ECMA Food Contact Network Update

EUROPEAN CARTON MAKERS ASSOCIATION

ECMA Technical Committee renamed

Since its creation in 2009 the ECMA Technical Committee has been looking after the food safety topics of specific interest for the carton sector. Many things happened and the involved Chairmen and Experts created content and guidance for the membership.
In view of the further structural development of ECMA it was in the last TC meeting the 6/11 proposed and well received to modify the name of the committee into the ECMA Food Safety Committee (FS Com).
Although in the past, also certain environmental topics have been addressed, the new name reflects much better the core content discussed in the committee.

BfR Recommendation XXXVI Paper and board for food contact

At the PTS workshop on the compliance work for paper and board in contact with food (30/10), information was obtained regarding the review of BfR 36.
The new version was published in October and seems to be applicable since the 1st of June.
The BfR Announcement in German can currently be downloaded from :
https://link.springer.com/article/10.1007/s00103-019-03010-z
An aluminium limit of 1000 µg/l in a cold-water extract has been introduced (the limit is however not applicable for dry and non-fatty foods) and the BPA migration limit was in line with the coating Regulation (EU) 2018/213 (12/2018) lowered to 0,05 mg/kg of food.
On mineral oils is - as in the previous version 2017 - mentioned, how "*the migration of volatile and hydrophobic substances via the gas phase has to be considered particularly. This could be compensated by the use of an appropriate additional packaging*".
In the FS Com was stated the aluminium limit is an issue. At ISEGA and Darmstadt it seems 20% or more of the performed tests are not compliant with the limit.
Aluminium is used in the papermaking process (recycled and virgin) as a retention aid. Substances such as aluminium sulphate are needed for the flocculation step. Aluminium is nearly not present in inks.
The substance is typically migrating more into acid food and much less into fatty foodstuffs.
The updated version is not yet available from the BfR website.

Council of Europe

As reported previously (Congress presentation) the Council of Europe, an organisation in which 47 European countries are involved is currently finalising three publications, a General food contact materials resolution, a Technical Guide for paper and board manufacturing and a Technical Guide on the required communication in the supply chain.

The different texts have within the Council of Europe still a confidential status, but the annexed draft general resolution can be shared, as the German authorities in charge of the drafting, circulated the document towards the BLL members.
The document with included general guidance on the substances which can be used for manufacturing food contact materials and the information which needs to be in the Declaration of compliance, was discussed in the FS Com meeting.
FFI stressed in the discussion the importance of the content related to the responsibility of every actor in the chain to assess the (intentionally and non-intentionally) added substances to the product or article. Every stage in the chain needs to take its responsibility. In Germany, certain authorities are still expressing the view it is the actor bringing the final pack to the market who is responsible.

The discussion in the FS Com indicated this general resolution is not containing really wrong requirements. The Council of Europe process is however perceived as not democratic and the value of having the OML limit of 60 mg/kg of food is also questionable.
In a recent Belgian Food Safety Authorities meeting, it was confirmed a one month public consultation process is foreseen in the coming months and the different documents will be published in 2020.

Titanium Dioxide

TiO_2 is a widely used white substance, present in many applications such as, paints and varnishes, cosmetics, toothpaste, in food as the food additive E171, in plastic and paper, giving the material or article a bright white appearance. The presence of a nano-fraction seems to be inevitable in the TiO_2 manufacturing process.
According to TDMA, the Titanium Dioxide Manufacturers Association, the main uses of TiO_2 in the paper sector are in decorative paper, wall papers and packaging.
TiO_2 can be present in carton board, for further improving the brightness of the white surface.

Initially the safety concern was mainly related to its inhalation at the workplace. The International Agency for Research on Cancer (IARC) has classified TiO_2 dust as a Group 2B carcinogen, which means "possibly carcinogenic to humans."
A number of discussions are still ongoing, regarding the status of the substance in relation to the "CLP" Regulation (EC) No 1272/2008 on classification, labelling and packaging of substances and mixtures. The Risk Assessment Committee of ECHA (European Chemicals Agency) issued in September 2017 on opinion, classifying $Ti0_2$ in category 2, as a suspected carcinogen when inhalated.
Based on this opinion the Commission introduced different proposals into the REACH "comitology" committee with the Member States. Industry and certain Member States expressed a strong opposition to the category 2 classification requiring labelling as a potentially carcinogen and the Commission has in recent weeks been trying to clarify the classification by a delegated act.

For EFSA (European Food Safety Authority) the currently available data related to the oral intake of Titanium Dioxide are not indicating a health concern for humans (2016 and confirmed in June 2018).
Related to the study by INRA (French National Institute for Agricultural Research) linking the food additive to the development of precancerous lesions in rats, the French Food safety authorities (ANSES) stated in April there is a need for more toxicological data to remove the uncertainty and to allow the determination of an acceptable daily intake.
Due to political pressure the French government decided (17/04) to ban food containing E171 on the French market for one year from January 2020 on.
In food contact materials, TiO_2 is authorised for use in the Plastic Regulation (EU) No 10/2011, with no SML specified, which means the generic migration limit of 60 mg/kg of food applies (Food contact material substance number 610)

PFAS & Glymo

As indicated (FC Mail 9/07) the Danish authorities will ban the fluorinated substances from July 2020 on. The adopted text is now going through the notification process. TRIS notification number 2019/520/DK (23/10).
https://ec.europa.eu/growth/tools-databases/tris/en/search/?trisaction=search.detail&year=2019&num=520
Other Member States can react until the 24/01. The risks related to PFAS are also debated in the Netherlands and Germany, and there are indications Germany may follow the Danish legislation.

According to communication obtained from FEICA, Glymo (Update mail 5/09) is to their current knowledge not present in adhesives for carton manufacturing. The substance was used for high performance packaging (for example packaging for sterilisation etc) and is being phased out.

Recyclability Guidelines for paper-based packaging

Many times, the drafts of this publication have been covered. The comments regarding this final version were included in the previous update (7/10). The publication can now be downloaded:
http://www.cepi.org/recyclability_guidelines

Interesting for the further debate on the recyclability of cartons are a number of statements made at the PTS Workshop "Recyclability of paper and board-based packaging. (Dresden 29th October)

Some main messages presented in the FS Com (6/11):

- The 5% limit, in certain platforms used to define if a pack is a composite packaging or not, has no relation with its recyclability. (Lydia Tempel - Head of Department Raw materials and recycling PTS)
Packs with less as 5% can be very badly recyclable in standard mills, packaging with 20% can have good recyclability characteristics.
- The smaller the size of the contaminations, the more difficult to eliminate. Barrier solutions with substances remaining in the recycling loop are not necessarily be the best option. It may be valuable to have an optimized polymeric layer in the reject and to use the plastic waste. (Lutz Hamann - Project Manager Raw materials and recycling PTS)
- Pictures from test results for one side layered cartons are well indicating how the reject only contains the clean thin plastic layer.
In material combinations, the main problem can be with the glues used, remaining in the flow and less with the thin plastic film reject.
- The reject from the paper mills is definitely about much more as just the questioned coarse reject.
- Deinking is not part of the packaging recycling process. The dirt spots, the recycling of UV printed paper and board is generating, is nevertheless considered as an issue to monitor. It seems certain UV inks have been developed to be screened out in the stock preparation at the papermill.

28th November 2019