

Food Regulatory Experts Panel

News #1



FREPnews is a rubrique which is published every two months. Focusing on Food Contact Materials and Plastics Packaging for Food, *FREPnews* is directed to not only experts in the field but also public at large.

Frepnews' main goal is to increase the literacy among people about these topics by sharing relevant and easily understandable information. *FREPnews* comes in addition to the brochure "The reasons of Plastics in Food Packaging".

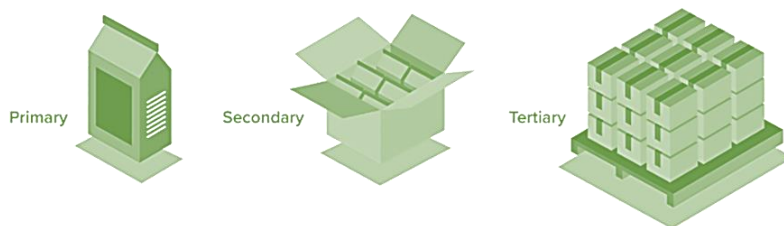
What is PACKAGING?

STATEMENT

As with any product, packaging provides several services to society. According to the law, packaging exists when a container and a content are placed together at the same time on the market of a Member State.

The law recognises 3 types of packaging:

- the **primary** packaging in direct contact with the content, as serving as a sale unit;
- the **secondary** packaging is collecting sales units;
- the **tertiary** packaging allows transport of the primary and secondary packaging. The shape of the tertiary packaging may be open, like a flat pallet.



Services to society

In the circular economy, service to society must be considered from the largest environmental impacts through resource use, duration of use, nature of the use, and reuse of the material at end of life.

This means that the environmental impacts of the container or the content, including their respective logistics and the use scheme of the packaging, must be taken into consideration.

- The first essential service provided by packaging is to **protect** the content from various **environmental pressures** like weathering, contamination, decay, shocks, etc. These protective properties will design the maximum lifetime of the packaging.
- The second service is to provide **information** for use of the content including disposal, nutrition score, and composition. This service will define the frequency of use.
- The third service is to provide **handling** of the content, including the shelf lifetime.

The container is made of various material, but the main component is glass, cardboard, wood, plastic, ceramics, aluminum, or steel.

For a circular economy: legislation & concerns

The circular economy paradigm extends the provisions from the packaging to the production and the use of the packaging including the multiple valuable circularities of the container.



This new paradigm also expands considerations about the reuse of packaging, formally dependent on the fact that the packaging is discarded as waste. Reuse of packaging is now considered as any means possible to ensure safe reuse before being discarded.

The trend in **political intents** is to **get out of packaging** assuming that the content is less impacting on the environment, which is scientifically flawed.

Regulatory provisions are aiming to reduce the relative mass of the container towards the content to such an extent that the services to society are threatened, leading eventually to an increase in the environmental impact of the whole packaging.

Removing packaging immediately exposes the content of the packaging to environmental pressures.

Not all materials are treated equally in the current legislative framework, leading to the belief that some materials have environmental impacts while others do not.

What is FOOD CONTACT MATERIAL?

Statement



Any product used to store, prepare, or deliver food exhibits material in contact with food. Food is a large concept, defined by the Food Law, covering any product along the value chain of food distribution and transformation intended to be eaten or drunk by humans or animals. **Food covers beverages, meats, fruits, vegetables, or dairy products.**

The legislator drafted laws to ensure the safe use and distribution of food, covering the food production and the material coming into contact with food, from farm to fork.

Services to society

Food contact material regulation (FCM) has one main objective: **ensuring that the food in contact with any material or product can be eaten safely by a human or an animal.**

