

## Fluorinated substances

In the FC update mail (28/11/19) we shared the link to the notification of a national Danish measure regarding the fluorinated substances.

Denmark notified, their intended legislation to ban the placement on the market of food contact materials made of cardboard and paper if perfluoroalkyl and polyfluoroalkyl substances (PFAS) have been used. This notification process is now closed and comments came from different mainly paper manufacturers associations: CEPI, Aspapel (Spain), Federchimica (Italy), the Swedish Forest Industries association and Iggesund.

Opposing opinions were expressed.

<https://ec.europa.eu/growth/tools-databases/tris/en/search/?trisaction=search.detail&year=2019&num=520>  
(See section contributions)

Entirely correct are the statements, food safety legislation should be introduced at a harmonised European level and how as for other contaminants the exposure to PFAS is definitely not only related to packaging. The EFSA scientific opinion from December 2018 mentions how those substances are - as persistent contaminants - present in the environment, leading to exposure also via drinking water and food categories such as fish and other seafood, meat and meat products, eggs and egg products, milk and dairy products.

ECMA updated its factsheet on the Fluorinated substances, available from the website:

[www.ecma.org](http://www.ecma.org) / Member Login / Members Only / ECMA Sales Toolkit / ECMA Fact Sheets / Fluorinated substances.

As in the previous version ECMA recommends its members producing for Danish customers or for customers exporting to Denmark, to verify with their suppliers the availability of fluorine free alternatives. Even if carton makers are not in relation with customers working for the Danish market, it is - in view of compliance with Article 3 of the Food Contact Materials Framework Regulation (EC) 1935/2004 - good practice to avoid fluorinated compounds on used substrates, which are not present on any positive lists (Plastics Regulation, BfR 36 ...) and in general to investigate the available alternatives.

COOP Denmark mentioned already in 2015 how they introduced fluorine free solutions, also for the microwave oven popcorn paper bags.

Asking the Danish Technical Institute (DTI) after the alternatives, they shared an article published in January 2020 on a new type of natural starch treatment ...

<https://packm.dk/artikel/foedevareemballage/nyt-papir-lser-problemet-med-fluorerede-stoffer>

## European Consumer Organisation BEUC (Photoinitiators and PAA)

Mid last year (see FC update 5/09), the BEUC came with migration test results for paper and board food contact materials.

In follow up to the discussion in the Food Safety Committee in November, we tried to obtain further background from the involved national consumer organisations.

The Norwegian Consumer Organisation confirmed the highly contaminated raisin carton box, well visible on their website is an imported pack from the brand Sun.Maid. (Californian sundried raisins)

<https://www.forbrukerradet.no/siste-nytt/uonskede-stoffer-i-papp-og-papiremballasjen-pa-flere-matvarer/>



The four photoinitiators that were found above the limits were: 1-Hydroxycyclohexyl phenyl ketone (947-19-3), 2,2-Dimethoxy-2-phenylacetophenone (24650-42-8), Methyl-2-benzoylbenzoate (606-28-0) and 2-Isopropylthioxanthone (5495-84-1).

For the Leksands pack also identified as contaminated, the material was paper. For the photoinitiators the tested sample overwent the limit for 1-Hydroxycyclohexyl phenyl ketone (947-19-3) and Methyl-2-benzoylbenzoate (606-28-0), and for PAA the 4-aminotoluene-3-sulfonic acid (88-44-8) limit.

### Mineral oils

The contamination of food by mineral oils is a still ongoing sensitive debate, with late October last year again test results from FoodWatch for baby food in metal packaging taken from the French, German and Dutch markets. This time the metal treatment when making the metal boxes was mentioned as a source. <https://www.foodwatch.org/en/news/2019/foodwatch-laboratory-tests-suspected-carcinogenic-mineral-oil-residues-in-baby-milk/>

For those of you interested in a comprehensive overview of the current understanding on the mineral oil contamination of food, FFI shared the latest Version 3 of their Fact Sheet. (See annexed) On demand we can also send you the separate “Questions and answers” document. Both are also available in German.

