



German Mineral Oil Regulation

As mineral oil contaminations can originate from different sources and the toxicological concerns relate to certain categories of MOAH, ECMA is questioning the scope of the German Mineral Oil Regulation.

Consumer health and safety is a top priority in the carton industry. Following the well-known report of the Zurich laboratory mid-2010, ECMA has closely followed the mineral oil issue and developed several layers of solution-oriented guidance for its members.

Since the aforementioned alarming report, our industry and all actors involved in the food supply chains have however gone through a learning curve.

- Within the sphere of responsibility of our own sector, we discovered that mineral oil migration was not only related to the use of standard recycled cardboard. First the used inks and afterwards certain adhesives were identified as additional sources.
- The mineral oils found in food can come - sometimes to a large extent - from many different other sources. The ingredients used in food may already be contaminated, leakage of lubricants in the production and handling processes and also the transport and storage conditions may contribute to the contamination.
- From the toxicological point of view, not all mineral oils are a proven health problem. The main concern relates to certain carcinogenic and genotoxic substances which may be present in the aromatic hydrocarbon fraction of mineral oils (MOAH), more specifically the polycyclic aromatic part, the MOAH with three or more aromatic rings.
At leading food safety conferences, it was indeed stated how the composition of the detected MOAH fraction is more important than the quantity.

Based on this knowledge, ECMA is questioning the scope of the German mineral oil regulation. It sounds unfair to just develop a measure on the mineral oil migration originating from recycled paper and board.

Many different sources are involved and an overall assessment was for instance the objective in the Commission Recommendation (2017/84) to the Member States to monitor the mineral oils. The benchmark levels recently established by German local authorities together with the food industry also cover the entire contamination present in food.

From a toxicological point of view, the core problem needs to be addressed. If MOAH is detected, the safety assessment should be linked to a more in-depth analysis, verifying that the polycyclic aromatic MOAH are not present.

In addition to the elements already introduced, it is from an industry and business perspective, important to have clear harmonised European legislation and it can be assumed that there has been a significant reduction in the migration of mineral oils.

A patchwork of national measures creates uncertainty and entails additional costs. Numerous recommendations have been issued in the own sector and by many industry associations in the food supply chains, leading to reported lower mineral oil contamination levels.

ECMA, the European Carton Makers Association

Contact: Mike Turner, Managing Director
Tel. +31 70 312 39 11; E-mail: mturner@ecma.org

