

ECMA GMP

In recent months a GMP Working Group has been discussing the further positioning of the ECMA Good Manufacturing Practices publication and the approach presented at the latest ECMA congress was confirmed once again.

In the current market context with the public certification schemes like BRC or FSSC well in place, a reviewed ECMA GMP document should provide hands-on advice on how to achieve compliance within the schemes, with a focus on the specifics of carton manufacturing which is not covered in the mentioned scheme publications.



The GMP Working Group was reviewing the BRC Issue 6 Packaging Materials publication and identified 9 paragraphs requiring major sector specific guidance:

- Hazard analysis and risk assessment.
- Specifications.
- Supplier approval and performance monitoring.
- Product authenticity, claims and chain of custody.
- Management of subcontracted activities and outsourced processes.
- Equipment.
- Graphic design and artwork control.
- Product inspection, testing and measuring
- Incoming goods.

As the information available to ECMA is indicating 95% of the members used BRC as the starting certification before implementing the existing ECMA GMP, priority is given to guidance in relation to this scheme. Similar guidance may in future be developed for the other schemes such as FSSC 22000.

Information sharing in the food contact materials supply chain.

One of the key challenges in assessing the food safety compliance of materials is obtaining accurate food safety information from the own suppliers. Which substances may migrate? Which risk assessments were performed upstream? What does it mean, if a supplier declares the delivered raw material is compliant with certain well-known reference legislations?

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

A study is currently underway within the Packaging Ink Joint Industry Taskforce (PIJITF).

A detailed questionnaire went out to all levels of actors in the food contact materials supply chain: the substance manufacturers, the ink sector, the packaging manufacturers (different materials), the food industry and the retail sector.

The ECMA Food Safety Committee is closely following the PIJITF work and is providing input for the carton sector.

The outcome of this PIJITF study will bring accurate self-guidance in the FCM supply chains and provide content from the industrial side in the food safety discussion platforms with the authorities.

The ECMA Food Safety Committee decided also to develop based on the discussions in the PIJITF, different well adapted practical questionnaires, carton makers will be able to use with their board, ink and adhesive suppliers.

More information is available in the detailed Food Contact Update mail 23/04.

Those detailed updates are sent to the members having expressed an interest and are always accessible via the Members Only Section of the ECMA website.



Technical Guide for Paper and Board (Council of Europe)

The obtained latest version is indicating certain introduced comments have been taken in account. ECMA tried to avoid that only 99% efficient barriers are presented as providing enough safety.

Within the section 2.1 “General requirements” is now stated how *“The effectiveness of barriers placed onto the paperboard and adsorbents needs to take in account the overall packaging concept and the actual conditions. Protection against migration may be provided by a combination of packaging layers.”*

For the mineral oils the table with migration limits for known constituents and contaminants stipulates the MOH are under discussion, with now the following comment below: *“Until a specific migration limit or other restrictions based on the evaluation of the latest available scientific evidence can be established, producers or other operators responsible for placing on the market of food contact materials and articles are recommended to keep migration of MOH as low as reasonably feasible (instead of technically unavoidable) and to ensure that migration of genotoxic, carcinogenic MOAH’s (instead of all MOAH) does not occur.”*

According to the latest messages, the publication of the general “Guiding principles for food contact materials and articles” and the “Technical Guide for Paper and Board” are now scheduled for early 2021.

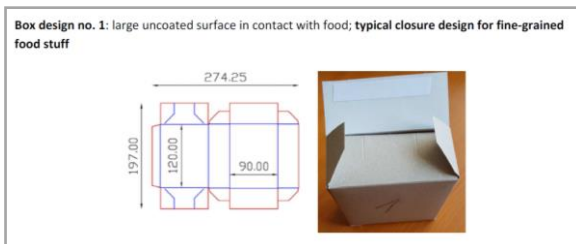
More information is available in the detailed Food Contact Updates: 06/05 and 07/07

SVI/JIG project “Barriers or sorbents for safe food packaging with recycled paperboard”

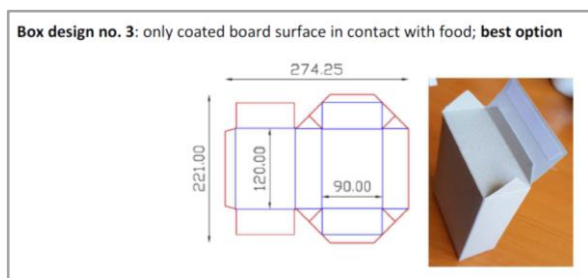
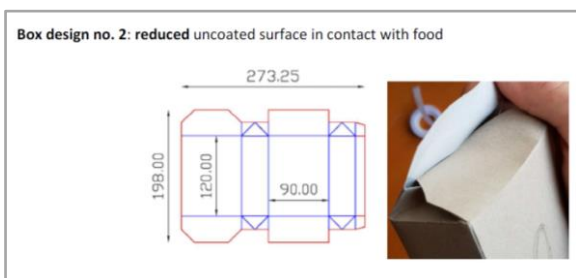
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At its web-meeting the 30th June, the ECMA Food Safety Committee has been carefully reviewing the outcome of the newest project by the Swiss Packaging Institute on flap closures for cartons.

The objective of the study was to check the migration through the closures for cartons made from recycled board with a proven effective barrier applied on the reverse side of the board. 3 closure systems were tested, 2 well existing and one advanced with only coated board in contact with the food.



As ECMA has been participating in the project, we had on a confidential basis direct access to the preliminary report.



The data are indicating for one of the surrogate substances used in the testing, after half a year, 14% of the present contamination was migrating into the food for the Box designs 1 & 2, while a migration of 9,5% was reached for the Box design 3.

In the report it is well explained why the outcome of the testing for Box design 3 is not considered as conclusive. The used tear strip for forming the box is not representative for the more effective sealing on a well-equipped industrial gluing line and this is probably leading to a too high detected migration.

The study proves nevertheless the importance of the closure system (and the gluing), when using barrier boards.

More information is available in the detailed Food Contact Update: 07/07

