



In the fourth quarter 2020, there were several important developments at Commission level. On the 14<sup>th</sup> October the Commission presented its “Chemicals Strategy for sustainability. Towards a toxic free environment” and 18<sup>th</sup> December DG SANTE published the Roadmap for the revision of the EU rules on food contact materials.

The Chemicals Strategy will lead to an even stricter monitoring of certain categories of substances such as the substances of very high concern (SVHC), the carcinogenic, mutagenic and reprotoxic substances (CMR) and the endocrine disrupting chemicals (EDC). The PFAS substances will be phased out unless their use is considered as essential.

As the FCM legislation is presented as being directly relevant for the success of the key Commission policies under the EU Green Deal, it became clear food safety is now higher up on the European political agenda. The core general FCM legislation under review, the so-called “Food Contact Framework Regulation” was published in 2004. The published Roadmap for the review provides interesting insights in a number of measures under consideration.

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12497-Revision-of-EU-rules-on-food-contact-materials>

One of the considered measures is an increased focus on the compliance of the final article and for the carton sector and in general the converting sectors, it will be critical to avoid an increased responsibility. The full chemical knowledge about substances is with the suppliers. They know which reactions may take place and which impurities can be expected.

ECMA is closely following the legislative FCM discussion and information on the developed ECMA positions is shared via the Food Contact Network and the members section of the website. The national member associations and the member companies can also submit comments regarding the published Roadmap via the link above. The current feedback possibility is open until the 29/01.

## **Council of Europe**

This larger European platform adopted on the 7<sup>th</sup> October the Resolution CM/Res (2020)9 on the safety and quality of materials and articles for contact with food.

<https://www.edqm.eu/en/news/new-council-europe-resolution-strengthen-safety-food-contact-materials>

The adopted resolution indicates which substances can be used in food contact materials and which information needs to be shared via the declarations of compliance.

A DOC needs to be issued at all stages of the supply chain and means that the manufacturer of the food contact material or article assumes responsibility for the suitability for food contact, including the safety of all released substances, unless he has informed the next business operator in the supply chain further specified compliance work needs to be performed.

Very valuable in the described information needs are the provided further details on what has to be included for the Non-Intentionally Added Substances (NIAS): The FCM manufacturer (upstream, our suppliers) has to make available information on the substances used and, on the impurities, reaction and degradation products, for which the manufacturer has identified that further compliance work needs to be conducted. This includes the requirement to provide information on NIAS known or foreseen to be generated at later production stages!

ECMA is directly using those information requirements in its position towards the Commission.



## PFAS Alternatives

The OECD published a report “PFAS and alternatives in food packaging (paper and paperboard): report on the commercial availability and current uses.”

<https://www.oecd.org/chemicalsafety/portal-perfluorinated-chemicals/PFASs-and-alternatives-in-food-packaging-paper-and-paperboard.pdf>

This report gives an overview of the available physical and chemical alternatives, their efficacy, uptake and market penetration.

Some of the mentioned physical and chemical alternatives or combinations are performing very well. The cost increase seems to be the main obstacle. Switching to a chemical alternative or a physical alternative is indicatively leading to a cost increase of respectively 11% and 32% compared to PFAS paper.

A follow up project will look into the full hazard profile of the identified alternatives.

## German mineral oil ordinance

Following the TRIS notification of the German Ordinance, comments were introduced by the Commission and Spain, the Netherlands issued a detailed opinion and many stakeholders shared position papers.

<https://ec.europa.eu/growth/tools-databases/tris/en/search/?trisaction=search.detail&year=2020&num=510>

The standstill period is extended by 3 months, until the 18 February.

## Food Contact Chemicals Database

The Food Packaging Forum published the 30/11 a comprehensive database of food contact chemicals (FCC).

A scientific article “Overview of intentionally used food contact chemicals and their hazards” and the entire database can be freely downloaded:

<https://www.sciencedirect.com/science/article/pii/S0160412020321802?via%3Dihub>

<https://zenodo.org/record/4296944#.X>

Based on 67 FCC lists from publicly available sources, the database contains 12 285 substances possibly used to make food contact materials/food contact articles. Using authoritative sources of hazard information, 608 FCCs are prioritized for further assessment and substitution in FCMs/FCAs.

The largest numbers of hazardous substances are found on global inventories for printing inks (377), plastics (325) and paper/board (256).

In the ECMA Food Safety Committee meeting (24/11) the decision was taken to develop guidance on how to address requests related to lists of chemicals of concern.

## FFI/PTS recyclability study

<https://www.ffi.de/ffi-pts-project-recyclability-of-folding-cartons-and-material-combinations/>

In the current social and environmental policy debate on closed-loop recycling and the recyclability of used packaging, brand owners and retailers, waste management companies, green dot schemes and policy makers are all ever more asking questions related to the recyclability of packaging and towards our sector the recyclability of cartons.

A comprehensive study by FFI provides a generic answer to those questions. A wide range of typical folding cartons from the food segments (dry food, frozen food, confectionery, tea/coffee, cereals) and non-food segments (cosmetics, pharmaceuticals) were tested. For these segments, also the common spectrum of material combinations, such as printing and varnish, outer and inner coatings, adhesive applications and windows were investigated as parameters influencing recycling.

The outcome of this study allows to confirm folding cartons are recyclable as part of the paper stream collected from private households. In addition to the carton samples also 4 paper cups were tested, and those were similarly assessed as recyclable in the mixed paper stream.

CEPI is currently developing a harmonised European test method for recyclability assessments. The outcome of the FFI study provides an excellent input into this debate and the 4Evergreen initiative.

