

Food safety presentation

Annually at the ECMA congress, an update is given on the work of the Technical Committee in the past year.

Annexed you will find the presentation as prepared for this year's conference in Malta (18-20 September). All topics presented have been covered previously in the detailed food contact update mails, except the information on new barrier solutions from the CPT experts (Centre Technique du Papier) at the TC meeting the 25th June in Grenoble.

The new barrier solutions based on the, Micro Fibrillated Cellulose and Chromatogeny technologies, may for some applications form, one of the alternatives for the plastic layers and for certain - from a food safety perspective questioned - surfactants.

On slide 13, an overview is given of the type of barriers (water, grease, water vapour, oxygen, contaminants & aromas) the new solutions can provide.

More background is available on demand.

This type of update presentations will from now on, also be shared via the members only section of the ECMA website.

Recyclability guidelines

Since early January, ECMA is closely following in the CEPI/CITPA platforms, the development of the recyclability guideline for paper and board packaging.

At this stage it seems not possible anymore to further influence the annexed version (25th September).

Compared to the initial drafts a number of improvements have been obtained: the negative messages on the recyclability of hotmelts and UV varnishes are out and for the parameters to assess the recyclability of paper and board packaging, the fibre yield and the technical quality, were added. This widened number of parameters (aside repulpability, coarse reject, flake content and stickies) allows to better demonstrate the value of certain well repulpable layered cartons in the recycling loop.

For the wording on the paper composite packaging, the outcome is acceptable.

In describing the collection from end-users and the sorting practices (p9,) liquid packaging and other composite packaging are still assimilated, but when describing the activity at the specialized paper recycling mills (p8 and p10) the text is now much better.

In this latest version (25/09) only the paper composite packaging which cannot be handled in a standard process should be delivered to specialized paper mills in EN 643 identified flows, which is fair.

Within the section "Regulatory and normative framework and industry practice" (p7) we were not able to avoid the mentioning of the derogation, which Member States may adopt in their reporting on the recycling of composite materials.

According to the Commission Implementing Decision (EU) 2019/665 of the 17th April 2019

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019D0665&from=EN>

Member States will have to report on the recycling of composite materials, for each material separately.

Member States may nevertheless derogate from this rule when a material is below 5%.

In discussions, it needs to be well explained there is no link between this legal reporting requirement for the Member States and the assessment of the recyclability or the need to have layered paper and board packaging in a different collection stream !!!

EU consultations

Different consultations have been or are currently still out, in relation to studies for the Commission on food safety and sustainability.



A short overview:

- The draft outcome of the consultation on the evaluation of the food contact materials legislation was presented in a stakeholders workshop on the 9th September by the involved consultant Ecorys. The working document used at the event is available on demand.
ECMA brought in the course of this consultation process constantly the same points forward :
 - A clear preference for harmonised legislation in order to create a level playing field on food safety, to create more operational certainty and to have less unnecessary public debates and scares.
 - Positive lists with just well by EFSA evaluated and authorised substances for all the materials we are as converters using, is not feasible. Rigorous assessments by the industry according to well defined and checked procedures and shared in a transparent database, should also be accepted.
 - Accurate real open communication in the supply chain is vital! Without information on what is used by suppliers, only a costly full screening of substances is left.
- ...
- DG SANTE launched a survey on the current use of phthalates in food contact materials. <https://ec.europa.eu/eusurvey/runner/phthalatesFCMsurvey2019>
This consultation should be completed by the 25th October.
- The Single Use Plastics Directive is very well covered in the ECMA Coated Board Forum and on the SUP consultation <https://www.survey-xact.dk/LinkCollector?key=KCUDZ2J5L595> guidance was circulated by Mike Turner (ECMA Managing Director) to the general membership. From CITPA we learned how further input even after the 4/10 deadline, by the 15/10 will still be taken in account by the consultant Ramboll. New last week was the information circulated by CEPI on the outcome of their 3 workshops organised with brand owners and retailers, research institutions and companies from different levels in the value chain. The circulated document "Technical guidance on SUP Directive regarding circular paper-based products in combination with polymers" contains a very helpful description for "the main structural component", part of the definition of a plastic, given in Article 3 of the Directive. <https://eur-lex.europa.eu/eli/dir/2019/904/oj>

a) The polymer IS NOT a main structural component of the final product if *the final product is repulpable/readily disintegrates in repulping with no structural plastic layers remaining and without negative influence on the resulting paper quality and papermaking process efficiency.*

b) The polymer IS a main structural component of the final product if *the cohesive strength of the chemically modified polymer in repulping is stronger than the adhesive strength between the paper and the polymer layer.*

c) The component is not a main structural component of the final product if *the component is less than 10 per cent (w/w) of the final product.*

Whilst any given percentage does not define product's behaviour with regards to recyclability or composting, as a cut-off rule 10 per cent is suggested. The value chain acknowledges the gradual progress made in material technology and would commit to linear reduction of the %-share from 10 per cent downwards, subject to review in 2026, while the industry commits to finding the material alternatives for plastics with reduced environmental impacts.

This interpretation and assessment, may - if accepted - mean articles with a layer below 10% could be considered as out of the SUP scope.

- Eunomia is performing a study for DG Environment on the essential requirements, part of the Packaging and packaging waste directive. Also, for this study a short consultation process was opened. Especially the broader industry platforms such as the Packaging Chain Forum in which CITPA is involved, have been contributing in line with their issued position papers. (Available on demand)

