

Information needs throughout the food contact materials supply chain.

One of the key challenges in assessing the food safety compliance of materials and articles is obtaining accurate food safety information from the own suppliers. Which substances may migrate? Which risk assessments were performed upstream? What does it mean a confirmed compliance with certain well known reference legislations?

Starting from the obtained information, converters are able to do the own further compliance work in a cost-effective way. Often based on worst case calculations migration limits can be checked for substances which may originate from the different materials used in carton manufacturing.

Hundred percent safety will never be reached but the sharing of adequate information is clearly part of the further improvement process, and many initiatives are taken to clarify the required information flow.

Aside the existing and coming guidance from the authorities, also certain industry platforms are seriously looking into the real information needs.

A detailed study, the so-called information flow matrix exercise is currently underway within the Packaging Ink Joint Industry Taskforce (PIJITF) in which ECMA is well involved. A detailed questionnaire went out to all levels of actors in the food contact materials supply chain: the substance and food contact additives manufacturers, the ink sector, the packaging manufacturers (different materials), the food industry / packer fillers and the retail sector.

The questionnaire reflects well the further developed knowledge and understanding regarding the used substances. Aside the clearest category of the used listed substances (in board, inks, plastic ...), there are the NIAS substances (impurities, degradation and reaction products) and also the upstream used self-assessed not listed substances and this last category may for certain materials upstream even be the dominant number of used substances.

The ECMA Food Safety Committee is closely involved in providing input for the carton manufacturing sector. More information is available on demand.

Mutual recognition

From the 19th April, Regulation (EU) 2019/515 on the mutual recognition of goods is applicable.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32019R0515>

The new text repeals the existing regulation (EC) No 764/2008. In absence of a wanted well harmonised FCM legislation, mutual recognition is essential for the free movement of goods in the internal market.

Member States may not prohibit the sale on their territory of imported products which are lawfully marketed in another Member State.

This principle is however not an absolute right. As well presented by Keller & Heckman at a Club MCAS event late January, there are still exceptions. Member States can, based on Article 36 of the Treaty on the Functioning of the European Union (TFEU) still restrict the import, export or goods in transit, for instance to protect the health and life of humans.

A number of provisions are new in the now applicable regulation. Operators can issue a mutual recognition declaration, with included the arguments or comments to support the market access of their products in the Member State of destination. Problem solving procedures are installed.

A template for such a mutual recognition declaration is available in the Annex of the Regulation and this document may be attached to the Declaration of Compliance.

In the ECMA Food Safety Committee the comment was made the new text is still not ideal.

In a certain reading of the text the perception may exist, Member States had previously to accept, while now they can accept the mutual recognition.

ECMA is certainly interested to learn about problems carton makers may still encounter in this respect.



Pro Carton Carbon Footprint Study

Most of you are in between very well aware of the Pro Carton environmental publications released last November.

As ECMA technical experts have been contributing with environmental data for the converting side, the Carbon Footprint publication was briefly commented in the ECMA Food Safety Committee meeting (5/03).

Compared to the previous edition, the excellent new publication is covering many more areas in a full cradle to end of life approach, well taking in account the biogenic and fossil CO₂ emissions and uptake. The methodology used by the involved consultant RISE is based on the CEPI/CITPA 10 Toes methodology and existing ISO standards.

Both, “The carbon footprint of carton packaging 2019 full report” and “The carbon Footprint of carton packaging 2019 Executive summary” are available from the Pro Carton website. <https://www.procarton.com/publications-news/publications/>

The core data:



Carbon footprint of cartons, kgCO ₂ e per tonne of cartons				
Fossil GHG emissions	Biogenic GHG emissions	GHG removals	Direct land-use	Total
1,025kgCO ₂ e	1,001kgCO ₂ e	-1,708kgCO ₂ e	9kgCO ₂ e	326kgCO₂e

Although the temptation is great - especially in a Green Deal context - the FS Com experts are of the opinion one should avoid comparing with other materials. Sector guidelines to calculate carbon footprints are different, to take in account the specificity of the material and its processes.

