



**EUROPEAN
CARTON MAKERS
ASSOCIATION**



Statement on the European Commission's draft regulation on the use of Bisphenol A and other bisphenols & their derivatives.

ECMA is the international network of folding carton organisations; cartonboard mills, folding carton businesses, national folding carton associations and suppliers to the carton industry.

Pro Carton is the European Association of Carton and Cartonboard manufacturers

We closely follow all developments regarding food safety issues and awareness on the concerns related to BPA have been regularly communicated with existing supplier questionnaire templates already containing specific questions on avoiding the intentional use of a number of substances of concern, including BPA.

It is premature to issue a sector position on legislative work in progress, however should the currently available version be adopted we see the folding carton and cartonboard sector's responsibility, as follows:

- Folding carton converters need to obtain from their suppliers (cartonboard, inks and varnishes, adhesives) a declaration of compliance that BPA and other bisphenols and their derivatives with a similar toxicological profile are not intentionally used.
- Based on this information from upstream in the supply chain, the folding carton maker can declare compliance towards the food product customers.

The monitoring for the presence of unintentional BPA in recycled paper and board should be carried out by the mills producing the recycled paper and board.

Given the widely used BfR Recommendation XXXVI in the paper industry, this control is already common practice in many board mills, especially for wet and fatty food contact packaging.

From a conceptual perspective, further discussion on this BPA regulation - with regard to the monitoring - might consider the use of the cartonboard containing recycled fibres.

Bisphenols are non-volatile, which means that migration only occurs in direct contact, with mainly moist and fatty foods.

Given the ban on the use of BPA, contamination levels are already falling and monitoring could be limited to only those applications where there is a risk of exposure.

9 April 2024

ECMA, the European Carton Makers Association
Contact: Mike Turner, Managing Director
Tel. +31 70 312 39 11

PRO CARTON, the European Association of Carton and Cartonboard manufacturers
Contact: Horst Bittermann, Director General
Tel. +43 664 852 74 58