

Initiative on ceramics and vitreous FCMs



What we know - Issues

- Non-compliance mainly imports and some EU traditional/artisanal produced articles
- Some traditional articles can no longer be produced, we just do not know how many and how severely (closure, produce something else, impact on sales and consumers).
- Traditional producers = value from materials used. Can replace but lose selling pitch & cannot compete with cheaper imports.

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What we know - Impacts

Study

- SMLs will severely affect industry, regardless of any mitigation.
- Rough estimates of costs and impacts or not possible for indirect impacts
- Could not differentiate impacts of different mitigating provisions

MS controls, monitoring & JRC data

- 2020 and 2019 monitoring data
- LT + NO, AT, DE data from 2009-2011
- JRC

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IA study issues

- Very difficult to obtain data, in particular quantitative data on costs and impacts
- Low response rate. Majority of ceramics, few enamel, glass and crystal. Mainly EU associations and larger industries.
- Difficult to reach artisans – individual/micro businesses including hobbyists, lack of interest in what happens at EU level, rely on national legislation, trust raw materials to be compliant, not only food contact.
- More concerned about the proposed SMLs and testing requirements (cost, third migration) than mitigating measures. Limited input and low interest in mitigating provisions, not seen as acceptable or useful since there are no substitutes

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What we know – Mitigating provisions

- Conclusions:
 - Most producers rejected any reduction/new SMLs as cannot meet them regardless of any mitigating provisions
 - But most would make slightly higher SMLs (e.g. derogations)
 - None of the mitigating provisions were acceptable by industry
 - Option 3/a defining stricter information and quality control requirements on the supply chain may help artisans and hobbyists
 - Study recommends consulting again with industry on possible solutions

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Next steps

- Chemical Strategy for Sustainability → Discussions ongoing. But likely CMRs will be banned unless for « essential use ».
- FCM revision → Impact assessment work start Q1 2022 – end Q1 2023.
- Any measure on ceramics will need integrating into future FCM framework.
- Consultations, info and research gathered on the specificities of artisans and SMEs will inform work on the FCM revision to address

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We need

- But beyond that, we welcome support on:
- Information on SMEs and artisans/traditional production in EU MS.
- Dialogue with those SMEs and artisans/traditional producers
- Ways to protect EU traditions and artisans
- Compliance and enforcement for SMEs and artisans/micro.

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