### DGCCFR File on paper and board (France)

Aside the previously reported content included in this French guidance on paper and board for food contact (see FC update 9/07), it was additionally highlighted in the FS Committee, how it is also in view of this guidance especially important to clarify in your contacts with food customers, the real surface/volume ratio of the packed food.

<https://www.economie.gouv.fr/dgccrf/Papiers-et-cartons>

Migration limits are expressed in mg/kg food, and to verify compliance the surface/volume ratio between the food and the packaging is critical.

Often the so-called EU cube of 6dm<sup>2</sup>/kg is used. The guidance by the French authorities indicates the real conditions for cartons are generally between 10 dm<sup>2</sup>/kg and 50 dm<sup>2</sup>/kg (which can happen for certain cereal packs) and in case nothing is known, one needs to calculate in the risk assessment with the worst case situation of 50 dm<sup>2</sup>/kg.

### FOOD SAFETY CONGRESSES 2020

4-6 February (Heidenau)

PTS Workshops “Recyclability of paper & board based packaging” and “Introduction to compliance work and quality assurance for paper and board in contact with food (FCM)” (English)

[https://www.ptspaper.com/?status=register&event\\_id=10431&id=3059](https://www.ptspaper.com/?status=register&event_id=10431&id=3059)

[https://www.ptspaper.com/?status=details&event\\_id=10429&id=3059](https://www.ptspaper.com/?status=details&event_id=10429&id=3059)

11-12 February (Brussels)

Chemical Watch “Food Contact Regulations Europe 2020”

<https://events.chemicalwatch.com/77006/food-contact-regulations-europe-2020/programme>

25-28 February (Seattle US)

GFSI Conference

<https://mygfsi.com/events/gfsi-conference/>



4-5 March (Dresden)

PTS Fachtagung "Papier und Karton im Lebensmittelkontakt - aktuelle Entwicklungen." (German)

[https://www.ptspaper.de/veranstaltungen/?status=details&event\\_id=10405&cHash=e7aba99825292dc03d412a2607980f1b](https://www.ptspaper.de/veranstaltungen/?status=details&event_id=10405&cHash=e7aba99825292dc03d412a2607980f1b)

25-26<sup>th</sup> March (Düsseldorf)

EU Food Packaging Law Seminar - Keller and Heckman

<https://www.khlaw.com/Dusseldorf-Food-Packaging-Law-Seminar-2020>

1-2 April (Düsseldorf)

3<sup>rd</sup> Annual Food Safety & Quality Summit

<https://vonlanthengroup.com/en/events/3rd-food-safety-and-quality-summit.html>

23-24 April (Bethesda Maryland US)

Smithers Global Food Contact 2020

<https://www.food-contact.com/global-food-contact>

28<sup>th</sup> April (Aschaffenburg)

Lecture event of the VFV "Trends 2020 in the field of European Food Packaging"

<https://vfv-aschaffenburg.de/Tagung2020-e.htm>

4-5 June (Köln)

9<sup>th</sup> International Akademie Fresenius Conference "Residues of food contact materials in food"

<https://www.akademie-fresenius.com/events/detail/produkt/9th-international-akademie-fresenius-conference-residues-of-food-contact-materials-in-food-2/>

22<sup>nd</sup> October (Zurich)

Food Packaging Forum's Workshop 2020

<https://www.foodpackagingforum.org>

18-20 November (Barcelona)

ILSI 7<sup>th</sup> International Symposium on food packaging - Scientific developments supporting safety and innovation.

<https://ilsi.eu/event/7th-international-symposium-on-food-packaging-scientific-developments-supporting-safety-and-innovation/>

December (Dates and location to be confirmed)

Smithers conference "Plastic and Paper in contact with foodstuffs"

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

31<sup>th</sup> January 2020

