

# FOOD CONTACT GUIDELINES

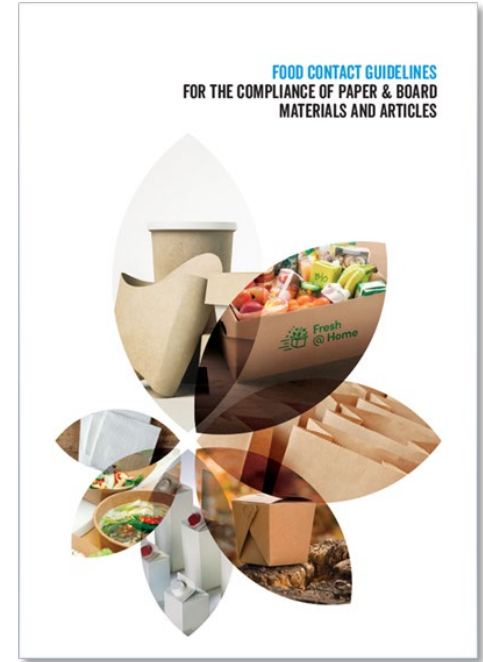
## FOR THE COMPLIANCE OF PAPER & BOARD MATERIALS AND ARTICLES

CPI Biennial Health, Safety and  
Industry Conference

9 July 2019

# Agenda

- Food Contact Guidelines
- Good Manufacturing Practice
- New tools
- Next steps



**FCCG:** Food Contact Coordination Group – a joint forum between papermakers, the converting and tissue manufacturing associations

# Introduction

- A voluntary guideline
- Providing guidance to show compliance with the Framework Regulation 1935/2004 on food contact materials and articles
- Absence of a specific measure for fibre-based materials and articles
- Starting point whenever the European Commission decides to choose paper & board as their next priority for regulation
- In replacement of the old voluntary guideline dated 2012

# Our work in figures

- 4 years activity (kick-off meeting 1 April 2015)
- 18 plenary meetings of the FCCG
- 3 meetings of the Editing Group
- 10 Working Groups
- ~20 Members of the FCCG actively involved
- 58 pages (vs. 30 pages in the old guideline)
- ..... and a **countless** number of emails.



# Associations involved

## Old Industry Guideline

- **CEFIC** (suppliers of chemicals)
- **CEPI**
- **CITPA**
- **FPE** (Flexible Packaging Europe)

## Food Contact Guidelines

- **ACE** (beverage cartons)
- **CCB** (container board)
- **CEPI** (paper makers)
- **CITPA** (P&B converters)
- **ETS** (tissue)
- **ECMA** (carton makers)
- **FEFCO** (corrugated packaging)

# The context

- Single Use Plastics Directive pushing for substitution and increasing market demands
- European Commission evaluation of the existing FCM&A legislation
- Any attempt to harmonise non-harmonised FCM postponed
- Divergent national measures and mutual recognition not working
- A guidance document for companies needed

**It is the right time to publish these new Food Contact Guidelines!**

# A bit of history

The activity of the FCCG during last four years was focused to the preparation of an approach for the harmonisation

The three-documents scheme

- 1) a specific regulation,
- 2) a Paper and Board guidance
- 3) a common GMP umbrella document

Same approach used in completely revising the old Industry Guideline

# “What” & “How” concepts

What?	How?	How?
<b>Reg. 1935/2004</b>		
<b>Future regulation on P&amp;B for food contact applications</b>	<b>Food Contact Guidelines</b> <ul style="list-style-type: none"><li>• Guidance/CEN standard</li><li>• Adoption: voluntary</li><li>• Implementation: customised, based on Risk Assessment</li></ul>	<b>GMP Guideline(s)</b>  Based on Risk Assessment



# In other words...



Authorities should set the height of the bar,  
industry should decide how to best pass it

# Food Contact Guidelines

## for the Compliance of Paper & Board Materials and Articles for Food Contact



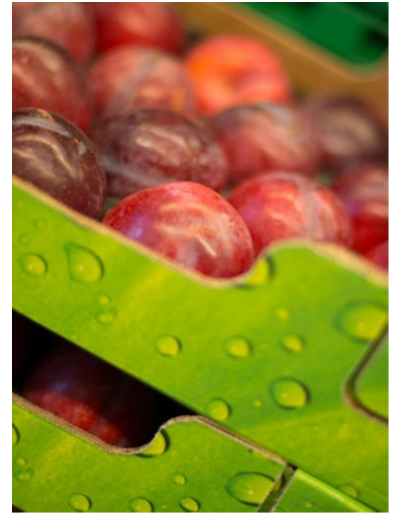
# The guidelines in brief

- Scope
  - > Paper & board
  - > Tissue products
  - > Converted paper & board articles
  
- Target audience
  - > Paper & Board supply chain
  - > National authorities
  - > Food supply chain
  - > Consumers



# Key points

- **Compliance**
  - > Risk management approach
  - > Compositional requirements
  - > Testing for compliance
- **Communication** (along the supply chain)
  - > Guidance on preparing the Declaration of Compliance (DoC) and Supporting Documentation
- **Good Manufacturing Practice** (Regulation 2023/2006)
- **Paper for recycling**
- **Traceability and Labelling** (according to Regulation 1935/2004)



# The outcome

## Meeting the goals – and more

### Goals achieved:

- ✓ **Help companies:** a practical, updated tool for daily operation
- ✓ **Support messages:** a tool to demonstrate the sector has a proactive food safety approach
- ✓ **Bolster one voice:** a strong, joint position in the value chain guiding future work

