Report of the 4 Member States Initiative (4MSi) for 2019

The 4MSi is a group of European nations working together to recognise each other’s approvals for products and materials used in contact with drinking water and to harmonise requirements for the testing of such products and materials. The ultimate aim is to minimise the burden of testing on manufacturers of products and materials that are used in contact with drinking water and at the same time ensure drinking water quality is maintained.

The 4MSi is led by a Joint Management Committee (JMC) comprising regulators from each nation. During 2019 the JMC held three meetings; in Brussels (January), Copenhagen (May) and Berlin (September). 2019 was the first full year that Denmark participated in the 4MSi along with the founder members France, Germany, the Netherlands and the UK. Much of the discussion of the JMC revolved around understanding the proposal to recast the EU Drinking Water Directive and, in particular, the provisions of article 10a. Individual members of the JMC were involved in the formal process to revise the Directive as technical representatives of their respective Member States. Informal discussions were held between the JMC and representatives from the Commission (COM) to facilitate a mutual understanding of the COM proposals for article 10a and the 4MSi proposals under its various common approaches.

The work of the 4MSi is done through a series of sub-groups that report back to the JMC. A short summary of the work of each sub-groups is given below.

**Sub-group on metallic materials SG-MM**

The sub-group updated part A of the 4MS Common Approach on 14th October 2019 to include the possibility to assess passive metallic materials with a test according to EN 16056. In addition, the composition list (Part B of the 4MS Common Approach) was updated twice (5th March 2019 and 14th October 2019). The following materials were introduced after assessment:

- Tin plating of all accepted copper alloys
- Ni5STi45
- CuZn30As (CW707R)
- CuZn35AlSiFe

**Sub-group on organic materials SG-OM**

The sub-group met twice in 2019. Five opinions were finalized that resulted in positive decisions for inclusion of substances into the Core List; another five opinions are still under consideration or have been put on hold as further information was requested. A second revision of the Core, Combined and Obsolete Lists of substances for use in organic materials has been published on the website of 4MSi last September.

The SG-OM has started drafting a document in order to arrive at harmonized methods for product testing (“Common Approach on requirements and testing of products”), but the document is not yet finished. In addition, SG-OM provided European chemicals Agency (ECHA) with supporting documentation (opinions, assessment reports, reasoning etc.) on the basis of which substances have been included in the Core List or national positive lists. This was done to assist ECHA in understanding the 4MSi common approach and so ECHA could estimate any future workload should it have a role in the regulation of substances used in materials in contact with drinking water under the proposed Directive.
Sub-group on cementitious materials SG-CM

The sub-group did not meet in 2019 but did provide ECHA with information in the status of various substances on the admixtures list.

Sub-group on Minor and assembled products (SG-MAPT)

The sub-group developed a proposal for a ‘risk based approach’ to reflect the fact that potential effect on the quality of drinking water is not equal for all products. This approach reduces the requirements for products with a lower estimated potential effect. All products have been divided into five ‘risk groups’, with each risk group having progressively reduced requirements compared to the full set of requirements for the highest effect products, such as pipes. This approach also applies to parts of assembled products, where reduction of requirements is linked to the relative contact area of parts within a product. Under a certain fraction (e.g. 10%), requirements for the part are reduced compared to the requirements for the assembled product.

In addition, a proposal on the certification and approval of products in contact with drinking water is in development. This should lead to the drafting of a common approach. The proposal is already well advanced and describes tasks that need to be carried out to approve and certify a product. These tasks are based on the certification and approval approach used in the CPR. The proposal incorporates a risk based approach (see also above), reducing requirements for products with a lower estimated potential effect on the quality in drinking water. It also takes assembled products into account, again following the risk based approach.

4MSi
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