

CoE Technical guide on paper and board (2021)

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8th Meeting EFSA FCM Network



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PAPER AND BOARD

used in food contact
materials
and articles



EDQM
2021

Part I. Council of Europe Resolution CM/Res (2020) 9 on the safety and quality of materials and articles for contact with food

Adopted by the Committee of Ministers
on 7 October 2020 at the 1385th meeting of the Ministers' Deputies

PAPER AND BOARD USED IN FOOD CONTACT MATERIALS AND ARTICLES

Appendix: Guiding principles for food contact materials and articles

Part II. Technical guide on paper and board used in food contact materials and articles

PAPER AND BOARD

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EDQM
2021

Download

<https://www.edqm.eu/en/food-contact-materials-and-articles>

Document consists of:

- Resolution CM/Res(2020)9 on the safety and quality of materials and articles for contact with food
- Technical guide on Paper and Board used in food contact materials and articles EDQM 2021

Ad Hoc group Paper and Board:

- Members: experts from public + private sector
- Chair: Christa Hametner (AGES)

Voluntary work!

Introduction



Resolution CM/Res(2020) 9 on the safety and quality of materials and articles for contact with food and the supplementary Technical Guide (**TG**, "new version"), **supersede** the Policy statement concerning paper and board materials and articles intended to come into contact with foodstuffs **Version 4 dated 12.02.2009** ("old version")

It is aimed at:

- Industry (whole supply chain)
- Private and enforcement labs
- National authorities

Status: Legal and technical state of the art in Europe (agreed by all Ministers of the CoE)

The need for a new version

Background and reasons

- ↪ Previous version was from 2009: technical and scientific progress should be considered (e.g. the safety of recycling qualities)
- ↪ New EDQM approach and structure:
 - one resolution and guiding principles (annex) for all materials
 - + TG (e.g. for metals and alloys, paper and board)
- ↪ Integration of tissue paper, kitchen towels and napkins (POLICY STATEMENT CONCERNING TISSUE PAPER KITCHEN TOWELS AND NAPKINS Version 1 – 22.09.2004)
- ↪ List of substances (technical document No 1/2009): includes predominantly used, but not necessarily risk assessed substances

Important changes between old and new version



Old ResAP + Technical Documents

- Resolution on paper and board mat./articles: includes restriction limits for Cd, Pb, Hg (QM in mg/dm²) and pentachlorophenol (mg/kg)
- TD No.1: **List of substances used** in the manufacture of P&B materials and articles (not exhaustive, lots of substances were never assessed or assessment is not based on EFSA guideline or does not fulfil transparency criterions of the EC)

New resolution + technical guide (TG)

- Resolution for **all food contact materials and articles**
- Includes **no list** of substances used in the manufacture of P&B materials and articles (needs a modus of operandi and lot of resources), but has requirements

The „new“ guiding principles for all FCM

Appendix of the Resolution CM/Res (2020) 9

☞ General requirements

- Only those substances may be used which are authorised (EC), nationally approved by Member State Authorities, listed in current TG or are at least risk assessed according to defined criteria (see chapter risk assessment)
- ✓ Also applies to impurities and known or foreseeable reaction or degradation products
- ✓ Exclusion of CMR and nano substances (exemptions: no migration or existing authorisation/approval)
- Compliance with specific migration limits and overall migration limits set in the TG

☞ Risk assessment

☞ Labelling and traceability

☞ GMP

☞ Compliance documents supporting compliance and safety

☞ DoC

Some highlights of the Technical Guide (TG)

General requirements

- National regulations and official recommendations (Annex I)
- **SMLs (mg/kg food or food simulant)** for some constituents or contaminants listed in **Table 1, Annex II:** for Michler's ketone, BPA, PAH, benzophenones, phthalates, PAAs, Pb, under discussion: PFAS and Mineral oil hydrocarbons (MOH)
- OML: 10 mg/dm² (EN 14338, ÖNORM A 1123)
- Release of fluorescent witheners or colourants: score of 5
- Suitable microbiological purity and no transfer of antimicrobials

Specific requirements for recycled paper and board



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Some highlights of the Technical Guide (TG)

☞ Compliance testing

- Determination of specific migration into food

Results of **specific migration in food prevails over other methods**

- Conditions of testing
- Testing of barrier and adsorbent effectiveness
- Experimental testing with surrogate substances
- Detection of recycled material
- Overall gas phase migration using MPPO as a simulant (EN 14338 / ÖNORM A 1123)

☞ Supporting documentation and declaration of compliance



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Current tasks related to P&B/FCM of EDQM

- Technical guide on documentation supporting compliance and safety of food contact materials
- Procedures for creating, publishing and updating lists of official evaluated substances



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