- In total, 16 questions submitted already at the moment of registration
- Topic of the questions:



QUESTIONS SUBMITTED DURING REGISTRATION

Questions of EFSA's remit:

Application procedure:

- Step-by-step guidance for entire procedure
- Content of technical dossier (e.g. challenge test), required documentation
- Timelines of the risk assessment

→ Addressed via presentation from FDP and FIP colleagues



QUESTIONS SUBMITTED DURING REGISTRATION

Questions of EFSA's remit:

Scientific issues

- Follow-up to public consultation comments on migration criteria and contamination of final articles produced from rPET (benzene)
- “Which will be the guidelines to follow, according to Reg. 2022/1616, to calculate the percentage of recycled material inside the product sold on the market?”
- “The new EFSA needs are requesting measurements down to 0,00015 mg/kg food simulant. In the recycling plant I can measure material directly, migration is done in a bottle not allowing me to do inline inspection. Most labs are simply not able to measure as low as 0,00015 mg/kg.”



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Questions of European Commission's remit:

- Is it possible to only submit a specific 'recycling process' without a registration of a recycling installation?
- Guidance document which shows step by step ... The recycling machinery/recycling installation registration procedure (RIN, RON, etc.)
- What are the developments concerning the status of third countries recyclers whose national authorities are not providing the support required by the EU?
- How to prove compliance with legislation of the PET content within the packaging (layers of other polymers)?

→ Addressed via presentation from European Commission



Questions submitted during registration

- **Questions of European Commission's remit:**
- How can the 5% non-food plastic input rule be reinvented to accommodate sources of material such as separate collection schemes
 - *by means of the novel technology procedure*
- The recycling facilities must conform with 5% maximum of non-food plastic input. If a first recycler produces non-decontaminated PET flakes, he is not concerned, but the following recycler to decontaminate flakes and transform it into pellet is affected, is that correct?
 - *No, the first recycler (who is not a recycler under the Regulation) will need to ensure its material has the right composition, as the recycler can only check the certificate*
- Availability of case study to understand complexity of actors concerned, or not, within the recycling chain?
 - *no such case study is available to the Commission;*
 - *there should not be a need in practice; the Regulation was drafted to cover all situations*
- Any specific condition or regulatory discussion going on regarding bio-degradable FCMs?
 - *No, no need; plastic to be authorised under Regulation (EU) no 10/2011; recycling via novel technology procedure*

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Questions of European Commission's remit:

Novel technologies

- How to speed up processes to allow novel technologies and food grade for polymers other than PET?
- Uncertainty around validation of novel technology:
 - how is the technical data sent for evaluation being screened?
 - Is there going to be an interactive communication on the data interpretation?
 - Much is invested in creating data but more details are needed with respect to how good this representation of this data is
- Any changes in the list of specific NIAS? Any updates on standards to measure NIAS?

→ Addressed via presentation from European Commission

