



Bundesministerium  
für Gesundheit

Umwelt   
Bundesamt

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?

Birgit Mendel  
Federal Ministry of Health, Germany

Thomas Rapp  
German Environment Agency



Ministerie van Infrastructuur en Milieu



Bundesministerium  
für Gesundheit

## 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

### Results:

- 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:

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



## 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

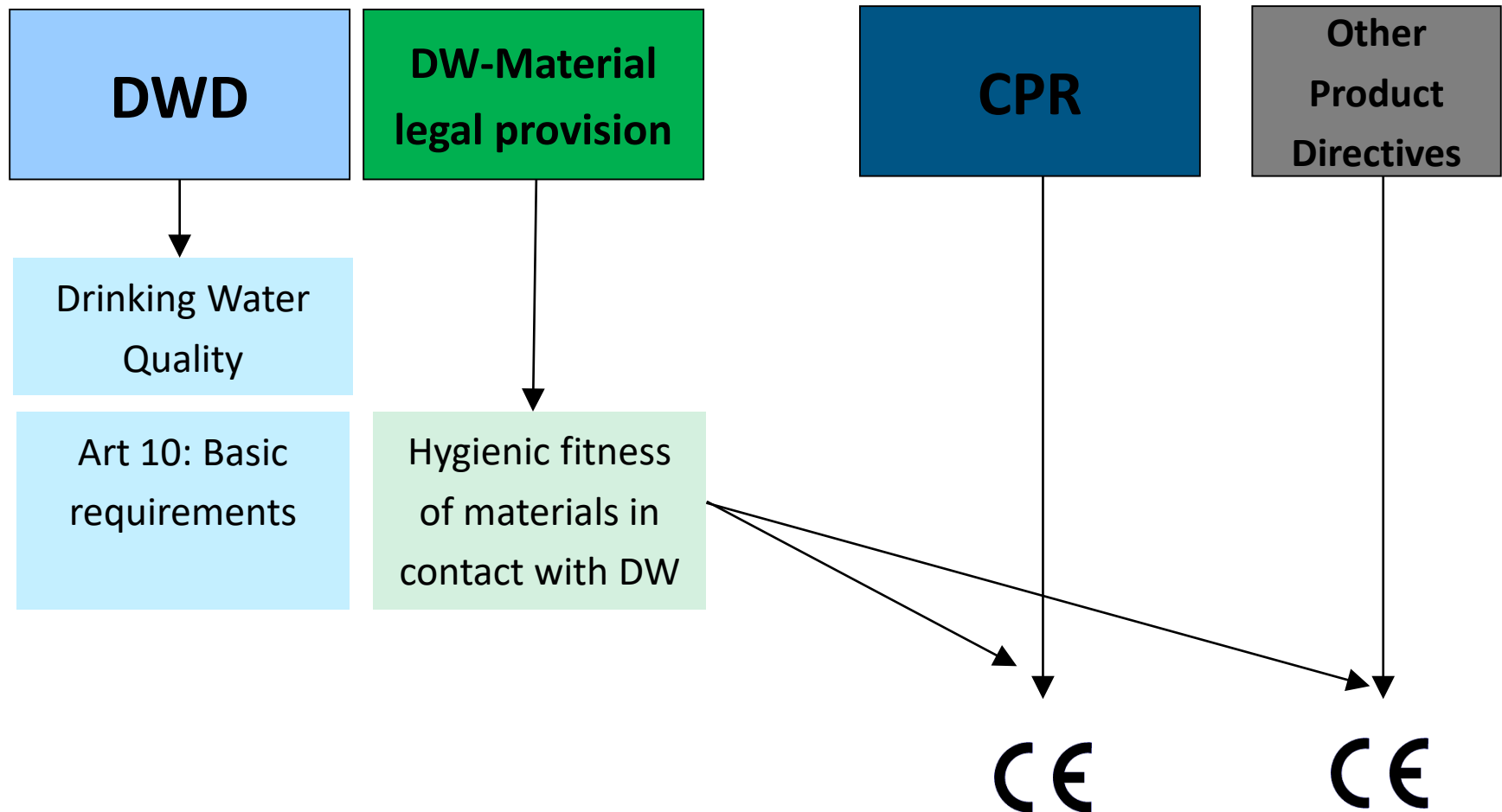
### Open Issues:

- 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**

# European Legislation - Proposal



## 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



Bundesministerium  
für Gesundheit

Umwelt  
Bundesamt

# Thank you for your attention

Birgit Mendel  
Thomas Rapp

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