

German Mineral oil regulation

In the update the 18/08 we were reporting on the main content included in the notified German mineral oil regulation and shared some preliminary comments.

The Food Safety Committee has been discussing the regulation and adopted mid-September a position also publicly available from the ECMA website.

<https://www.ecma.org/uploads/Bestanden/Publications/Statements/ECMA%20Statement%20on%20the%20German%20Mineral%20Oil%20Regulation.%20%2010%20September%202020%20%20FV.pdf>

Well aligned with so many statements in recent years, the ECMA position is questioning the scope of the regulation and expresses once again the clear need to have harmonised European food safety legislation. We are all, in between very well aware the mineral oil contaminations are not only related to the use of recycled board and from a toxicological perspective there is no reason to adopt a measure on all categories of MOAH.

Action required

The notification procedure means the Member States can now issue comments or express detailed opinions until the 18/11 and in this perspective Mike Turner circulated the ECMA position to the National Associations asking for their support.

To ensure the opinion of the carton sector is well heard, the Member Associations are invited to contact the national FCM delegates at the Commission and share the statement.

Feedback on the responses would be appreciated !

Suppliers Questionnaire

Another core initiative which was finalised in the ECMA Food Safety Committee is the annexed suppliers questionnaire.

In different recent update mails (23/04, 6/08) the importance of accurate supply chain communication on food safety has been highlighted and guidance for the membership was announced.

The now adopted questionnaire is indicating which type of information is valuable to obtain from your board, ink, adhesive and plastic intermediate material suppliers.

ECMA members involved in food packaging are committed to food safety, but may not always have access to the necessary chemical expertise for a full understanding of what may chemically happen in the production lines and when the different materials used, are brought together.

For this reason, the text in the questionnaire contains two levels. The text related to essential questions is in black, while the questions asking for the full detail are marked in grey.

At its meeting the 17/09, the ECMA Food Safety Committee also discussed the effective use of the questionnaire. The document can't be used as such to all suppliers. It is more a guideline, a checklist when asking after accurate information.

As this is just the first version of this new document, we are looking forward to your comments !

Which other questions may be relevant? Your practical experiences when requiring more detailed information from your suppliers?

30th September 2020