The ECMA webinar “Sustainability Unboxed” on the 6th of May forms an excellent occasion to learn even more about this CF publication, directly from the RISE consultants.

Normally all of you obtained the invitation directly. If not, please contact the ECMA secretariat.

Circulation Food Contact update mails.

Currently ECMA is sending the “detailed” FC update mails to 68 experts from the carton makers community and we are certainly looking forward to add even more contacts who would appreciate to receive this type of information directly.

New is how those updates are now also well available for all members at any time from the ECMA Members only section.

www.ecma.org → Login → Members Only → ECMA Food Contact Network updates

Additionally, a more general summarising quarterly report was introduced, circulated to all members via a link in the monthly ECMA Newsletters.

This document is also available from the same location on the ECMA website.

Further short FC news

- Review process EU FCM legislation, 2 years delayed.

The Ecorys evaluation report was finalised end 2019 (See FC update 7/10/19) and the Commission has now in mind to start an impact assessment study which will take until Q4 2021. Early 2022 it is the Commission’s intention to release the results of the impact assessment, the evaluation report and a staff working document.

- All shared comments (See FC update 13/03/20) regarding the Council of Europe Technical Guide on paper and board, were well introduced in the 2 days web meeting the 8-9/04. We expect a number of comments will be in the final version which will go to the next plenary meeting of the Council of Europe. Once that version available, we will report on the obtained modifications.



- A low limit for aluminium has been introduced in the BfR 36 recommendation. (See FC update 28/11/19) In between a transition value has been adopted of maximum 2 mg/l in a cold-water extract. From January 2021 on, the limit of 1 mg/l will be applicable. <https://rdcu.be/b3JKB>

- PFAS

A web search leading to different US sites provided more indications on which PFAS alternatives are suggested by sources close to US Washington State government and certain NGO's.

In those publications the mentioned current alternatives are based on natural starch, PLA, branded coatings of an unknown hazard profile, a mechanical compressing treatment, clay and bio waxes.

<https://48h57c2l31ua3c3fmq1ne58b-wpengine.netdna-ssl.com/wp-content/uploads/2018/01/Alternatives-Food-Packaging-PFAS-Fact-Sheet-CPA-1-23-18-v2-FINAL-with-logos-1.pdf>

In the March FS Com meeting was stated how the communicated solutions are 20 years old and had and will not have the same efficiency.

- A DOC template has been adopted between the French food and packaging industries.

<https://www.ania.net/alimentation-sante/declaration-conformite-materiaux-equipements-au-contact-denrees-alimentaires>

- The French Circular Economy Bill contains aside tough restrictions related to the SUP Directive, also a ban on mineral oils in packaging from the 1/01/22 on. A similar ban will be applicable for mineral oils in all types of printing from the 1/01/25.

<https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000041553759&categorieLien=id>

(See Article 112)

https://www.legifrance.gouv.fr/eli/loi/2020/2/10/TREP1902395L/jo/article_112

The authorities are in this respect also looking into the MO presence in adhesives.

- The persistence of the Corona virus on substrates (See FC quarterly update Q1 2020 7/04/20) is also mentioned in a recent interesting Mc Kinsey publication "How the packaging industry can navigate the coronavirus pandemic".

<https://www.mckinsey.com/industries/paper-forest-products-and-packaging/our-insights/how-the-packaging-industry-can-navigate-the-coronavirus-pandemic>

The following excerpt is taken out of the section "How will COVID-19 affect the industry's megatrend drivers?"

*"A resourceful packaging company might be able to help both customers and consumers if it found a cost-effective and sustainable substrate on which the novel coronavirus has minimal viability. There is plenty of room for improvement: a recent study showed that the virus's survival rates varied from 24 to 72 hours on different packaging substrates, with the longest being on plastic and stainless steel."*⁹

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