

Industry Guideline

for the manufacture of paper and board for food contact

The issue

The manufacture of materials and articles intended to contact foodstuffs is covered by EU Regulation 1935/2004. This Regulation is known as “Framework” legislation as it has general requirements applicable to all packaging materials e.g. glass, paper and board, plastics, etc. Individual materials are covered, in more detail, by “specific measures”. Such measures exist for plastics, regenerated cellulose film and ceramic cookware. No such measure has been written by the EU for paper and board. As a response to this legislative vacuum, a project, described in this Issue Sheet, is currently in progress to write an Industry Guideline for the manufacture of paper and board. The work is not in the hands of the EU but is being performed by the industry itself.

Background

The department dealing with food packaging within the European Commission has limited resources and has, for some time been concentrating on plastics-related issues.

In 2002, the Council of Europe (CoE) published a Resolution for paper and board intended for food contact. However, the CoE has a limited political mandate and the Resolution is not legally binding. A small number of member states have indicated that they would enact the Resolution but, so far, none have done so.

Although individual companies have always had compliance mechanisms in place, the paper and board food packaging industry, as a whole, has recognised the absence of a common system as unsatisfactory. Firstly, a degree of uncertainty about the product exists in the eyes of customers as, unlike plastics, there is no single, official, legal specification against which to claim compliance. In some market situations, this can give rise to discrimination against paper and board. Second, the paper and board companies themselves require some certainty. So, the possibility of uneven enactment of the CoE Resolution and the requirement to comply with multiple customer specifications are both regarded as undesirable and against the concepts of the single market.

The project

A consultation exercise across the whole paper and board packaging chain was completed in 2005 and the result was approval for the development of a voluntary Industry Guideline. The alternative possibility, of developing draft legislation for an EU Specific measure, was rejected. A working group, drawn from all sections of the paper packaging chain together with suppliers and converters, began work immediately. The working group members believe that paper and board is unlike many of the existing packaging materials, especially plastics. It therefore requires relevant controls so the working group is attempting to produce a methodology which steps back from the over-complicated chemical and migration testing scheme which operates for plastics. The concentration is more on end-product testing which, it is believed, offers true relevance to consumer safety. In particular, it is hoped to include the results of the recent, joint EU/Industry Biosafepaper Project. The objectives of the working group are stringent and the target for compliance has been set at least at the level of relevant, existing requirements, including the CoE Resolution and the German BfR Recommendation 36.

Status

A number of drafts have been published, two of which have been for consultation throughout the paper packaging chain. Currently, consultations on the Guideline are in progress with the Commission, certain member states and the food industry. Provided that there are no significant obstacles in the next few months, it is hoped to complete the Guideline by the end of 2008.

Additional information

Contact: John Swift, Chairman of the Working Group, John.Swift@sca.com or Nigel Barnwell, CEPI Technical Manager, n.barnwell@cepi.org

