

# ECMA Food Contact Network Update



EUROPEAN  
CARTON MAKERS  
ASSOCIATION

## ECMA GMP Version 2.0

Last week the new ECMA GMP Version 2.0 was circulated towards the members and today ECMA is issuing a press release.

The introduction to the publication at page 4, explains well the new approach, compared to the previous Versions 1.0 and 1.1.

A performed benchmark exercise comparing the existing ECMA GMP, with the different public certification schemes, identified well the requirements which were in common and those which are specific for the own publication.

Based on this benchmark exercise and the existing obligation to have a third-party certified quality and hygiene management system in place before adopting the ECMA GMP, the decision was taken to develop a new GMP version without duplication of text included in the public schemes and the ECMA document.

With over 90% of the ECMA members having adopted the BRC Packaging standard as the starting certification, priority was given to develop guidance in relation to BRCGS Issue 6 Packaging.

The new ECMA GMP focusses on what is specific for carton makers and provides hands on practical guidance for the following 9 BRCGS sections:

- 2.2 Hazard analysis and risk assessment.
- 3.4 Product specifications.
- 3.7 Supplier approval and performance monitoring.
- 3.8 Product authenticity, claims and chain of custody.
- 3.9 Management of subcontracted activities and outsourced processes.
- 4.6 Equipment (Press cleaning).
- 5.2 Graphic design and artwork control.
- 5.6 Product inspection, testing and measuring.
- 5.8 Incoming goods.

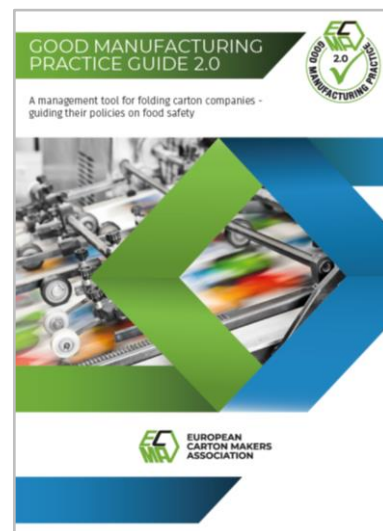
Out of the final discussion at the ECMA Food Safety Committee the 18<sup>th</sup> February it is valuable to share the following comments:

- The text does not include the clauses from the BRCGS standard. This means the user needs to read both documents in parallel.

The BRCGS standard is freely available: [www.brcgs.com](http://www.brcgs.com) > Store > Global Standard Packaging Materials Issue 6 > Format: Free PDF

- For now, the text contains guidance in relation to the BRCGS standard, the next update planned for later this year, will also cover FSSC 22000, the second currently used GFSI certification scheme in the carton sector.

- As for the existing GMP, members are invited to declare compliance. In return the company receives from ECMA a certificate giving the right to use the GMP food seal and to be listed on the ECMA website.



All already issued certificates related to the previous version, remain valid for this year. Next year the certificates will refer to the GMP Version 2.

- The new GMP will again be available from the ECMA website. This means the text, the provided guidance and examples are public.

Only the members have - via the members only section of the ECMA website - access to a number of additional detailed documents, such as the checklist to use with customers, the supplier questionnaire, the library with food contact updates and the template for issuing a food contact status declaration. Towards the ECMA members affiliated at national level, all information will be provided via the national associations.

- Currently the GMP is released in English. It will be discussed with the national associations to which extent translations are needed. A German version is currently already in preparation.

- The previous GMP document was more descriptive and remains for a number of topics a valuable source of information, for this reason the decision was taken to keep also Version 1.1 on the ECMA website. This document will however not be updated.

A presentation on the new GMP recently given at the PTS conference "Paper & Board for Food Contact" (3/03) is on demand, available for reuse.

### More content from the Food Safety Committee meeting 18/02

- Assessing the content of the [DG Sante webinar on the evaluation and revision of the EU rules on FCM](#) (See FC update 5/02) the following messages from the Commission Officers provide a good indication on certain aspects of the [current thinking at the Commission](#):

- . By the end of 2022, the Commission intends to have a text ready for new legislation.
- . An increased focus on the hazardous properties of chemicals can be expected, but particular substances will still be allowed hand in hand with an appropriate risk assessment.
- . The difference between IAS and NIAS substances will disappear.
- . The increased focus on the safety of the final article is impossible without a clear, comprehensive transparent communication system to pass on compositional information down the supply chain.
- . For the responsibility regarding substances, actors will need to depend on the supply chain. The necessary information needs to be shared already now.
- . A specific regulation on recycled paper and board will follow after the current work on recycled plastics.

- The proposal for restrictions on the [intentionally added microplastics](#) - now at the Commission - may have an impact on the carton sector.

It seems, dispersions will fall under the restriction. This means the water-based dispersions will be further allowed, but our sector will have to report towards ECHA.

- In the FC update 5/02, information was provided on the [French ban on mineral oils in packaging from the 01/01/2022 on](#).

A Ministerial Decree expected by the end of Q1 should further clarify which MO are in scope and if the measure covers aside the printing inks also the varnishes, coatings and adhesives. Recycled paper and board is not part of the measure, as the approach taken in France is to clean out the material loop at the source, if the contaminations are following the material in the recycling process.

Critical to be aware of, are the increased EPR fees in place for all paper and board packaging printed with mineral oil inks, already now in 2021.

Customers are paying a 50% higher fee to CITEO [also for non-food packaging](#) in case the packs are printed with conventional inks. For 2022 the ban will be applicable.

- Early February the [CEPI recyclability test protocol Version 1](#) has been circulated in the wider paper and board industry platforms.

<https://www.cepi.org/wp-content/uploads/2021/02/REC-21-003.pdf>

<https://www.cepi.org/wp-content/uploads/2021/02/REC-21-002.pdf>

Compared to the earlier drafts minor changes were made following the 150 introduced comments. (See FC update 10/11/2020)



The main included parameters for assessing the recyclability of paper and board articles are in between known: the coarse reject, the flake content, the macro stickies and the tacky and visual impurities. New in the final version is the parameter "percentage of dissolved and colloidal solids below 10 microns". Including this parameter allows a better assessment of the yield. The suggestion to for instance also include the mechanical properties of the recovered fibres - to somehow counter balance the visual impurities parameter more important for graphic paper recycling - has not been accepted. This CEPI recyclability test protocol is currently further discussed in the 4Evergreen project (Workstream 1).

Additional specific tests may be adopted for certain types of paper and board packaging e.g., layered paper and board materials and wet strength. In view of the expected growth of layered cartons - as a substitute for plastic - It is essential to find the right solution-oriented balance between the existing market opportunities and the interests of the recyclers.

- The Food Contact Chemicals Database developed at the Food Packaging Forum (See FC update 22/12/2020) is a good tool for accessing information on substances, especially for those companies not having a Decernis account.

The database provides valuable information on individual substances. There are however many materials used as mixtures.

