1 Introduction

Glass fibres are used as fillers in organic materials in contact with drinking water. These are coated with sizing agents to ensure better processability. Formulations of sizing agents contain a variety of constituents. To date, constituents of sizing agent formulations have been insufficiently considered in existing positive lists of the UBA guidelines.

For evaluation of sizing agent formulations for glass fibres in organic materials and products in contact with drinking water reference has been made to the BfR Recommendation LII. Fillers (https://bfr.ble.de/kse/faces/resources/pdf/520-english.pdf) so far. This national recommendation applied to plastics in contact with food because the substances of the sizing agents did not have to be included in the European positive list of Regulation (EU) No. 10/2011. Since 31/12/2015, however, formulations for glass fibre sizing agents must comply with Regulation (EU) No. 10/2011. This is why EFSA published a proposal on how the formulations can be evaluated within the framework of Regulation (EU) No 10/2011; see http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2015.4168/epdf.

This proposal cannot be implemented for materials in contact with drinking water because evaluation of the complex formulations is laborious and risk assessments of the industry cannot be combined with the existing certification system for materials in contact with drinking water.
2 Transitional regulation

In order to continue allowing product manufacturers of glass-fibre-reinforced organic materials to obtain test certificates to prove the drinking water hygienic suitability according to the German Environment Agency’s guidelines, evaluation of the glass fibre sizing agent formulations may rely on the processing aids listed in Section 2.2 of the BfR Recommendation LII. Fillers in addition to the existing positive lists of the respective guideline. Unlisted substances shall be evaluated according to the De Minimis Guideline. It must be demonstrated that the substances used cannot pass into drinking water (with a detection limit of 0.1 µg/l).

This transitional regulation is valid until the entry into force of the Evaluation Criteria Document for plastics and other organic materials in contact with drinking water (KTW-BWGL) and exclusively for products with currently valid KTW and W270 test certificates.

For newly developed products in contact with drinking water or new sizing agent formulations, evaluation of the formulation constituents is carried out

- for listed substances according to the existing positive lists of the Evaluation Criteria Document for plastics and other organic materials in contact with drinking water (KTW-BWGL) or the Elastomer Guideline or the TPE Transitional Recommendation,
- and for non-listed substances according to requirements laid down in the Evaluation Criteria Document for plastics and other organic materials in contact with drinking water (KTW-BWGL) or the De Minimis Guideline, see https://www.umweltbundesamt.de/en/document/de-minimis-guideline.

Applications to list the starting materials for sizing agents according to the rules of procedure of the German Environment Agency for the management of the positive list of starting substances for organic materials in contact with drinking water (https://www.umweltbundesamt.de/en/document/rules-of-procedure-of-the-german-environment-agency-0) may be necessary.

The transitional regulation is intended to give the affected manufacturers in the supply chain sufficient time to test the complex sizing agent formulas for their suitability for the production of materials in contact with drinking water, to potentially develop new formulations for sizing agents, and to make the necessary applications for listing the base materials for sizing agents.

3 Issuing of test certificates

Products whose sizing agent constituents have been evaluated in accordance with this transitional regulation may be given a test certificate entitled “Test certificate according to ... -Guideline (glass fibre sizing agent according to transitional regulation)”.

Test certificates based on this transitional regulation become invalid by 21 March 2021.