

Public Consultation on the revision of EU rules on food contact materials (FCMs)

Fields marked with * are mandatory.

Introduction

Food contact materials ('FCMs') include all articles that come into contact with food during its production, processing, storage, transport, preparation and serving, before its eventual consumption. Examples include food packaging, kitchenware and tableware like cups, bowls and cutlery and appliances such as food blenders or coffee machines. It also includes items used in professional food manufacturing, preparation, storage and distribution like conveyor belts and tanks.

No material is completely inert and chemical substances, such as those used in the production of the food contact material may be present in the final article and may transfer to food, potentially resulting in exposure of people consuming that food. Current EU rules are in place to protect consumers and which aim to ensure an effective functioning of the EU market. More information can be found on our [website](#).

The Commission's findings of a recent [evaluation](#) of the current EU rules on food contact materials was published in June 2022, which identifies gaps and areas for improvement. This survey seeks your views on a revision of the current EU rules in order to address these gaps and to improve the current legislation.



About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

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* Surname

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* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* Organisation name

255 character(s) maximum

CHEM Trust

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

27053044762-72

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Åland Islands
- Djibouti
- Dominica
- Libya
- Liechtenstein
- Saint Martin
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
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- Bolivia
- Dominican Republic
- Ecuador
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- Equatorial Guinea
- Eritrea
- Estonia
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- Ethiopia
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- Finland
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- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Lithuania
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- Macau
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- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
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- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
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- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and
Nevis
- Saint Lucia
- United States
Minor Outlying
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
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Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

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Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

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FCM stakeholders

The following questions are for stakeholders with some knowledge of food contact materials (FCMs) and the relevant EU legislation. They cover the scope and main elements of the FCM Regulation that the Commission is seeking to revise, in response to the problems identified during the [evaluation](#) and commitments given in its various strategies. These concern **placing greater emphasis of the rules onto the final FCM article, prioritisation of substances** including the **most hazardous, supporting safe and more sustainable FCMs** and **improving supply chain information, compliance and enforcement**.

Scope of FCM legislation

Q1. To what extent do you agree that the following should be considered a food contact material or article and subject to safety rules:

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No opinion
* Paper napkins	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Kitchen paper towels	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Table cloths	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Table mats						
* Baby or child's bib						
* Kitchen work surfaces						
* Toys with a similar shape and form as real kitchenware						
* Interior of refrigerators						
* Dining table surfaces						
* Table or desk surfaces not specifically intended for eating						
* Kitchen tiles, splashboards, and other vertically mounted kitchen surfaces						
* Ovens and furnaces, excluding baking trays						
* Shopping bags /boxes available at food retailers						
* Plastic storage containers not marked as suitable for food contact (unlabelled)						

* Inkjet printers if used in combination with edible ink	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Lubricants used with FCM machinery	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Coolants used in food industry	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Fishing equipment (e.g. nets)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Serving trays	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Wooden chips or planks to smoke food	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Feeding tubes for medical purposes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

If necessary please add examples or elaborate your responses.

Q2. To what extent do you agree that FCM legislation should address the following:

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No opinion
* <i>Allergens</i> that may be present in FCMs (e.g. wheat straws)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* <i>Physical safety</i> of food contact materials (e.g. choking hazards, sharp edges)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>* <i>Hygiene and risks from bacteria and other microorganisms from the handling of FCM including reuse (e.g. in supermarkets or catering establishments)</i></p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* <i>Environmental concerns</i></p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Safety and Risk Management

The [FCM roadmap](#) foresees a ‘tiered’ approach to prioritising substances in FCMs including a ‘generic risk approach’ (GRA) for the most harmful substances, in line with the [Chemicals Strategy for Sustainability \(CSS\)](#), where decision-making is based primarily on generic risk considerations for certain hazardous properties of the substances. Depending on these properties, some substances would be prohibited, with the possibility for limited exceptions where their use is considered essential. Other substances may be subject to a more specific risk assessment at EU level, taking into consideration exposure from FCMs, whereas others would need to be risk assessed and managed primarily by the business operator.

Q3. On what basis should the following FCM substances be risk-managed:

Substances that are:	Priority 1: Generic approach to risk management (GRA)	Priority 2: Specific risk assessment (SRA)	Priority 3: Industry self-assessment	They are not relevant for FCMs	No opinion
* Genotoxic	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* <i>Known or presumed</i> to be carcinogenic, mutagenic or reprotoxic (CMR 1A and B)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* <i>Suspected</i> to be carcinogenic, mutagenic or reprotoxic (CMR 2)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* <i>Known or presumed</i> to be disruptive to the endocrine system (known or presumed 'ED')	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* <i>Suspected</i> to be disruptive to the endocrine system (suspected 'ED')	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Persistent, bioaccumulative and toxic (PBT) and very persistent and very bioaccumulative (vPvB)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Immunotoxic (adverse effects on the immune system)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Neurotoxic (adverse effects on the neurological system)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Toxic to a specific organ (single target organ toxicity or 'STOT')	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Skin sensitizers (able to cause an allergic response following skin contact)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* In nano form	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other types of substances or hazards (please specify below)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other types of substances or hazards, please specify:

