

Council of Europe

At its recent meetings the ECMA Food Safety Committee has been assessing the different Council of Europe draft documents (circulated the 6/02) :

- Guiding Principles for Food Contact Materials and Articles, the so-called “General FCM resolution”. [GP]
- Technical Guide on Paper and Board Materials and Articles for Food Contact. [TG]

Regarding the Technical Guide on Paper and Board, the following critical issues were especially highlighted in the FS Com meeting the 5/03: the allowed use of recycled fibres, the included contaminants table and the barrier efficiency testing.

- Within paragraph [TG 2.2] it is well stated how “*Recycled cellulose fibres may be used provided that the paper and board is manufactured in accordance with good manufacturing practices ...*”, and how “*When using recycled cellulose fibres, precautionary considerations and measures are needed to fulfil the general requirements. The use of input materials of suitable quality and the application of a cleaning process are necessary. Relevant quality criteria have to be always specified and checked. Additional measures such as the use of functional barriers (on the paper or board or as an internal bag) or functional adsorbents (added to the recycled material to retain substances in the paper or board) might be needed.*”
- The specific migration limits (SML) for some constituents or unknown contaminants included in [TG Annex II Table 1] are rather aligned with the limits present in the CEPI/CITPA Food Contact Guidelines. Due to the used 10% allocation factor (the share of the limit which is allowed to come from the food contact material), the French DGCCRF recommendation is much stricter. A comparison:

SML mg/kg in food/food simulant	Council of Europe	CEPI CITPA ~ BfR	DGCCRF
	Phthaltes and other plastizers		
DBP + DiBP	0,3	0,3	0,012
DBP		0,3	
DiBP		0,3	
DEHP	1,5	1,5	0,3
BBP	30		3
DINP + DIDP			0,9
Photoinitiators			
Michler's ketone	0,01	0,01	
BP + 2MBP + 3MBP + 4MBP	0,6		
BP + 4MBP + 4 HBP			0,6
BP		0,6	
BP + 4MBP		0,6	
2MBP, 3MBP, 4MBP and Sum	0,05		
1-Hydroxycyclohexyl(phenyl)ketone			0,01
2-ethylanthraquinone			0,01
2-ethylhexyl 4-(dimethylamino)benzoate			2,4
ethyl-4-(dimethylamino)-benzoate			0,05
ITX			0,05



PAA's			
Sum all		0,01	0,01
Individual PAA's			0,002
CMR 1A or 1B			0,002
Hydrocarbons			
Benzo(a)pyrene +		0,001	0,001
Benzo(a)anthracene +			
Benzo(b)fluoranthene +			
Chrysene			
PAH			0,01
MO		Under discussion	Under discussion
PFAS			
		Under discussion	
PFOA			0,05 µg/kg

- The main comment ECMA will introduce once again in the current consultation is related to the barrier efficiency testing.

Within [TG 3.3] the Swiss requirements are given as an example. The described method suggests it is necessary to reach a 99% barrier efficiency in order to keep the migration of all possible unknown substances below the level of 10 ppb per kg of food.

In a number of conditions there are good arguments to counter this required efficiency level. In cases where for instance optimized recycled board is used or when CMR substances could be excluded or when protection is provided with different packaging layers, also less effective barriers may be good enough.

Out of the discussions in the FS Com, you will find annexed the text changes ECMA is proposing in the public consultation, open until next Monday.

<https://www.edqm.eu/en/news/food-contact-materials-and-articles-new-documents-consultation>

A final (web)meeting of the Council of Europe Ad Hoc WG for paper and board is scheduled for the 8-9 April. The adoption and publication can be expected later this year.

A clearly positive legislative signal embedded in the CoE draft documents is the shared responsibility throughout the supply chain. [GP 8.1 and 8.2]

"Documentation of compliance (supporting documents) ...

At every step of manufacturing food contact materials and articles, compliance shall be demonstrated a) for each substance introduced, including its impurities and the reaction and degradation products which may be formed, and b) for the materials and articles resulting from this manufacturing step."

"Declaration of compliance ...

A declaration of compliance is issued at all stages of manufacture and processing of food contact materials and articles."

This clear reference to a shared responsibility is in opposition to certain national legislations, putting the responsibility much more with the packaging manufacturer.

Corona Virus

We are all overloaded in the public domain with information on the new Corona virus.

EFSA has also expressed opinions regarding the outbreak. According to EFSA there is no evidence that food is a likely source or route of transmission.

<https://www.efsa.europa.eu/en/news/coronavirus-no-evidence-food-source-or-transmission-route>

Similar information is available from the BfR.

<https://www.bfr.bund.de/cm/349/can-the-new-type-of-coronavirus-be-transmitted-via-food-and-toys.pdf>