### In addition:

- Extends the scope from paper and board (substrate) to finished articles
- Includes also beverage cartons and tissue
- All industry behind the Guidelines

# Next steps 2019 - 2024

## Two tracks in parallel

### Food Contact Guidelines

- Launch and communicating
- Available in 8 languages
- Presentation to the European Commission and National authorities
- Presentations at conferences
- National promotion by associations
- Training of national authorities
- Survey on uptake

### Harmonisation

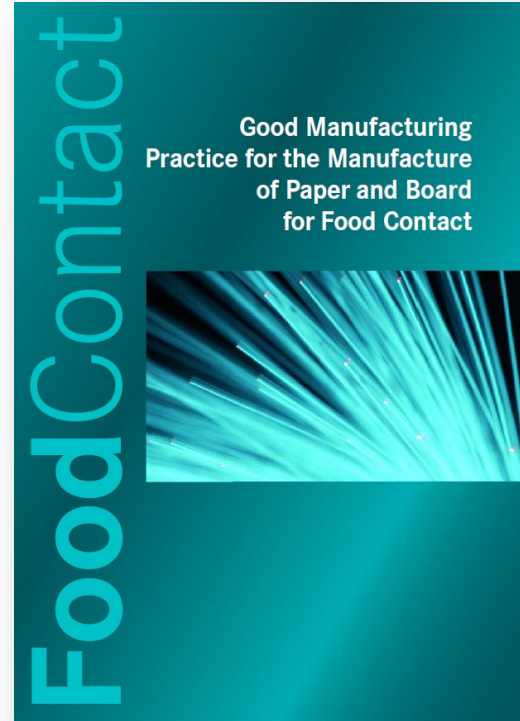
- CEN Workshop Agreement published by CEN
- CEN negotiations with the EU on mandating harmonised standards
- Resuming advocacy for a harmonised EU regulation

# Good Manufacturing Practice (GMP)

All subsectors have their own GMP



Link to the FEFCO GMP [here!](#)



Link to the CEPI GMP [here!](#)

# New tools: P&P VIS

Joint value chain information system with chemical suppliers

- Support for the compliance work
- Industry specific list of declarable substances
- Harmonised Questionnaire available for all
- An advanced IT-tool available for subscribers
- New companies are called to join in



More information [here!](#)



# New tools: Migration testing

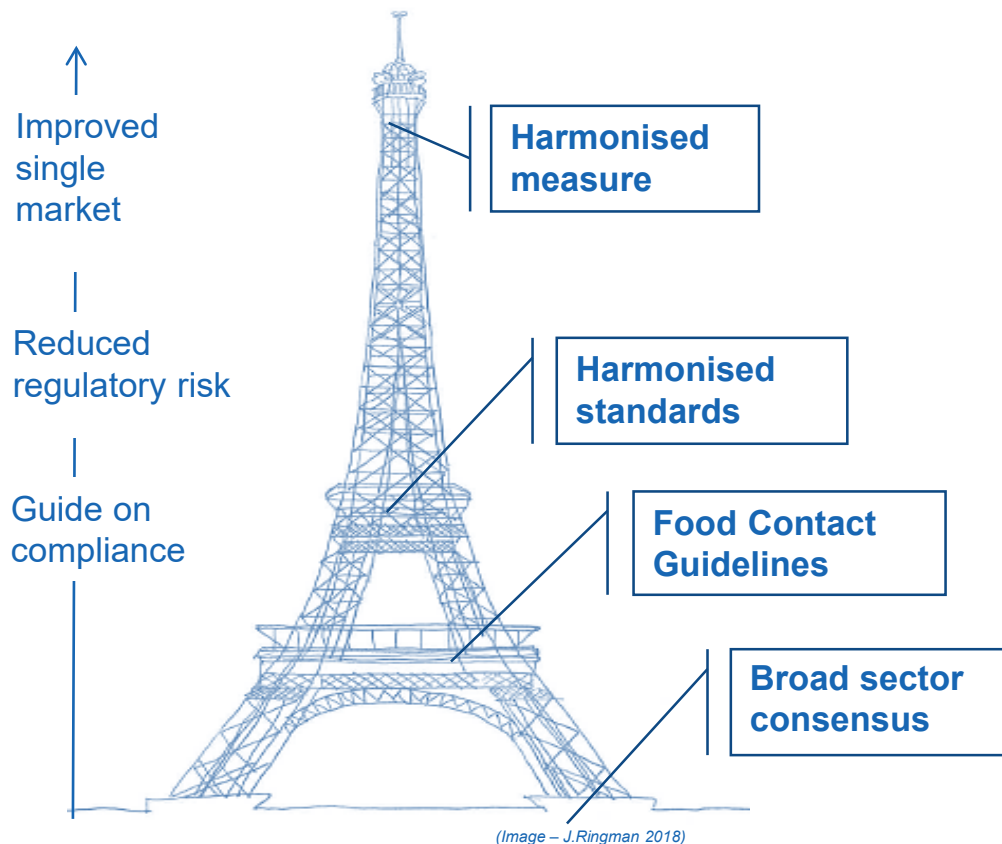
## Project

- Initiated by FEFCO
- Compliance of digitally printed corrugated boxes for food contact applications
- Testing methodology
- Collaboration with laboratory and suppliers



# Next steps

**Climbing higher  
until we are happy  
with the view!**



# Conclusions

- **Harmonisation is the preferred option**
- Uncertain when an EU specific measure for paper and board will be developed
- Framework Regulation (1935/2004) and the Food Contact Guidelines ensure a good level of consumer safety
- Risk Management approach is expected to be regarded as an essential tool for achieving food safety
- **Industry commitment to ensure consumer safety!**