Persistent, Mobile and Toxic (PMT) and very Persistent and very Mobile (vPvM)

Q4 (a). Regulatory intervention can be made at different stages in the supply chain and employ different tools to achieve its aim. For the different priority groups, indicate at what point you consider intervention most appropriate:

	Priority 1 substances	Priority 2 substances	Priority 3 substances	No opinion/ answer
Prohibition or restriction on the use of the substance(s) to manufacture FCM , even if they are not present in the final FCM article (e.g. substance X cannot be used to manufacture FCM)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Prohibition or restriction on substance(s) that may be present in the final FCM article , even if they can be controlled or migration is safe (e.g. substance X cannot be present in FCM)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Prohibition or restriction on substance(s) that migrate from the final FCM article into food (e.g. no migration of substance X allowed or an applicable SML)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Q4 (b). To what extent do you agree that the following tools are appropriate for the risk management of FCM substances:

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No opinion/ answer

* Overall migration limit	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Purity criteria for substance(s)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Specific conditions of use for substance(s)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requirement to identify substances and other information requirements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Traceability requirements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Labelling requirements for the end user of FCMs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Testing requirements and other methods for measuring single substances and groups of similar substances	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Testing requirements for all potentially migrating substances (multi-analyte methods)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Mandatory registration of businesses	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Sustainability and Future Developments

Sustainable development is a priority objective for the EU’s policies and features in the Farm to Fork Strategy. The following questions concern sustainability of FCMs.

Q5. To what extent do you agree with the following:

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No opinion/ answer
* Prohibiting the most hazardous substances in the revised legislation is sufficient to address sustainability as it will contribute to the core sustainable development goal (SDG) of ‘good health and well-being’	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>* FCM legislation should prioritise and incentivise sustainable FCMs to support the functioning of the EU market (e.g. including harmonised safety rules on bio-based materials, reuse and recycling)</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* FCM legislation should require that information relevant to sustainability is made available, e.g. energy and other resources used in production and recycling levels</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* FCM legislation should include requirements on sustainability of FCMs, as well as safety</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>* Environmental legislation (Packaging and Packaging Waste, Eco-design, Sustainable Products Initiative) and the Framework for the Sustainability of Food Systems should achieve sustainable use of FCMs, not the FCM legislation</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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* Q6. In your view, which aspects of sustainability of FCMs should be assessed?

- Sustainability of product only (sustainably sourced and produced)
- Lifecycle-based assessment ([LCA](#))
- Broader societal framework
- Impact on environment only
- Socio, economic and environmental impacts (three pillars of sustainability)

Q7 (a). How do you see the market for the following materials develop in the next 10 years?

	Increase significantly	Increase to some extent	Stay the same	Decrease to some extent	Decrease significantly	No opinion
* Plastics or other polymers originating from non-fossil fuel sources (e.g. bioplastics)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Materials derived from natural or plant-based sources not including paper and board (e.g. wood, bamboo, cotton [textiles])	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Materials that are biodegradable or compostable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Paper and board from primary materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Paper and board from secondary (recycled) materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Plastic from primary materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Plastic from secondary (recycled) materials	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Active and intelligent FCM	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Q7 (b). Are there any other types of materials or other new or emerging technologies that you consider should be regulated at EU level? Please motivate your answer:

We do not see any additional materials but want to stress that the revised legislation should include harmonised legislation for all materials that are currently included in Annex I of Regulation 1935/2004. The legislation should also be flexible enough to cover new materials without any bureaucratic delay.

Q8. In your views, what are the main elements that support innovation of FCMs?

The most important element supporting innovation and to achieve safe(er) FCMs is strict regulation of hazardous substances in FCMs. The European Chemicals Agency (ECHA) concludes in its study on the impacts of authorisation and restrictions under REACH, that regulation is the main substitution driver. Therefore, bans and restrictions of substances of concern in FCMs are crucial. Due to the uncertainties related to the delay of the Commission's REACH proposal, the generic risk management approach, i.e. the prohibition of substance of concern in FCM should be included into the FCM legislation to work even if the REACH regulation will not be passed in 2024.

An additional element supporting innovation is transparency in the FCM supply chain. All actors must have access to information on the (remaining) content of hazardous substances in FCM to make informed choices on their input materials and hence influence the market demand. The current system is not sufficiently transparent and FCM producers (downstream) lack information on the identify of chemicals in their input materials (and hence their own products).

