



# Legislative Suggestions for Food Contact Materials

EuPC-Food Contact Plastics Seminar 2018

**PlasticsEurope**  
Association of Plastics Manufacturers



## Content

**Brief Introduction on PlasticsEurope**

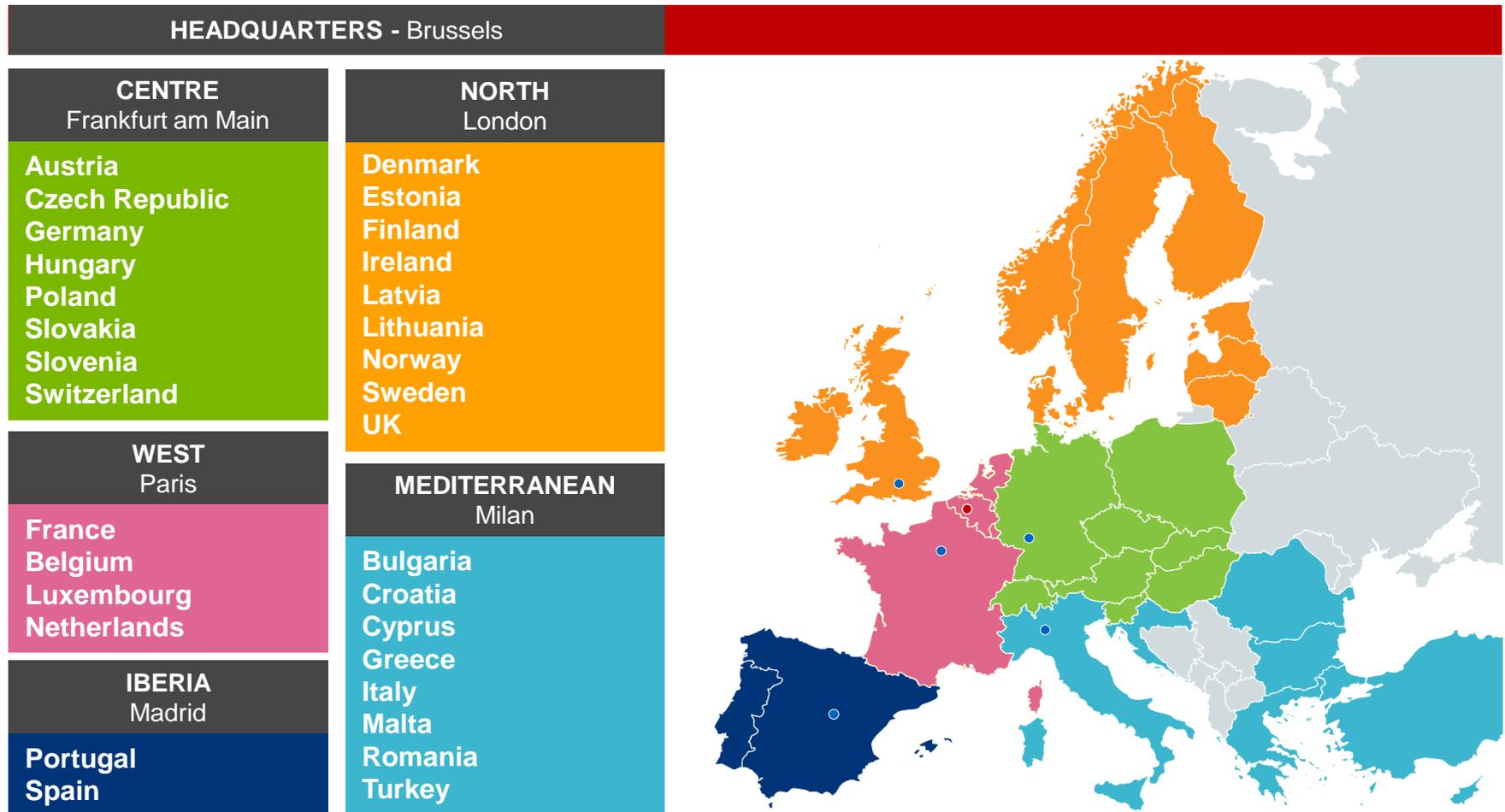
**Future Legislation: Brainstorming Summary**

**Next steps**

**PlasticsEurope**  
Association of Plastics Manufacturers

PlasticsEurope is a truly pan European organisation.

