



**EUROPEAN
CARTON MAKERS
ASSOCIATION**

ECMA STATEMENT ON BARRIERS

September 2023

In recent years, packaging sectors have been faced with divergent and even opposing policy orientations. From the green perspective, unnecessary packaging should be avoided, and packaging materials need to be sustainable, circular, and recyclable. Depending on the type of application, it may however be necessary to protect the food from the migration of substances. In this aspect, fewer packaging layers, recycled and mono materials are favoured, while in other legal provisions an extra barrier is recommended to protect the food.

It is important to clarify the wording. Aside from the type of physical barrier to avoid direct contact between materials, layers can act as absolute barriers or as functional barriers to migration.

Well known absolute barriers are glass and aluminium, avoiding the migration of any type of substances hence offering a full protection of the food.

As in the Technical Guide on Paper and Board published by the Council of Europe, a functional barrier can be defined as a barrier to migration consisting of one or more layers of any type of material that ensures that the final material or article in use, complies with the well-known Article 3 of Regulation (EC) No. 1935/2004. This may be achieved by a layer in or on the paper or board, or as a separate internal bag.

In general, the sector fully supports the idea, to avoid extra packaging layers and for recyclability reasons to avoid barriers applied on the reverse side of carton board packaging, which are not easily separable in the recycling process.

It is however up to the leading Food Safety Expert Panels, to determine which migration limits should be met and for which applications barriers are necessary, preferably at a European harmonised level.

Essential for the risk assessment of food packaging is the open communication in the supply chain.

As migration is dependent on many parameters, customers need to share information on e.g., the type of food packed (consistency, dry moisty or fatty), the processing of the product and the use of the packaging (heating and storage conditions).

In food sector supply chains, it is also essential to communicate on the overall packaging concept. Are there other layers between the carton and the food and what is the composition of those other packaging components...any changes in this composition should be shared.

This information allows the carton maker to suggest the correct material selection and to deliver packaging, appropriate for the well-defined intended use, while it remains the responsibility of the packer to determine, based on the actual composition of the food, the suitability of the packaging.

To facilitate the food safety communication in the supply chain, ECMA has a customer checklist available and on the barrier properties of different materials, it is recommended to consult the annexed overview tables of barrier films which were included in the (not published) draft JRC Technical guidelines for compliance testing in the framework of Regulation (EU) No 10/2011 on plastic food contact materials.

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