FCM regulation – how to reach safe articles

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FCM regulation – how to reach safe articles

The main principles in the FCM regulation

Responsibility in the supply chain

Compliance work and risk assessment

Control and inspection

Ideas to consider
Harmonised and partly harmonised material types

All FCM must be safe – no migration in harmful amounts, no damage of the food
The main principles behind the FCM regulation

Chemical producer
Producer / importer
Producer / importer
Producer / importer
Producer / importer
Food business operator / consumer

Chemical – starting material
Plastic polymer
FCM / packaging material
FCM / packaging material
FCM / packaging material
Food
Who is responsible for the safety of the final material?

Compliance work

Positive lists

Risk assessments

Documentation – flow

No approval of final articles

Public control and inspection of FCM operators in the whole chain
Hamonised and non-harmonised material types

All FCM must be safe – no migration in harmful amounts, no damage of the food

Framework regulation reg.1935/2004
Good Manufacturing Practice reg. 2023/2006

**Harmonised**
Plastic reg.10/2011
Recycled plastic reg. 282/2008
Ceramics (Pb and Cd) dir. 84/500
Some epoxy derivatives reg.1895/2005
BPA in coatings reg. 213/2018
Regenerated cellulose dir. 42/2007

**Non-harmonised** – MS regulation, recommendations, CoE, self assessments:
Improvements and possible shortcuts – for discussion

All FCM must be safe – no migration in harmful amounts, no damage of the food

Alternatives to EFSA assessments of specific substances?

Risk assessments from supplier of chemicals – relevant for food contact

Database of industry assessments?

Minimum hazard cut offs – eg. no CMR?

Information in the REACH registration, restrictions and authorisations to be used in the FCM assessment? Access?

FCM default included in REACH restrictions

Reevaluation of authorised substances – when new data, periodically, when assessed in other legislation?

Multiple use of substance – common assessment, allocation?
Thank you – looking forward to the discussions!