



# Food Contact Materials

## POSITION PAPER

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### Food packaging plays an active role in reducing food waste

From plastic foils to canned goods, paper and the multilayer cartons of beverages, food and drink packaging keeps our food safe and nutritious. Packaging protects our food from air, light, dirt, pathogenic microorganisms, and other elements to prevent undesirable changes to the food's safety, nutrient composition, and quality.

### Food packaging is vital for the transition towards more sustainable food systems

The food and drink industry is reducing packaging waste by investing in innovative solutions and new materials; improving packaging recyclability; and increasing the use of recycled materials. True packaging circularity will mean ensuring packaging functionality and food safety, without trade-offs in food loss and waste prevention, all while maintaining food contact material safety.

### ESSENTIALS FOR FUTURE FOOD CONTACT MATERIAL LEGISLATION

- Enhances the trust in the safety of food packaging by ensuring high consumer protection
- Maintains existing risk assessment approach for substances used in food packaging
- Designed to promote recyclability and circularity across all packaging materials
- Encourages innovation of new packaging materials

All food packaging should **support** the EU Green Deal.

**10 million** tonnes of recycled and food safe plastic materials into new products by 2025.

**41%** of plastic packaging waste was recycled in the EU in 2019.

## The European Commission should enable sustainability and safe materials for food packaging by:

### 1 Harmonising rules for all Food Contact Materials

The EU Food Contact Materials regulatory framework needs to be revised to guarantee effective functioning of the European single market and promote sustainability and innovation. An approach to achieve harmonisation should be divided into three distinct regulations:

- Food Contact Substances
- Final Articles and Migration Testing
- Recycled Food Contact Materials

These three distinct regulations should then fall under the umbrella of the current Regulation 1935/2004 and the overarching principles of the Good Manufacturing Practices Regulation 2023/2006.

Additionally, effective harmonisation will require:

- Specific provisions on exchange of essential information to enable more transparency within the supply chain.
- An assessment of consumer exposure to any starting substance material used in food packaging as a pre-requisite for authorisation.
- Urgent regulation of other non-plastic recycled food contact materials, e.g., recycled paper and board. Thus, avoiding further fragmentation of the internal market due to differing national measures.

### 2 Provide guidance to industry on recycled plastics

The food and drink industry needs a sufficient, reliable, and consistent supply of high-quality and safe recycled plastic materials for food contact applications. The new regulation on recycled plastics has brought improvements to innovation and extending its scope beyond mechanical recycling. But the European Commission must now clarify to all stakeholders in the recycling value chain the legal status of novel technologies, additional requirements for recyclers transforming waste into virgin-grade substances and the connection to other regulation dealing with recycling (e.g., claims).

### 3 Collaborating European agencies for effective measures

We support all efforts to increase efficiency between agencies conducting risk assessment. In particular the European Commission should align initiatives and remove duplication or contradiction between regulations.

For food contact materials, the exposure assessments (e.g. oral ingestion), must be an integral part of the risk assessment and should not only focus on the hazards of substances.

### 4 Equal levels of consumer protection

In order to ensure legal certainty, enable free movement of goods, and have a level playing field within a harmonised market, the regulations relating to food contact materials must apply equally to all economic actors within the supply chain, regardless of size. This way, the consumer can trust that safety of food packaging is guaranteed, and without overcrowded labels and packaging with too much detailed information.

#### ABOUT FOODDRINKEUROPE

FoodDrinkEurope represents Europe's food and drink industry, one of Europe's largest manufacturing sectors in terms of turnover, employment and value added.

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