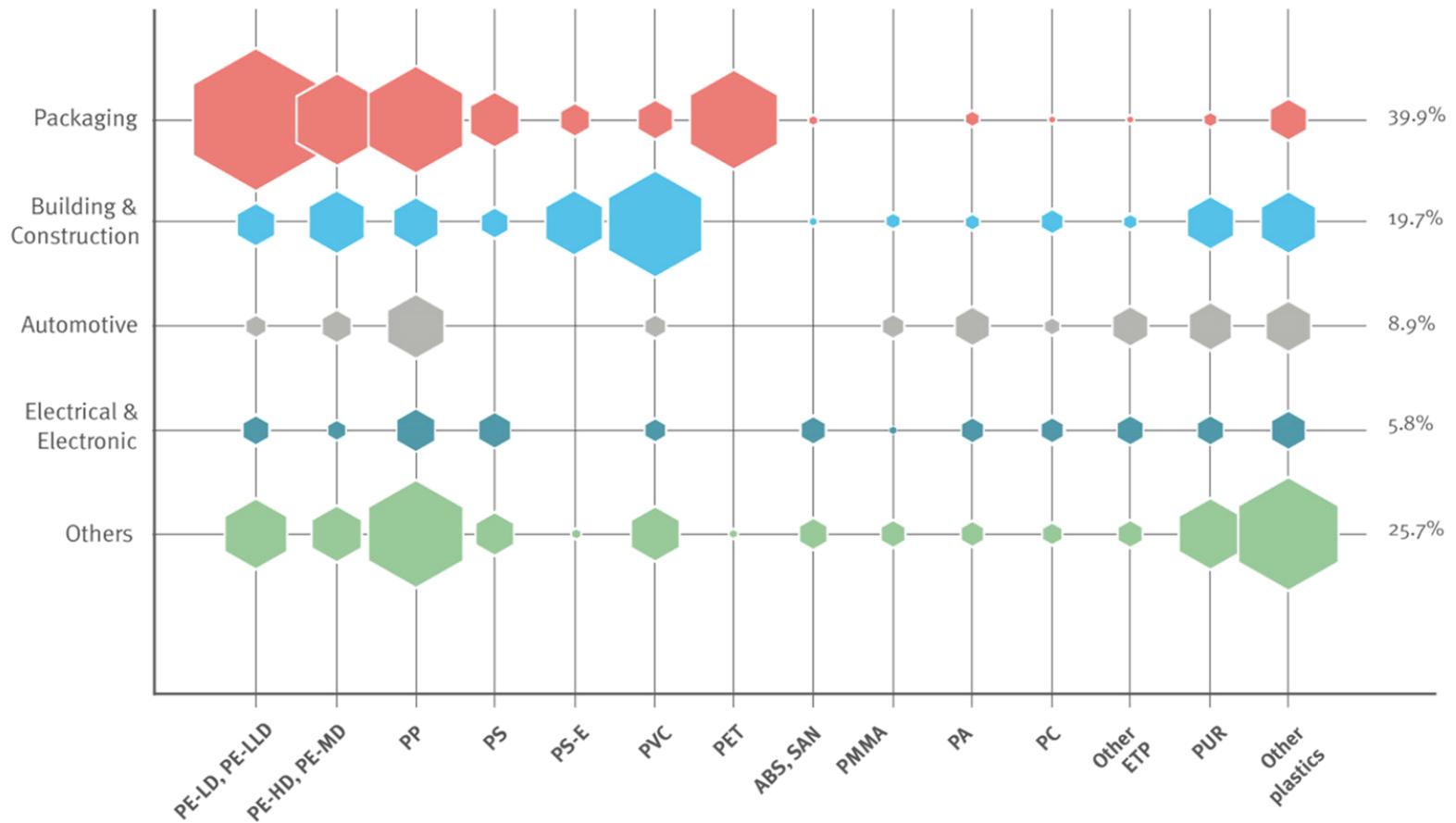
We represent plastics producers at EU, regional and national level.



