

Meeting to discuss the impacts of the application of the GRA on enzymes in consumer and professional products in various industries

Minutes

Participants

Brussels, 07 July 2022

- **DG GROW:** [REDACTED] [REDACTED]
- **AMFEP (Association of Manufacturers and Formulators of Enzyme Products):** [REDACTED]
[REDACTED]
- **IFF (International Flavours and Fragrances):** [REDACTED] [REDACTED]
- **Novozymes:** [REDACTED] [REDACTED]

Summary

AMFEP introduced itself as a non-profit European industry association of 28 members, including manufacturers and sellers of enzymes used in the food, feed, detergent and other non-food industries. AMFEP expressed its concerns on the fact that enzymes are under the scope of the extension of the GRA as respiratory sensitisers Cat.1. AMFEP claimed that there are no alternatives to enzymes, whereas several industries are using them to improve their environmental footprint. AMFEP specified that the market value of the EU enzyme sector amounts to EUR 2.16 billion.

Novozymes outlined the environmental benefits of using enzymes in the animal feed and brewery sectors, such as net reductions of CO₂ emissions, acidification, energy consumption and usage of agricultural land. On the other hand, Novozymes claimed that with the extension of the GRA there would not be significant benefits to human health. In this regard, Novozymes specified that there is no documented incident of enzyme allergies among consumers or professionals, whereas incidents among workers are rare and occur only if exposure limits (DMEL) are not applied. Moreover, the environmental benefits, currently provided by enzymes, will be cancelled out and the general population will experience lower efficiency of certain products (e.g. laundry and cleaning products) if the GRA applies.

IFF provided feedback on the CARACAL 45 discussion on the REACH Authorisation and Restriction reform. IFF expressed concerns over the proposed criteria to grant derogations from generic restrictions, particularly on the lack of references to safe use criteria. On the other hand, IFF, AMFEP and Novozymes supported the possibility of having a fast derogation procedure based on the essential use concept. Finally, IFF asked for clarification on how alternatives will be assessed under the essential use framework.

GROW provided clarification on the policy options for the REACH Authorisation and Restriction reform, explaining how the possibility to include authority and industry driven derogations from generic restriction has been considered within the options. GROW pointed out that the criteria and processes to grant such derogations, including the essential use concept, are under discussion.