Materials and Products in Contact with Drinking Water

Update on the 4 MS process – How can the 4 MS-initiative support the revision of article 10 DWD?

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Overview

1. 4MS PROPOSALS FOR REGULATING MATERIALS IN CONTACT WITH DRINKING WATER
   1.1 Metallic Materials
   1.2 Organic Materials
   1.3 Cementitious Materials

2. REVISION OF ART. 10 DWD

3. CONSTRUCTION PRODUCTS
1.1 Metallic Materials

Results:

• Common acceptance procedure available

• Common Composition List (Positive List) for metallic materials available,
  – Testing according EN standard (min. 0.5 year, expensive)
  – Regular Updates with addition of new compositions

• Approach implemented through national Regulations in NL and D
1.1 Metallic Materials

Product test:

• Compliance test with the composition list
  – Test of the composition (in this case of metals simple)
  – No migration test required
1.2 Organic Materials

- Common procedure for the acceptance of starting substances available
  - Based on EFSA principles for food contact materials

- 4 MS lists available, principle accepted by all (just published)
  - Core list (Confirmed Substances)
  - Combined list (Substances of all 3/4 MS under revision)
  - Obsoletes’ list (Obsolete substances)

- Transfer of the substances to Core List in process
  - Opinions according to 4MS Common Approach necessary (inter alia based on EFSA)
  - Opinions prepared by MS / Input by industry required
1.2 Organic Materials

Obstacles:

• For “older” substances not all the information is available

• Information to be provided with the opinion is under discussion (re-evaluation by all MS is not efficient)

• Costs
## 1.2 Organic Materials

### Product tests:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Test method</th>
<th>Nationally implemented</th>
<th>Harmonized 4MS Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Migration of PL substances</td>
<td>EN 12873 series</td>
<td>D, NL F in preparation UK (test method)</td>
<td>Conversion and requirements agreed</td>
</tr>
<tr>
<td>Migration of TOC</td>
<td>EN 12873 series + EN 1484</td>
<td>D, NL, UK F in preparation</td>
<td>agreed</td>
</tr>
<tr>
<td>Odour / Flavour</td>
<td>EN 1420</td>
<td>D, F, NL UK in preparation</td>
<td>to be defined</td>
</tr>
<tr>
<td>Enhancement of microbial growth</td>
<td>EN 16421 (3 methods)</td>
<td>D, NL in preparation</td>
<td>to be defined</td>
</tr>
<tr>
<td>GC-MS-Screening</td>
<td>EN 15768</td>
<td>F, UK</td>
<td>to be defined</td>
</tr>
<tr>
<td>Further parameters?</td>
<td></td>
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<td></td>
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</tbody>
</table>
4MS Proposals

1.3 Cementitious Materials

Results:

- Common procedure for evaluation of cementitious materials available

- 4 MS Admixture Transitional list (summarizes substances accepted in one of the 4 MS) published in 2016

- National Implementation: (D, UK, NL) in part, F in preparation
1.3 Cementitious Materials

Open Issues:

• Common Positive List

• National implementation of the common approach

• Recognition that cement based products tend to be local in origin
Revision of Art. 10 DWD

• Strong need for revision of article 10

• The precautionary principle and the minimisation request must be kept

• Reference to a separate regulation on materials in contact with drinking water. Legal instrument (e.g. EC regulation or Annex to DWD to be updated as delegated act) must be flexible and allow changes without time consuming bureaucracy and with participation of MS and consultation of industry

• Content: regulatory definition of variable test conditions, pass/fail criteria for all tests, positive lists of starting materials and individual groups of materials, provisions on assessment of formulations and assembled products, definition of non-relevant parts or products within supply systems

• Mandatory use of available EN standards

• Attestation of conformity according to CPR 1+ System
Construction Products

European Legislation - Proposal

**DWD**
- Drinking Water Quality
  - Art 10: Basic requirements

**DW-Material legal provision**
- Hygienic fitness of materials in contact with DW

**CPR**

**Other Product Directives**
Conclusion

• Art 10 with fixed general requirements to be revised, reference to a flexible legal instrument containing all regulatory provisions incl. positive lists etc.

• National authorities of the 4MS will support the Commission
  – Prepare opinions for the evaluation of substances/materials

• 4MS proposals for regulating materials in contact with drinking water available
Thank you for your attention

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http://www.umweltbundesamt.de/en/topics/water/drinking-water/distributing-drinking-water/approval-harmonization-4ms-initiative