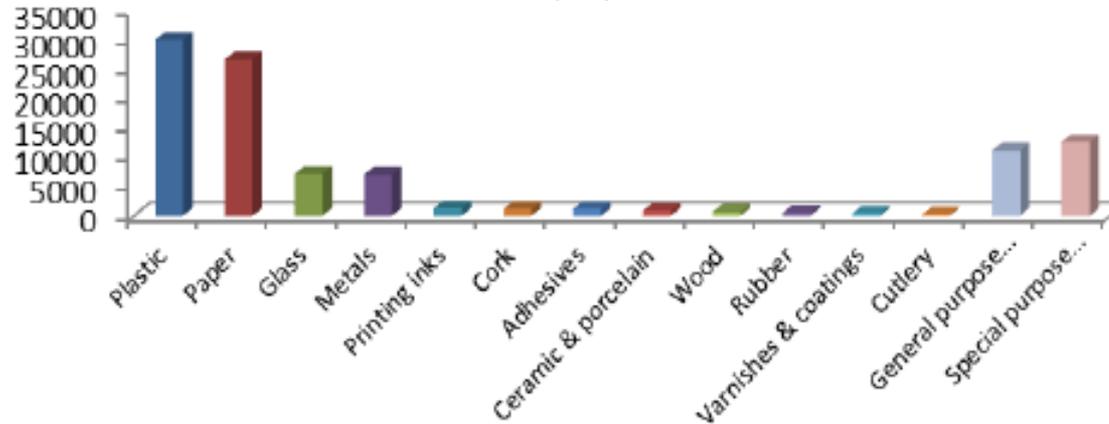
# Main markets for plastics

European plastics demand (EU-28+NO/CH) by polymer type 2015.

Source: PlasticsEurope (PEMRG) / Consultic / myCeppi



- Food Contact Materials: 100 bn €/y (Plastics n°1 & > 30%)



- Main functions of FCM
  - Protect food from contaminants and protect physical integrity
  - Contribute to decrease food waste and to reduce CO<sub>2</sub>
  - ...

**1. What are the difficulties & recommendations for improvements related to the current legislation?**



**2. Review existing/proposed scenarios and generate alternative idea's.**

**3. What suggestions to give to the Commission based on printed ink proposals?**

?

Together we will find the solution!

Enforceable

Workable

Simple



SAFE

- **Consensus on importance of INDUSTRY SELF ASSESSMENT**
  - Including Risk approaches / Compliance approaches
    - depending on the position within the value chain
  - NEED clear protocols & rules for Self assessment
    - defined by commission and EFSA (define protocols and rules)
- **FRAMEWORK basis to be reviewed**
  - Clarify and understand role and position
  - Use experience & learning from REACH
  - Create a bridge between FCM and REACH

\*Please note that the content of this presentation provides only a brief overview of the ideas developed during the brainstorming session. The content needs to be further analysed and developed

- **Strong supporter of the commission DATABASE**
  - Build and use the learning from REACH (include IUCLID information)
  - Use block chain approach
  - DATA ownership in the hands of those providing the data
    - Data introduced only by approved/recognized/trained/Accredited personnel
  - Cover ownership and offer opportunity to buy/access info
    - Opportunity to create consortia
  - Define strict rules, harmonized templates
    - One data set with clear requirements
  - Opportunity to have quick and fast data checks for compliances and if ok then green light to start commercialization under industry responsibility
    - To be followed by deep analysis via Member states or EFSA,...
    - Challenges address to EFSA in case of doubt

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- **Creation of identified/trained/recognized/qualified Experts**
  - Accredited/certified/recognized/qualified expert in Company (cosmetic approach)
  - Applicable for external consultants (for SME's) or MS experts,....
  - Trained and certified for DATABASE input data, compliance declarations, Self assessment,...
- **Improve COMMUNICATION/TRUST/TRANSPARENCY**
  - Improve communication and transparency but how to address while keeping CBI and old industry habits of being afraid to communicate
  - Need of information from higher up the supply chain to fine tune risk assessment
  - Need harmonization to ensure that end users receive information with the same “structure” and relevant information always being in the same place in the documents (type of SDS format)
  - should be equally applied for imported material
- **One FOOD Contact FOCAL POINT**
  - Based at the commission
  - In charge of Q&A, helpdesk → ensuring coherence

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CBI: Confidential Business Information



# Developing Guidance for repeated use articles

## Gordon Dawkins

EuPC-Food Contact Plastics Seminar 2018

- Introduction
  - Context & Applications
  - Associations concerned with Repeated Use Applications
- Guidance Document
- Decision tree
- Exposure tools:
  - worst case calculations/migration/migration modelling
- Evaluation of potential alternative exposure tools
- Overview of different exposure options
- Discussion
- Next steps

