

March, 2020

The Farm to Fork Strategy must ensure Safe Food in Safe Packaging

CHEM Trust supports the overall aim of the Farm to Fork Strategy to provide Europeans with *nutritious, affordable and safe food* and *ensuring a fair healthy and environmentally friendly food system*. We also very much agree that such aims must involve every actor in the supply chain.

In our view, in order for food to be considered safe, it must be uncontaminated. European citizens should have access to food without pesticide residues or any other harmful chemical contaminants. In this respect, it is very important not to overlook the widespread contamination of food which is caused by chemicals migrating from Food Contact Materials (FCM).

Every step in the food supply chain involves contact between our food and different FCMs. Storage containers, factory equipment, food packaging, and kitchen utensils are food contact articles made from FCMs which contain numerous chemical substances that can migrate into our food¹. Some of these chemicals are harmful to human health, in particular endocrine disrupting chemicals that can impact the hormone system already at very low doses².

In CHEM Trust's comments to the ongoing EU ED Fitness Check we pointed out in our response³ to the stakeholder survey that more protection is needed from EDCs and that the reform of the Food Contact legislation will need to play an important role in minimising exposures.

In April 2019, the European Parliament had made it very clear in its resolution on endocrine disruptors that they expect legislative proposals no later than June 2020 for specific provisions on EDCs to be added to the regulations for toys, cosmetics and food contact materials.

We welcome the aim of the Farm to Fork Strategy to "*significant reduce the use and risks related to chemicals pesticides*" while at the same time we wish to highlight that contamination from FCM, particularly the so-called Non-Intentionally Added Substances, the NIAS, may exceed other contaminants in food by a factor of 100 or more^{4,5}.

The current EU policy framework has failed to protect people from harmful chemicals in FCM. CHEM Trust has highlighted this fact many times in recent years⁶, including in a recent letter to Commissioner for Health and Food Safety⁷. We were grateful to receive a reply from the Commissioner⁸ stating that the Commissioner is keen to take action where necessary in order to maximise the protection of human health, and that she considers the area of FCMs extremely important in this respect. We expect this to be clearly reflected in the Farm to Fork Strategy.

On March 3rd a group of 33 scientists from around the world published a peer reviewed Consensus Statement⁵ expressing deep concern about the current use of harmful chemicals in food packaging and other Food Contact Materials (FCM).

This Statement was followed by a Declaration of Concern and Call to Action⁹, signed by CHEM Trust and more than 170 civil society groups from Europe, the U.S. and Asia calling on regulators to upgrade regulatory frameworks on FCM.

The timing of this clear statement from the scientific community is particularly relevant in the EU as the European Commission has recently conducted a (still un-published) evaluation of the existing EU legislation on FCM and must soon communicate to stakeholders about when and how it will take steps to improve the current situation.

In recent years, many stakeholders have been pushing for solutions to reduce packaging waste and reduce plastic pollution, but the discussions on these issues often do not take chemical safety into consideration. CHEM Trust strongly encourage the Commission to focus on avoiding the use of hazardous chemicals as well as taking steps to ensure reduced and sustainable packaging. The recent scientific statement clearly supports this approach.

The Farm to Fork Strategy roadmap states that the European Green Deal cannot be achieved without addressing food sustainability. We believe that a reform of the regulatory framework for FCM is an essential element in achieving the goals of both the Farm to Fork strategy and the European Green Deal as a whole.

We call on the Commission to ensure that the Farm to Fork strategy will commit the Commission to addressing the problems related to hazardous chemicals in FCM. This should include a timeline for the development of new, more protective and effective, legislation.

¹ CHEM Trust, 2018, “Hazardous chemicals in plastic packaging: how can we prioritise substances for action?”: <https://chemtrust.org/hazardous-chemicals-plastic-packaging-how-prioritise/>

² CHEM Trust 2018: “Phthalates: Research finds more worrying links with human health problems”: <https://chemtrust.org/phthalates-human-health/>

³ CHEM Trust 2020, Response submitted to EU ED fitness check <https://chemtrust.org/wp-content/uploads/CHEM-Trust-Submission-ED-Fitness-Check-Jan-2020.pdf>

⁴ Grob et al. 2006, “Food Contamination with Organic Materials in Perspective: Packaging Materials as the Largest and Least Controlled Source? A View Focusing on the European Situation, (46:529-35)”: https://www.researchgate.net/publication/6836185_Food_Contamination_with_Organic_Materials_in_Perspective_Packaging_Materials_as_the_Largest_and_Least_Controlled_Source_A_View_Focusing_on_the_European_Situation

⁵ Muncke J. et al. (2020) “Impacts of food contact chemicals on human health: a Consensus Statement.” *Environmental Health* 25(20). <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-020-0572-5>

⁶ Read more about the problems with the current EU FCM legislation at CHEM trust’s website: <https://chemtrust.org/food-contact/>

⁷ CHEM Trust, 2019 “We write to the new EU Health Commissioner urging action on chemicals in food contact materials”: <https://chemtrust.org/fcm-letter-new-health-commissioner/>

⁸ CHEM Trust 2020, “EU Health Commissioner confirms stakeholder concerns with food contact laws”: <https://chemtrust.org/kyriakides-reply-fcm/>

⁹ Declaration of Concern and Call to Action Regarding Plastics, Packaging and Human Health: https://zerowasteurope.eu/wp-content/uploads/2020/03/Declaration_Of_Concern_3March2020.pdf