



Food for thought

Jori Ringman-Beck, recycling and product director at the **Confederation of European Paper Industries (CEPI)**, explains why the time is right for the industry to take a lead on the issue of paper and board contact with food.

Jori Ringman-Beck

Prior to his appointment at CEPI in February 2005, Ringman-Beck was a civil servant in the European Commission and was political advisor in the European Parliament Environment Committee. Previously, he was a journalist and editor, and was Secretary General of a parliamentary group in the Finnish National Parliament.



Paper is no stranger to food. From tea bags to butter wrapping and dry food cartons to liquid packaging board, there is a multitude of food-related applications for paper and board products.

Untreated paper and board, which is what concerns us here, accounts for just under 3.5% of direct food contact packaging in value terms in the EU. The figure for coated paper and board is approximately 17%, although with such products, the direct contact surface is likely to be plastics or aluminium foil.

The health and safety implications of direct food contact are of course taken very seriously by the paper industry. When it comes to consumer protection, the sector has cooperated at national government and EU level for many years, and complies with EC regulation 1935/2004, which covers all materials that come in direct contact with food.

Compliance is less clear

This sounds fine until you realise that many of the materials that come into direct contact with food, such as cellulose film, plastics and ceramics,

are subject to additional, material-specific directives or measures which apply uniformly throughout the EU.

For paper, on the other hand, the picture is fragmented, with countries such as Germany, France, the Netherlands and Italy having legislation specific to their domestic producers, while other countries simply conform to the more general, non-material specific regulation 1935/2004.

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This is not to say that countries with specific legislation offer better protection to consumers. But if a food-contact packaging buyer asks the question to a paper/board supplier “do you comply with specific measures for paper and board?” the answer is likely to be “no” simply because such measures do not

exist on an EU-wide basis. This could be holding back the industry, particularly when competitors in plastics, for example, can give a seemingly more satisfactory response.

The unintended impression given to buyers is that compliance for paper and board is less clear than for other materials. There is also the concern that differences between national laws, regulations and administrative provisions concerning food contact safety may hinder the free movement of paper and board within the EU, and impede fair competition. Rules on mutual recognition of regulation in different countries do of course apply,

but such a system is not as user-friendly as it could, and should, be.

The Food Contact Guideline

So it is against this background, where concern is possibly being created by omission, that a European paper packaging value chain working group has

compiled the voluntary Industry Guideline for the Compliance of Paper & Board Materials and Articles for Food Contact (the Guideline). Following a meeting of stakeholders in Brussels this May, CEPI will also publish Good Manufacturing Practice (GMP) for the industry. Put simply, the Guideline spells out the rules, and the GMP describes a management system for those rules to be obeyed.

GMP is not an optional bolt-on to the Guideline. Regulation 1935/2004 requires that all food contact materials be made in accordance with GMP. GMP is a concept originating from the food and pharmaceuticals industry which covers all aspects of the manufacturing process, from the manufacturing steps themselves, to storage, personnel, written procedures, traceability, transport and complaint handling.

For companies in countries where industry-specific legislation already exists, the Guideline will act as an additional source of information, and if the Guideline becomes recognised by a particular national authority, the principle of mutual recognition would benefit operators who import material to that country.

The Guideline will refer to those aspects of quality assurance that are of most significance to the European Commission, namely to ensure that paper and board meets the quality standards appropriate to their intended use. This means they will not endanger human

health by causing an unacceptable change in the food's composition or deterioration in the food's organoleptic properties (the way it tastes, looks, feels and smells).

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CEPI's aim for a paper and board industry Guideline would be that it integrates with existing management systems, offers flexibility to allow for different processes and materials, facilitates straightforward auditing, is based on realistic risk assessment and above all is specifically applicable to the manufacture of paper and board food contact material.

So there should be nothing to fear for responsible producers, and no significant additional administrative burden. In some cases, the Guideline might reduce the testing burden, as it contains rules that will allow the reduction of testing frequency in certain cases.

A question has already been raised in the European Parliament this year about the lack of regulation regarding food contact materials, which makes this Guideline particularly timely. By the end of 2010, the European Commission will draw up a list of priorities for those materials not yet governed by specific measures.

It is believed that the concerns of EU member states and the food industry about recent food scares and the 'unregulated use' of recovered paper will

eventually drive the Commission to start work on a specific measure for paper and board. This is likely to be along the lines of plastics legislation with its emphasis on approved raw materials rather than GMP and fitness of end product, which the industry believes is more appropriate.

Voluntary regulation preferable

With all this in mind, the Guideline offers the preferable alternative of voluntary industry self regulation and there is now a short period of opportunity during which the paper and board industry can show that its own guidelines can deliver.

Standards for consumer protection are not fixed forever, so the Guideline allows for future developments, such as biological tests developed in a joint industry/EU R&D project known as Biosafepaper. This will certainly address some concerns regarding assessment of hitherto non-authorised substances found in recycled packaging.

The Guideline may later include 'correction factors' to allow for the fact that rules for limits on migration and contaminants may become more representative of the specific exposures that occur in paper and board packaging, where contact with food is often lower than with other materials, than of an artificial worst-case scenario based on plastics. The Guideline is a document capable of being modified quickly in the light of scientific advances.

The industry backs the Guideline. There have been two full internal industry consultations within the complete paper packaging chain and the Guideline was also peer reviewed by Pira International. Its time has come. ■



Many materials that come in contact with food are subject to specific directives, but the rules are less clear for paper.

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