Legal provisions must be enforceable and actually enforced in order to create a level playing field and reward those actors that innovate and replace hazardous chemicals in the products with non-hazardous or at least less hazardous alternatives. This is supported by simple requirements: a ban can be enforced either by checking supply chain communication documents (does not catch NIAS) or by chemical analyses on the content of a substance in an FCM. Restrictions with conditions and the existence of several, non-harmonised national legislation are challenging for companies and for enforcement authorities. A strong innovation driver from the enforcement side is important, hence, requirements in the FCM legislation should be simple to enforce.

Finally empowering consumers to chose FCMs that do not contain chemicals of concern supports innovation by creating a positive market power. Consumers will buy more (food packaged in) FCMs that are free from hazardous chemicals than FCMs of which it is made transparent, e.g. via labels, that they contain chemicals of concern. Hence, transparency towards the consumer is another important element to incentivise innovation under the FCM legislation.

Information along the Supply Chain

Objectives D and E of the [roadmap](#) seek to pursue the objectives of improving quality and accessibility of FCM production chain information and supporting this with a system that better ensures compliance and enforcement.

Q9. Concerning demonstration of compliance in the FCM production chain, to what extent do you agree with the following:

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No opinion/ answer
* The current declaration of compliance (DoC) (e.g. for plastic FCM) and requirements for information passed in the supply chain are satisfactory	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* A DoC should be mandatory for all FCMs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The DoC should be based on a fixed format with obligatory fields	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An approval step of the final FCM article will improve compliance and safety along the supply chain	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An approval step of the final FCM article will improve marketing and commercial benefits for businesses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

<p>* Full information on the composition of products shall at all times be easily available to competent authorities throughout the supply chain</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* The supply chain should provide manufactures of final food contact materials with complete information on substances potentially migrating above 10 ppb, whether those are intentionally used or not</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* Compliance information and usage indications can be made available at a batch level for intermediate FCMs</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* Compliance information and usage indications should be made available on individual final articles</p>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The permitted use shall be clearly indicated but disclaimers disallowed	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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Q10 (a). To what extent do you agree that the following *information* should be required to pass from one business to the next in the production chain, to determine the eventual compliance of the final FCM article:

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No opinion/ answer
* Identity of substance(s) used to manufacture FCM	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Identity of substance(s) used in the processing or conversion of FCM	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Identity of substance(s) generated adventitiously in the production process (e.g. degradation or reaction products)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Identification of hazardous properties and/or other toxicological information of the identified substances	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* A statement that substances of a high concern (genotoxic, CMRs, EDs) are not present in the product	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Physical and chemical properties of the identified substances	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Stability and reactivity of the identified substances	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Expected migration	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Exposure data to the identified substances including from other sources besides FCM	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Restrictions or limitations of the material(s) as regards the food (s) with which it is intended to be brought into contact	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Restrictions or limitations of the material(s) as regards the time and temperature of treatment and storage in contact with the food	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Analytical testing to demonstrate the level of substances in the material	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Analytical testing to demonstrate the level of substances that may migrate into food	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q10 (b). What other information should be required to pass from one business to the next in the production chain? In particular, what toxicological information should be provided for tier 3 substances?

Q11. Concerning a *system* for transfer of information in the supply chain, to what extent do you agree with the following:

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No opinion/ answer
* A DoC and documentation supporting compliance (supporting documentation) should be contained and transferred within a digital or electronic system as opposed to a paper-based system	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There is already a digital information exchange system such as radiofrequency identification (RFID) or machine readable information (QR) in place in my FCM production chain (or will be in the near future) that can be used to pass safety-related information related to FCM	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

<p>* Each individual FCM article should have a QR code or equivalent to give information to users of FCMs, including food businesses and consumers and to control authorities for enforcement purposes</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
<p>* The system must prevent disclosure of commercially sensitive information in the supply chain, e.g. by using notified bodies/ third parties</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* A centralised digital system should be established for exchange of compliance information</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* A decentralised digital system should be established for exchange of compliance information</p>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q12. Concerning the roles and responsibilities of different actors, to what extent do you agree with the following:

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	No opinion/ answer
* FCM legislation should clearly identify to which actors (manufacturers of starting substances, convertors, final FCM article producers) specific rules or information requirements apply	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Notified Bodies should be used for the verification of compliance and would help businesses to ensure safety	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Notified Bodies would help businesses reduce costs of placing their products on the market in the long term, particularly for SMEs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

<p>* Member States competent authorities should carry out regular physical and documentary checks on FCMs</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<p>* Member States competent authorities should be supported by the use of delegated bodies as provided by Regulation (EU) 2017/625 for official controls</p>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Q13. Please upload any additional documents (e.g. position papers) to support your contribution to the consultation.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

5887534f-3bf6-425b-b34d-46e2ed703108/CT_comments-FCM-Jan23.pdf

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