**Metal Packaging Europe – Chrome-Free WG**

Conference call

23 February 2022 – 14:30 - 15:15

Attendees (MPE): Giovanni Cappelli (ANFIMA), Laurent Leucio (Eviosys), Stefan Hirth (Crown), Romeo Pavanello (MPE), Erich Stocker (Silgan), Paul Hill (Trivium Packaging), Niko Tessin (VMV), Axel Schulte (Envases), Rita Resende (Colep), Stuart Falconer (MPMA), Antonino Lo Piccolo (Pelliconi), Véronique Monneraye (Massilly), Raffaele Morelli (Pelliconi), Franck Flécheux (LEREM)

Attendees (APEAL): Stefano Maggi (Acciaierie d'Italia), Ruaidri MacDomhnaill (APEAL), Eric Brasseur (ArcelorMittal), Pascal Fabrègue (ArcelorMittal), Edward Span (Tata Steel), Anika Szesni (thyssenkrupp), Peter Vranec (U.S. Steel Košice) David Bogdan (U.S. Steel Košice), Luca Terrile (Acciaierie dItalia), Benito Quentin (ArcelorMittal), Matthias Ihme (thyssenkrupp)

Attendees (lacquer producers): Sylvain Charuel (Akzonobel), Heiko Hachmann-Thiessen (Henkel), Rey Meritxell (Akzonobel)

Legal Counsel: Jan Bocken (Eubelius)

**MINUTES**

1. **WELCOME & RECOGNITION OF ANTITRUST GUIDELINES**

* All attendees confirm that they have received and read the notice about competition rules (“Metal Packaging Europe’s do’s and don’ts”) and that they are in full agreement with these (see attachment 1).

1. **AGENDA & OPENING COMMENTS, APPROVAL OF THE MINUTES OF THE PREVIOUS MEETING & RECAP OF AGREED ACTIONS**

* Romeo Pavanello (MPE) presents the agenda (attachment 2) and informs the WG that the meeting is recorded in order to facilitate the drafting of the minutes. The agenda, as previously circulated, is unanimously approved.
* The WG unanimously approves the minutes of the previous meeting on 28 October 2021 (attachment 3).
* Romeo Pavanello reminds the WG about the actions agreed at the last meeting (see status in blue):
  + The list of failure descriptions will be extended. New list: adhesion loss **and/or** **blistering**, corrosion, detinning, feathering, tin sulphide staining **and/or** **sulphuration**, or other.
  + If insufficient input is provided, it can be envisaged to group the different subcategories of the Aerosols Non-food product group into one category. This was implemented.
  + A segmentation for Milk Infant Formula will be included in the matrix (Milk infant Formula: Powder and Milk Infant Formula: Liquid). This was implemented.
  + MPE will reach out to crown cork producers in order to see whether they can provide additional pack test input. Crown cork producers have been contacted via national associations; no pack test results provided this time. A new attempt will be made.

1. **UPDATE ON REACH AUTHORISATION PROCESS & WAVE 2 APPLICATION**

* Romeo Pavanello asks the APEAL representatives whether an update can be provided on the status of the REACH authorization process and, in particular, on the WAVE 2 applications given that the last update dates from April 2021. Ruaidri MacDomhnaill comments that the update unfortunately is limited given the fact that the process is still ongoing and that for most of the companies there are no decisions yet on the WAVE 2. It is restated that all the APEAL members will be applying for WAVE 2 to ensure a Review Period until the end of 2027 and that they are confident to obtain the authorizations. APEAL also will timely inform MPE when the public consultations are launched allowing the MPE members to submit their input. It also is observed that the long duration of the process is normal and explained by the complexity of the process.
* Romeo Pavanello informs the WG of the MPE question (of 10/02/2022) to APEAL regarding the possible, and previously announced, gradual switch as from mid-2025 of the production from 311 to CFPA. In particular, the question was raised whether that timing is still maintained or whether it could take place before 2025. Romeo also shares the written response that was received from APEAL. With respect to timing, APEAL indicates that while some lines may still be in a position to produce 300/311 up to 2027, overall capacity is likely to be reduced to allow for the transition to CFPA. Considering also that not all product categories are dependent on 4 years pack test, certain volumes may be switched well before 2025 following their validations. Ruaidri MacDomhnaill further comments that APEAL, of course, cannot commit its members to a particular course of action in terms of product availability. This will be up to the individual members to decide. That being said, it is likely that there will be a gradual shift to CFPA from 300/311 to ensure that there is sufficient capacity to cover the increasing demand for CFPA and allowing sufficient time for the individual companies to take the necessary investment decisions to add additional CFPA lines. The question also is raised whether the industry needs to be able to demonstrate progress and that it will be able to successfully shift to CFPA. APEAL responded that the matrix was a sufficient tool for this at this point in time.
* Romeo Pavanello asks APEAL whether there is an update planned of the publicly available Chrome-Free Q&A. Ruaidri MacDomhnaill comments that some additional high-level point can be added based on the APEAL response to the MPE question of 22/02/2022, promoting more B2B discussions.

