



Paper and Board as FCM
The Italian approach to assessment

UPDATE: ongoing activity

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Paper and board*

specific rules on P&B based on

(1) positive lists,

Part A: Constituents (fibrous matter, fillers, auxiliary substances, and optical brighteners)

Part B: Processing aids

(2) compositional requirements

(3) purity requirements



* DM 21/3/73 +51 amendments , (also other than P&B)

Recycled P&B: restrictions

Recycled P&B are NOT ALLOWED FOR GENERAL USE

Rec P&B are allowed only:

- in contact with foods for which no migration test is prescribed in the EU conventional classification (i.e. no fatty, no liquid etc)
- provided the finished products comply with some **purity requirements** (lead and PCB)

Recycled P&B: restrictions

The only derogation to this provision:

- multilayer boards, with well-defined description (multilayer boards , at least 200 g/m² weight and with at least three layers (cover, intermediate, and direct contact layer); the layer in direct contact with foods must have a weight at least of 35 g/m²).
- In these products, the purity requirement of lead must be respected only for the layer in direct contact with food. (in practice the contact layer must be virgin)

Recycled P&B: restrictions

NB: These “derogated” boards may be put in contact only with the list of foodstuffs in art 27 bis (e.g., cereals, dry pasta, sugar, salt, shelled fruit, etc.).

NB: The description of the board for which this derogation applies does not fit with corrugated boards. (eg.no pizza boxes)

Recycled P&B: new program

A monitoring program on P&B in IT

- 100 samples of P&B
- From different suppliers (shops, market, online, wholesales etc)
- presence of contaminants (organic, mainly) coming from previous use (illegal use of recycled P&B?)
- To make available a scientific basis to the Competent Authority

Recycled P&B: new program

The analytical program is ongoing (the Lab is the NRL-IT on FCM , at the ISS)

A RA on the most frequent contaminants will be done

A revision of the relevant part of DM 21.3.73 on P&B is under discussion

NB: restrictions on organic substances (e.g. phthalates, aromatics, hydrocarbons, etc) is under consideration



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Thanks for your attention !

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