- The use of food in contact with plastics covers different areas:
  - Food Processing Industry: food processing machinery
  - Packing: food packaging
  - Use of food: kitchenware, including e.g. spoons, bakeware for oven applications, bowls adapted to micro-wave uses
  - Miscellaneous applications: camping equipment, vending machines
  
- Regulation (EC) No 10/2011 covers all usages of plastics in contact with food
  - Packaging
  - Repeated Use applications
  
- Other applications also often refer to food contact legislation
  - Toys, Medical, Cosmetics packaging and drinking water materials, for which food contact compliance is often requested

➤ Tools are required for risk assessment in other application areas than packaging

# Food Contact Repeated Use Applications

Resin Production



Virgin polymers grades



Master batches with different additives and pigments



- Thousands of processing factories across Europe
- Using hundreds of commodity and specialty grades
- Adding many different master batches
- To make a multitude of different finished articles
- Going into Kitchen and food Processing equipment and other food contact articles
- All requiring risk assessment to demonstrate consumer safety



# Food contact repeated use

## A vast range of Applications



- *Some equipment such as a coffee machine may have thousands of plastic parts on inventory that require risk assessment*
- *Many applications with very different use conditions*
- *Though most are indirect very short term contact*

*Input from immediate up- and downstream value chain partners*

Cefic FCA

EuPC

Plastics Europe  
Repeated Use Working Group

*Input from plastics producers and Consultants*

PlasticsEurope FCC Members

Crème/Cehtra  
Fabes/Systox  
MdcTec/AKTS  
Keller and Heckman  
Olivier Vitrac

*Discussions with downstream value chain Associations*



ILSI

CECED

Food & Drink

ZVEI

ProK

## FOOD CONTACT REPEATED USE APPLICATIONS Guidance REV 2

**Proposals for exposure assessments for plastic intermediate materials and articles in the frame of article 19 of Plastic Regulation (EU) No 10/2011<sup>1</sup>**

**The Main focus of this work, though not exclusively, is on NIAS & NLS risk assessment in repeated use application\***

- NIAS: Non Intentionally Added Substances, NLS: Non Listed Substances

For single use application please refer to:

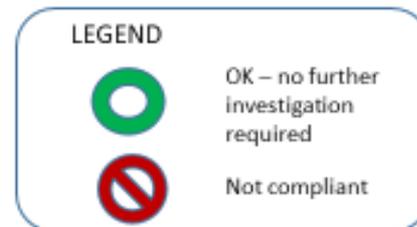
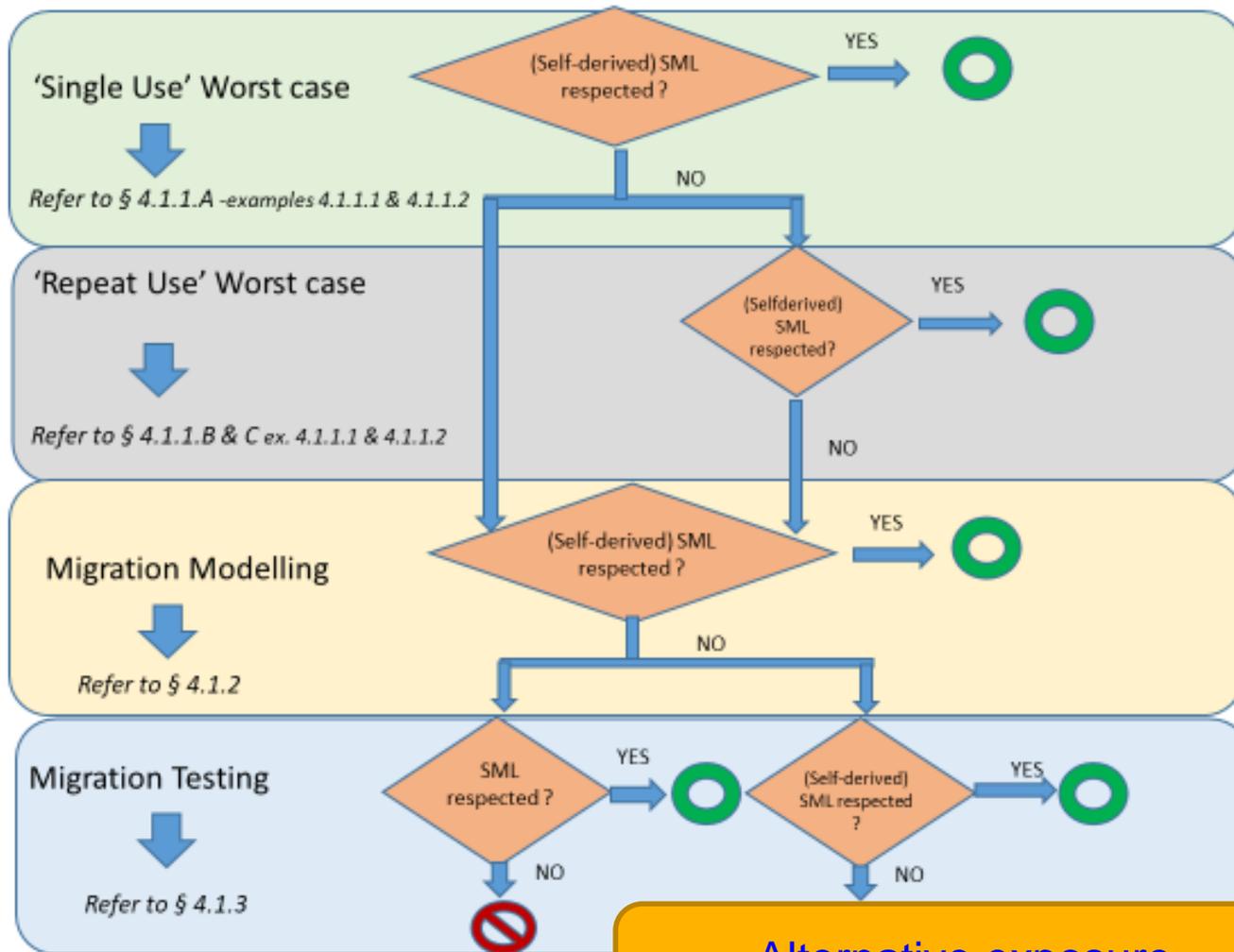
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# Food Contact Repeated Use Applications Decision Tree