1. **UPDATE ON Q4 2021 PACK TEST RESULTS**

* Romeo Pavanello and Jan Bocken (Eubelius) give an overview of the qualification matrix for Q4 2021 (see attachment 4).
  + Romeo Pavanello reminds the WG that the goal of the matrix is to foster the exchange of information at B2B level – because single cases cannot be discussed in the WG – and to keep all relevant stakeholders involved and informed. The ultimate goal is to show that a solution to failures can be found. In that case, the colour code of the test results will eventually change from red to green.
  + Romeo Pavanello reminds the WG that the matrix has two dimensions. First, a colour code. The red cells indicate unacceptable qualification results vs. the VS 311 standard and is subdivided in three subcategories (see slide). The orange cell refers to a defect vs the 311 standard. Finally, the green cell indicates that the CFPA is equivalent or better than the 311 standard. Recently, a new dimension was added in the matrix, referring to the percentages of failed and successful pack tests. The percentages have been calculated only when at least 3 can-makers provided data for each packaging and product category. Cells have been blurred (see grey cells) when this condition was not fulfilled. Consequently, the qualification matrix for Q4 2021 does not provide a complete overview of the current situation. It also is reminded that the percentages do not represent the production volumes.
* Discussion with the WG:
  + Romeo Pavanello reminds the WG that the information in the table is confidential.
  + Jan Bocken comments on the results of the new matrix. Due to the fact that more submissions have been received, it was possible to provide additional information on the General Line, Other category (previously not available). In addition, the decision to group the Aerosol Non-food subsegments into one large category also allowed to present results for that category. For two other categories, however, insufficient information was received. Accordingly, this quarter it is not possible to present results for the Food categories Ready Meals soup and Fruit. For some categories previous quarter results had to be included in order to able to present new results. This is the case for the Fish Food category. The other categories are based on new submissions. Jan Bocken observes that when previous quarter results are included this, of course, to some extent distorts the view on the actual situation.
  + Jan Bocken indicates that the most representative categories, for which most test results were submitted, are: the different Food vegetable categories, Ready Meals Meat and Milk Infant Formula Dry. For other categories the number of reported tests is much more limited.
  + Ruaidri MacDomhnaill observed by the WG that, for the first time, for the General Line category, a Red 3 category result is presented. Jan Bocken indicates that this is based on a very limited number of test results. It is not possible, however, to provide additional information in order not to disclose individual company data. Jan Bocken also indicates that some companies do not always complete all cells of the table which means e.g. that for some reported failure modes the relevant coating type or the time of occurrence is not reported. This inevitably leads to an incomplete view.
  + Laurent Leucio observes that a certain stagnation in red category results can be observed (approx. 10%). The participants that have reported red category results and, in particular, red 2 and red 3 categories are invited to contact their relevant suppliers on a B2B basis in order to be able to understand and correctly address the issue.
  + Eric Brasseur raised the question as to why for some categories the table “completed” indicates both completed and not completed. Jan Bocken explains that for some respondents the response is “Yes” while for others “No”. The column combines all inputs that have been received. Some participants observe that this column possibly is too detailed in view of the purpose of the matrix which is to track the evolution of the test results from quarter to quarter.

1. **AOB & NEXT MEETING**

* The next Chrome-Free WG will take place in week 16, 17 or 18 (doodle to follow).

1. **SUMMARY OF AGREED ACTIONS**

* On the matrix methodology:
  + The participants are invited to complete as much as possible all cells of the table.
  + Participants that reported red 2 and red 3 categories are invited to engage in B2B discussions with the relevant suppliers.