

The Swedish Forest Industries Federation (SFIF) represents the Swedish forest industries, which refine sustainably sourced wood resources to bio-based products, such as pulp, paper, board, packaging material, sawn timber, refined wood products and advanced biofuels.

SFIF strongly emphasizes **the need of harmonised legislation for products**, due to the fact that products in general are intended to be used in the internal market and to be exported, rather than to be used in a single member state. Harmonized legislation creates a level playing field between Member States, avoids operational unclearness and reduces complexity of how to fulfill compliance. When substances are harmful and banned, it should be equally treated for all Member States and all sectors. SFIF urge that **limitations of chemicals allowed in the internal market should be handled on by EU and not by individual Member States.**

A scenario that would be regrettable is if the Germany notification about a threshold value for MOAH in paper packaging is introduced. At the same time, if France also introduces a threshold value for MOAH, but on inks, it means that a recycled package containing mineral oil and printed with mineral oil-free printing ink, is allowed in France but not in Germany. A package that meets the requirements for mineral oils in Germany but is printed with mineral oil ink will not meet the requirements in France. Furthermore, both France and Germany have proposed very low thresholds and it is unclear which background levels are acceptable in the verification of conformity.

In principle, France's approach to phase out MOAH by starting from the source of mineral oil is better than Germany that intends to regulate end products.

Finally, there is a considerable pieces of product-related EU legislation upcoming and among them is the ongoing revision of the Packaging and Packaging Waste Directive (PPWD). Additionally, the food contact materials (FCM) legislation is expected to be harmonised, covering both printing inks and packages. SFIF has persistently been urging for harmonised legislation for food contact materials emphasize that **Member States can contribute by respecting the ongoing process and share concrete proposals to the EU Commission** rather than introducing national regulations within this field.