



Join us in calling for toxic-free food packaging

Have your say on the EU Commission's plans for reforming EU legislation on FCM, before January 29th

Did you know that there are **thousands of chemicals in food packaging**, and many of them are unregulated and polluting your food and your environment? If the wider public knew the variety of hazardous chemicals, including hormone disruptors, PFAS and bisphenols, that the current EU legislation still allows in materials that are used for food, they would be shocked.

A broad coalition of consumer, health, and environmental NGOs has been exposing the gaps and flaws of the current EU legislation on Food Contact Materials (FCM) and have been advocating for a new legal framework based on ['Five Key Principles'](#) to ensure basic safety.

New promising political commitments must be turned into regulatory action

As part of the European Green Deal, the Commission has finally committed to ban the most hazardous chemicals from consumer products including FCM and to revise the FCM legislation. This is a significant milestone.

As a first step, a public consultation has been launched to allow all stakeholders to give feedback on the Commission's initial roadmap. It provides an important opportunity to call for safer and more sustainable food packaging as part of achieving a toxic free circular economy. We encourage all NGOs working to protect human health and the environment to respond to the consultation. We need to call for swift action to ban the most hazardous chemicals, such as the endocrine disruptors, and for a completely new regulatory framework to ensure safe food in safe packaging.

Take action. Now is the time to tell the Commission that we need a ban on the most hazardous chemicals in FCM, and new efficient legislation to cover all chemicals in food contact materials.

You can help by:

1. Responding to the public consultation on the Roadmap before 29th January 2021
2. Distributing the call for action widely in your network as soon as possible

How can you respond?

The consultation's roadmap document describes the Commission's interpretation of the problems that are weakening the existing regulations and proposes some solutions under consideration. In addition, three basic options for the future are presented:

Option 0: No action

Option 1: Use the current regulatory framework as a cornerstone to solve the problems

Option 2: Develop a new regulatory framework to replace the current Regulation

You can reply by filling in a box of max 4000 characters. You can also upload a longer document with a more detailed response. You can tell the Commission that:

- 1) The EU needs to ban hazardous chemicals in all FCM to honour the commitments of the Green Deal and the new Chemicals Strategy for Sustainability.
- 2) Substantial changes are needed, and it is important that the possibility of creating better rules is not constrained by the limits of the current framework. Thus, Option 2 is the best choice.
- 3) You are also welcome to insert a link to the 5 key principles in your response.

You can find this on the consultation website: <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12497-Revision-of-EU-rules-on-food-contact-materials>.

More details about the Commission's plans as outlined in the Roadmap

Positive points in the roadmap

- It is very important that new FCM legislation applies the precautionary principle and therefore implements a generic approach to managing risks. This would prevent the most hazardous chemicals (called tier 1 substances in the roadmap), such as **endocrine disruptors** and chemicals that are **carcinogenic or toxic to reproduction**, from being allowed in FCM.
- It is good that the Commission will focus more on the final food packaging or food contact article in the future. Today there is almost no control over the so-called NIAS, the Non-Intentionally Added Substances, which constitute the biggest share of the chemical pollution that migrates into our food from food contact materials. In essence, food contact materials should be sufficiently inert in order to prevent any hazardous chemicals from migrating into our food or leaking into the environment during its life cycle.
- The roadmap commits for better **protection of sensitive populations**, such as pregnant women and children. It also promises to consider the **combination effects** of chemicals.

Concerns related to the Commissions plans

- The IIA suggests devolving not only the work of providing information, but also a substantial element **of defining safety and monitoring compliance to industry bodies**, rather than public authorities. This is a worrying approach.
- The document does not say anything about the **consumer's right to know** about hazardous chemicals in the products they buy.

More information

- CHEM Trust blog about the IIA: <https://chemtrust.org/fcm-impact-assessment/>
- Health and Environment Alliance (HEAL) infographics on how chemicals in food wrappings can impact people's health - <https://www.env-health.org/chemicals-in-food-wrappings-can-impact-peoples-health/>
- Scientists' joint consensus statement about concern for public health due to hazardous chemicals in FCM: <https://ehjournal.biomedcentral.com/articles/10.1186/s12940-020-0572-5>

You can find other organisation's responses on the Consultation website as these are continuously uploaded.

For more information, or to sign your organisation on to the 5 Key Principles: Please contact eleanor.hawke@chemtrust.org