



European Consumer Organisation - Call for action on paper and board food contact materials

Mid-summer the European Consumer Organisation BEUC came with new test results supporting the view there is a need for an EU-wide regulation on paper and board as a food contact material.

<https://www.beuc.eu/publications/eu-needs-rules-chemicals-coffee-cups-straws-and-other-paper-food-packaging-consumer/html>

https://www.beuc.eu/publications/beuc-x-2019-042_more_than_a_paper_tiger_test_summary_food_contact_materials.pdf

Four national consumer organisations from Italy, Norway, Denmark and Spain have been investigating the presence of primary aromatic amines (PAAs), photoinitiators and related substances in printed paper and board FCMs.

The survey sampled 76 different paper and board food contact materials such as coffee and soda cups (board), paper plates and straws, napkins, muffin forms, paper bags from bakeries and from pick and choose candy shops as well as paper and board packaging from grocery items like pastas, grains and noodles.

PAAs used in the manufacturing of certain ink pigments were detected in 13 samples, with 9 samples above the limits set in the Plastics Regulation (sum not assessed PAAs below 10 µg/kg food) or the BfR Recommendation (PAAs classified as carcinogenic Cat 1A or 1B below 2 µg/kg food).

The test results varied from 5 µg to 65 µg, 6,5 times the limit for plastics.

These samples were mainly single use products such as drinking straws and children's products such as candy bars.

PAAs with a harmonised CMR (carcinogenic, mutagenic, reprotoxic) classification, such as aniline (Category 2: suspected to have CMR potential for humans) were found in 3 products.

On photoinitiators (PIs) the survey tested for the well-known Benzophenone and ITX, as well as for 14 other less investigated PIs and related substances.

The migration analysis found PIs or a related substance in the food or a food simulant in 8 samples of which 6 samples were exceeding the limits included in the Swiss Ordinance.

3 single use products as well as 3 grocery products are concerned, including a small raisin box, where 4 different PIs were found migrating above the Swiss limits.

The analysis for the 6 samples showed also a high migration for DEHF, bis(2-ethylhexyl) fumarate used in printing inks as a binder or a monomer, not as a PI. The substance was detected at levels more than 400 times the recommended 10 ppb limit.

The BEUC call for action, contains further references to studies by consumer organisations on the presence of fluorinated substances (PFAS) in fast food packaging made from paper and board (2017), the mineral oil contaminations found in food (2018) and the presence of BPA, phthalates and nonylphenol in cardboard boxes (Denmark 2015).

The objective of the BEUC communication is clear.

Against the background of the Single Use Plastics Directive and the broader general public debate, companies are looking for alternatives to plastics, but those alternatives need to be regulated and safe.

“We insist in particular on the need for comprehensive, harmonised regulation of all FCMs, including paper and board as well as printing inks, based on a precautionary approach, combined with a shift in the effective burden of proof from public regulators to industry, better enforcement and improved transparency for consumers.”

All in all, a number of policy statements made are not that far away from views expressed by ECMA.



What is wrong is the created perception paper and board packaging (cardboard specifically mentioned a few times) is unsafe based on probably a very limited number of “non-compliant” samples from an unclear origin. Also wrong is the statement plastic packaging is regulated while paper and board isn't.

Yes, the Plastics Regulation regulates the plastic substrate and the migration of substances from plastic packaging which are on the Union List, but not the many other substances which can be used in inks.

The inks and adhesives are in general not regulated in a harmonised way and this is the case for all packaging materials.

Furthermore BfR 36 is a major European reference for the paper and board substrate.

In recent years it became also clear cartons are definitely not the only and main source for the mineral oil contaminations in food.

A second document available from the BEUC website on the reform of the EU Food Packaging legislation is more balanced and is also addressing non-compliance issues for other FCM materials.

https://www.beuc.eu/publications/beuc-x-2019-029_beuc_comments_to_food_contact_materials_refit_evaluation.pdf

The Packaging Ink Joint Industry Taskforce (PIJITF) asked to obtain the full detail of the test results and asked for a meeting with the BEUC. In case it would come to a discussion, ECMA will of course take part.

Glymo

3-(2,3-epoxypropoxy)propyl]trimethoxy silane

In presentations and meetings DG SANTE expressed disappointment regarding the ongoing use of glymo in food contact materials.

“Although the industry is aware of the genotoxic potential since 2 decades, little was done to phase out the substance.” For substances with a genotoxic potential the 10 ppb migration limit can't be used.

Genotoxicity needs to be ruled out.

Glymo could be present in certain adhesives and we are aware FEICA issued a recommendation to its members to phase out the substance before the end of 2020.

Useful to check with your adhesive suppliers.

Food safety Conferences

9 September (Brussels)

Second Workshop to support the Evaluation of Food Contact Materials legislation.

Upon invitation. ECMA involved as a stakeholder.

24-25 September (Brussels)

Keller and Heckman “Food Packaging Law Seminar”

http://www.khlaw.com/Files/40285_2019%20Agenda%20-%20Food%20Packaging%20Law%20Seminar.pdf

24-26 September (Baveno)

Instituto Italiano Imballaggio - International Conference Food Contact Compliance.

https://www.packagingmeeting.it/wp-content/uploads/2017/01/2019_International_conference_EN.pdf

24th October (Zurich)

Workshop Food Packaging Forum “Improving the chemical safety of food contact articles: accelerating science and innovation.”

<https://www.foodpackagingforum.org/events/workshop2019>

29th October (Heidenau/Dresden)

PTS Workshop “Recyclability of paper & board based packaging.”

https://www.ptspaper.com/fileadmin/PTS/PTSPAPER/05_Weiterbildung/Dokumente/Programm_191029_WS_Rec_EN_Highlights.pdf



30th October (Heidenau/Dresden)

PTS Workshop "Introduction to compliance work and quality assurance for paper and board in contact with food (FCM).

https://www.ptspaper.com/fileadmin/PTS/PTSPAPER/05_Weiterbildung/Dokumente/Programm_191030_WS_KF_EN_V02_ScM_Har.pdf

11-13 November (Florence)

Seminar Main laws on FCM in the world.

<https://www.packagingmeeting.it/en/shop/conferences/seminar-main-laws-on-fcm-in-the-world-4/>

2-5 December (Amsterdam)

Smithers Pira P&P 2019 -Plastics & Paper in contact with foodstuffs.

<https://www.food-contact.com/plastics-paper/2019-programme>

11 December (Paris)

Annual Seminar Club MCAS (Matériaux pour Contact Alimentaire Santé)

Date confirmed, program not yet announced.

www.club-mcas.fr

5th September 2019