## Tiered Approach for Exposure Assessment of Migrants



Alternative exposure approaches

Methodolgy	Advantages	Disadvantages
Worst case calculations	Provides clear result Simple fast	Most conservative
Migration testing, following EU guidance	Provides clear result	<ul style="list-style-type: none"> <li>• Requires technical work</li> <li>• Can be conservative</li> <li>• Does not consider life time exposure</li> </ul>
Modelling	Fast and cost effective	<ul style="list-style-type: none"> <li>• Requires modelling parameters</li> <li>• Data available for a few plastics</li> <li>• still conservative</li> <li>• limited use so far for repeated use</li> </ul>
FDA Approach	Provides clear result Pragmatic approach Used over a long period in a large jurisdiction	<ul style="list-style-type: none"> <li>• Simplistic for certain exposure scenarios</li> </ul>
Rubber approach inspired by Warenwet	Fast and simple	<ul style="list-style-type: none"> <li>• Simplistic for certain exposure scenarios</li> </ul>
Matrix inspired approach	Interest for NIAS Concept of level of interest	<ul style="list-style-type: none"> <li>• Requires detailed information of market and applications</li> </ul>
Probabilistic modelling (Inspired by FACET)	Interest for NIAS  The most sophisticated approach to address examples that cannot be solved with simpler methods	<ul style="list-style-type: none"> <li>• Requires a lot of detailed information on market and applications along with modelling parameter assumptions or data</li> </ul>

# Probabilistic Modelling applied to Repeated Use Applications

Co-exposure



Market prevalence →

- Material preferences
- Domestic
- Industrial

- Composition  
polymers  
additives  
concentrations
- Article design  
sizes  
shapes  
Non-plastics

habits and practices →

- Target population  
nationality  
age  
gender

- Eating habits  
in home or out  
food preferences  
quantities  
times  
temperatures

Very complex - start simple

This is inspired by the Facet work for Packaging

- Provide guidance on best practice to members and downstream users
- Develop new improved methodologies
- Advocate for practical risk assessment options
  - Downstream
  - Authorities
    - Raise awareness of issues
    - develop dialogue
    - Explore options
    - Interest/acceptance to consider exposure options
    - Push for simple enforceable solutions



# Plastics

The Material for the 21st Century

**We thank you for your attention**