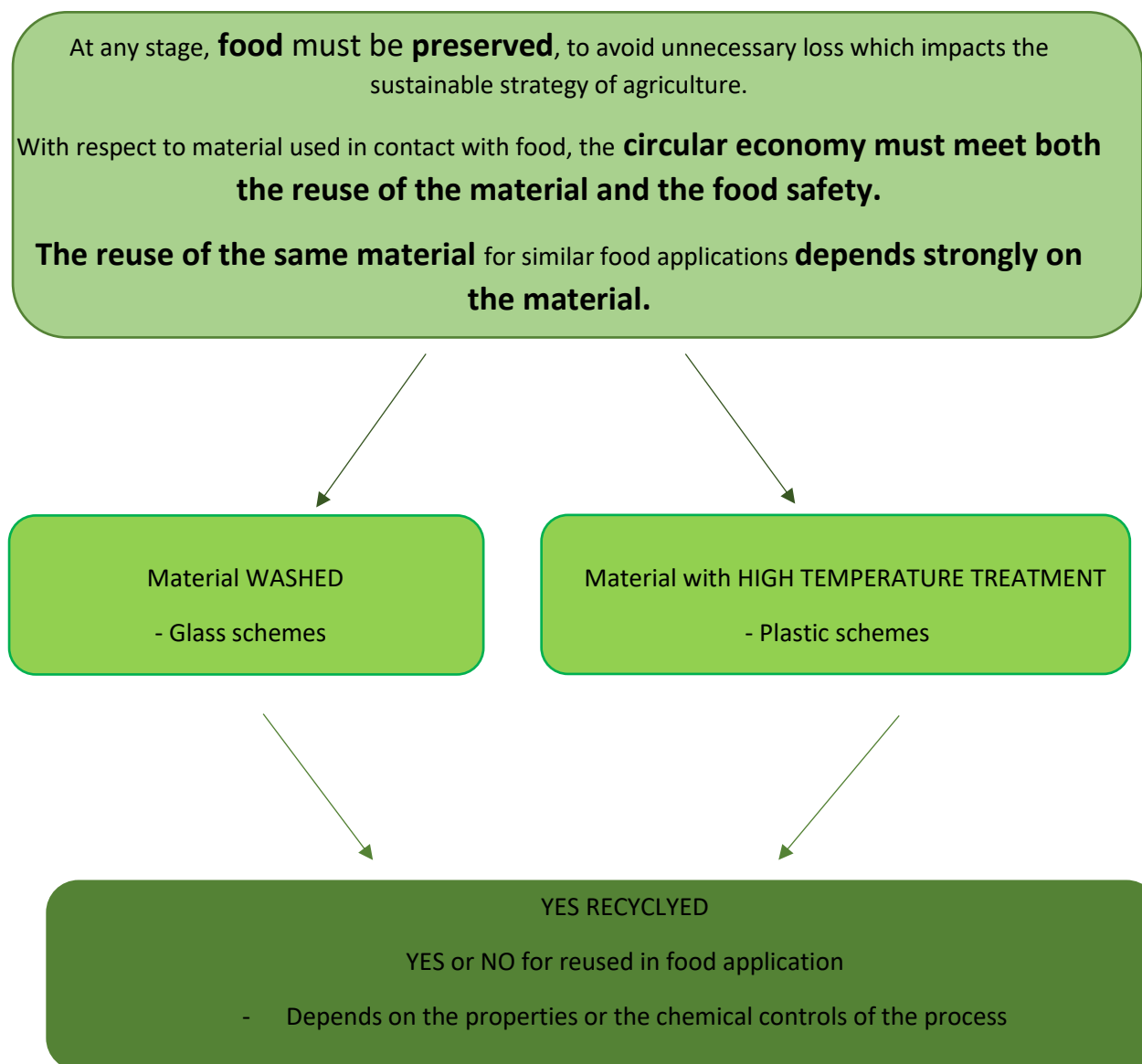
The purpose of the regulatory provisions and norms related to the **safe use of the material** is to assess, minimise, mitigate, or avoid any change to the food or beverage due to the material.

Food safety strategy is threefold:

- **Understanding** the characteristics of the food, including its natural alteration when exposed to air
- **Assessing** the material and understanding the interaction between the material and food in any stage before consumption, leading to assessing the hazard and risk of altering the food
- **Regulating.**

For a circular economy: legislation & concerns

One of the principles of the transition to circular economy is to **preserve** resource.



Any material in contact with food will interact with and may alter food or beverage. The strong apparent focus on plastic is the result of a regulatory delegation by the Member States to the European Commission and cannot undermine the science of food contact material, which is mainly regulated at the Member States level.

The development of the science of material and substance interaction with food is growing leading to new concerns which will eventually amend the ongoing current legislation.

The strong focus on unconfirmed risks and hazards in a material in contact with food leads to undermining the sustainable purpose of the use of safe food contact material.

Generalising the properties of material or substance outside their use, to deduce a risk is a simplification that leads to confusion and, in general, is counterproductive to the general interest.

In the next edition ...

- Safety for Food Contact Material
- Food Contact Material made of Plastics?

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