

## Consultation strategy

### Who are we consulting?

To support this process, the Commission will continue close dialogue with all relevant stakeholder groups. This includes the ceramics and glass industries including businesses representing artisanal and traditionally produced articles, professional associations, citizens and consumers, relevant NGOs, as well as national competent authorities and relevant EU bodies.

A first stakeholder mapping indicated that the stakeholders most likely affected by this policy initiative are:

<b>Group</b>	<b>Description</b>
<b>EU citizens and consumers</b>	As this initiative aims to improve the safety of ceramic and vitreous FCMs, citizens and consumers should be consulted and can provide useful insights to the impact assessment on e.g. their use of ceramic and vitreous articles, knowledge of issues, purchasing preferences.
<b>Individual business operators</b>	This includes both larger producers of ceramic and vitreous (glass, enamelled metals and crystal) food contact materials and SMEs. For example, Villeroy & Bosch or BHS Tabletop AG.
<b>Professional associations</b>	Cerame-Unie and Glass Alliance Europe represent the ceramic and glass sectors respectively at EU level. Some sectoral organisations also exist, e.g. European Container Glass Federation (FEVE) or European Federation of Ceramic Table-and Ornamentalware (FEPP). This includes also national associations such as the Confédération industries céramiques de France and the Austrian Enamel Association. Particular attention will be given to professional associations that represent SMEs and micro enterprises. Other professional associations includes those representing any relevant parts of the ceramic and vitreous FCM supply chain such as suppliers, importers and the food industry.
<b>Artisans and hobbyists</b>	This includes hobbyists, handicraft and micro-sized businesses producing ceramic and vitreous articles in an artisanal way. Some national and regional artisan organisations exist such as Organización de los artesanos de España or Atelier d'art de France (national) and Associação de Artesãos da Serra da Estrela e Região Centro de Portugal or Arts & Crafts Association Bornholm (regional).
<b>Producers of articles of cultural or traditional value.</b>	These producers are may be independent or members of producer associations such as the Associazione Italiana Città della Ceramica (IT) or the Craft Potters Association of Great Britain (UK). Such producers may be geographically spread out, where they represent the different countries local, regional or national cultures and tradition.
<b>Governmental national authorities</b>	Member state competent authorities for food contact materials and other public bodies involved in the implementation and enforcement of FCM legislation: <a href="https://ec.europa.eu/food/sites/food/files/safety/docs/cs_fcm_auth_ref_en.pdf">https://ec.europa.eu/food/sites/food/files/safety/docs/cs_fcm_auth_ref_en.pdf</a> .
<b>EU institutions, bodies and agencies</b>	This includes the Joint research Centre of the European Commission in its capacity as EU Reference Laboratory (EU-RL) and relevant agencies such as the European Food Safety Authority (EFSA) in their capacity as the risk assessor at EU level.
<b>NGOs</b>	Non-profit, non-governmental organisations (NGOs) with a public interest in this initiative.

Available data shows that traditional and artisanal produces articles and cheap imports can release more heavy metals than industrially produced wares. Also smaller artisans and traditional producers are expected to difficult to reach and may not be aware of EU legislation or that a new policy initiative potentially affecting their work is under development. Hence, particular focus will be given to those **artisans and producers of traditional and cultural wares**, likely to be most affected by the new limits.

### What are we consulting about?

1. **To gather views on the effectiveness, acceptability and feasibility of the mitigating provisions** to reduce the negative effect of the new limits for industry but also public authorities, and **focusing on artisans and producers of traditional wares**,
2. **To complement possible information gaps** in the impact assessment, focusing on socio-economic consequences of updating the limits for industry, smaller producers but also consumers and all relevant stakeholders.

In particular, the consultation activities for the impact assessment will seek to gather information on (non-exhaustive):

- **Socio-economic impacts on stakeholders of introducing lower limits for lead and cadmium and new limits for aluminium, arsenic, barium, cobalt, chromium and nickel.** This includes current and expected increase in compliance costs (e.g. more testing needed, additional metals to test, more expensive materials, change of material or production process, equipment) and the effects on production costs, revenue, pricing of articles, production volumes and type of articles produced, impact on SMEs and micro businesses.
- **Industry information including on the supply chain.** Such as the proportion of affected articles, whether alternative materials and production methods are available, structure of the supply chain and how information is exchanged along it.
- **Effectiveness and feasibility of measures to reduce the likely negative socio-economic impact on industry:**
  - Increased quality control standards:* current quality control processes used and additional cost or burden from applying stricter quality control of materials – e.g. determine and control the composition of materials, analytical methods, traceability, communication and labelling, effect on reducing testing needed, how artisans and producers of traditional articles source their materials and whether composition and control of materials is known and/or checked.
  - Transition plans:* average time needed to compensate for major initial investments (equipment, change in production), effect on sales of labelling, how to effectively inform consumers on the labelling and use of articles.
  - Measure to safeguard traditional and artisanal products:* whether higher limits would allow artisans and producers of traditional articles to continue marketing their articles, effect on sales of labelling, how to effectively inform consumers on the labelling and use of articles.

### How are we consulting?

The following consultation activities are currently planned:

1. **Public consultation.** Open to all stakeholders, the aim will be to complement information gathered through the study and check the views of stakeholders on the developed policy options and measures to support industry. It will run for a minimum of 12 weeks.

2. **Study supporting the impact assessment:** under a contract, the consultant will conduct targeted consultation activities to gather concrete data on the impact of the new limits on stakeholders and the mitigating provisions. This includes one-on-one interviews with industry, dedicated meetings with artisans, producers of traditional articles, focus groups with industry associations and Member States competent authorities, and an online survey open to all stakeholders.
3. **Targeted interviews and meetings** with industry, national competent authorities, EU bodies and agencies.