The need for new EU legislation on food contact materials

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Contents

- Introduction to chemicals in FCM and their migration
- Basic problems with the EU legislation on FCM
- Hazardous Chemicals in Plastic Packaging
- Five key principles for better legislation

https://chemtrust.org
About CHEM Trust

• A charity working at UK, EU & Global levels to protect humans & wildlife from harmful chemicals

• Working with scientists and decision makers, in partnership with other civil society groups

• Focus on endocrine disrupting chemicals

https://chemtrust.org
What are Food Contact Material?

Materials and articles, which:
• Are **intended** to be brought into contact with food;
• Are **already** in contact with food
• Can reasonably be **expected** to be brought into contact with food

**Important to know:**
• FCM contain chemicals that can migrate into the food
• Some of these are hazardous
Current FCM legislation

Overview of the EU legislative system for FCM. Published by; UK Food Standard Agency, June 2019, Biobased materials for use in Food contact applications.

Read more at Commission’s website: https://ec.europa.eu/food/safety/chemical_safety/food_contact_materials_en
Framework Regulation, Article 3

“Materials and articles... shall be manufactured... so that under foreseeable conditions of use, they do not transfer their constituents to food in quantities which could:

- Endanger human health, or
- Cause unacceptable change in the composition of the food, or
- Bring about a deterioration in the organoleptic characteristics”.

Some basic problems with the rules

Lack of harmonised rules for most materials
No specific harmonised EU rules on chemicals in most FCMs such as paper, board, ink, glue.

Lack of information transfer in the supply chain
No effective obligation to pass on information in FCM supply chains

Lack of information on the NIAS (Non-Intentionally Added Substances)
Chemicals formed during processing and storage, are not identified or tested, although they may migrate from the final Food Contact Articles in significant volumes

Lack of adequate safety data assessments
EDC properties etc. not included in routine assessment

Lack of control and enforcement
Due to unclear rules, vague placement of responsibilities, missing test methods,
The HCPP Project

Multi-year research project on Hazardous Chemicals in Plastic Packaging, including:

- Database on chemicals identified in plastic packaging
- Environmental risk assessment of benzyl butyl phthalate (BBP)
- Report on possibilities for replacing phthalates
- Study on health effects of phthalates
- Socioeconomic studies

Funded by the Mava foundation

Partners

- Food Packaging Forum, Zürich: Dr. Jane Muncke, Dr. Ksenia Groh, Dr. Birgit Geueke
- University of Gothenburg, Department of biological and environmental Sciences: Dr. Bethanie Carney-Almroth, Prof. Thomas Backhaus, Dr. Pedro Inostroza
- University of Gothenburg, Centre for environment and sustainability: Dr. Daniel Slunge
- Dr. Maricel Maffini, independent consultant, Baltimore, MD, USA
- New York School of Medicine: Dr Leo Trasande
- ChemSec: Dr. Anna Lennquist, Dr. Jonathan Kleimark
- Chem Trust: Dr. Michael Warhurst, Dr. Anna Watson
New Database, CPPdb

Data from 14 publicly available information sources on all types of plastic packaging

> 4000 substances

List A, substances which are **Likely** in plastic packaging: 906

List B, Substances which are **possibly** associated with plastic packaging: 3377

Key points from the study

Lack of available information on both use and toxicity was a major challenge for this work.

Many hazardous chemicals are used.

Lack of information may hamper recycling goals.

The phthalates were prioritised for further studies.

More information: [https://www.foodpackagingforum.org/hcpp-project](https://www.foodpackagingforum.org/hcpp-project)
5 Key Principles

• Principles for the future legislation on FCM

• Developed by CHEM Trust in cooperation with Food Packaging Forum, BEUC, HEAL, ClientEarth, EEB, Danish Consumer Council, US Breast Cancer Prevention Partners

• Published April 2019

• You can still sign on 😊

• More info: https://chemtrust.org/5-key-principles-fcm/
New EU regulation of chemicals in FCM must ensure:

1. A high level of protection of human health
2. Thorough assessment of chemicals in materials and final articles
3. Effective enforcement
4. A clean circular economy based on non-toxic material cycles
5. Transparency and participation

https://chemtrust.org/5-key-principles-fcm/
We are eager to see steps from the EU Commission.

Towards safe food in safe packaging.. i.e.

FCM without harmful chemicals, based on the 5 key principles

Thank you!