

February 2021, Brussels

## **CORRIGENDUM to the FOOD CONTACT GUIDELINES FOR THE COMPLIANCE OF PAPER & BOARD MATERIALS AND ARTICLES introducing amendments as at February 2021.**

The following amendments to the Food Contact Guidelines have been adopted by the Paper and Board Sector (paper manufacturers, converting sectors and tissue industry).

This Corrigendum is an integral part of the Guidelines. The amendments are listed below and are in *italic*:

1. Consequence of the revision of the German BfR Recommendation XXXVI – 1<sup>st</sup> June 2019
  - TABLE 1: TESTING RECOMMENDATIONS FOR KNOWN NIAS
    - i. Page 19. A new row is inserted in the table for Aluminium:  
Column Substance: *“Aluminium (Al)”*  
Column SML: *“must not exceed 1 mg/kg in food”*  
Column Food type: *“Testing is not necessary for paper and paperboard intended for contact with dry and at the same time non-fatty foodstuffs”*.  
Column Method: EN 645 - *“If tested in cold water extract, a limit of 2 mg/l applies to aluminium until 31.12.2020. A limit of 1 mg/l applies to aluminium afterwards”*.
    - ii. Page 21. Row Bisphenol A (BPA) column SML: *“Max. 0.05 mg/kg”* in correspondence with DE: BFRXXXVVI
2. To provide a clearer interpretation of the Guiding rules on Declaration of Compliance by rewording some of the relevant clauses
  - Chapter 7.1 second sentence (page 36) should read (*changes are in italic*): *“The Declaration of Compliance is the main tool for supply chain communication and is compulsory for all business operators, where a specific measure exists. Although not strictly legally required until a specific measure is in place, the paper and board manufacturing chain agrees that it is the most appropriate tool for communication in the supply chain and it is a de facto obligation.”*
  - Chapter 1.4.7: (page 12): The Framework Regulation requires that food contact materials and articles which are subject to a specific measure must be accompanied by a written declaration stating that they comply with the rules which apply to them. *In the case of paper and board a specific measure does not exist currently. Although not strictly legally required until a specific measure is in place, the paper and board manufacturing chain agrees that it is the most appropriate tool for communication in the supply chain and represents current de facto obligation. It must be taken into account that some national legislation may require the issuing of a Declaration of Compliance. In those cases, the Declaration of Compliance has to be issued according to the legal provisions of each MS.*
3. To correct two typos on internal references
  - Table 1, Page 19. Row “Cadmium” column “Method”: the reference to “EN 12498<sup>30</sup>” should be *“EN 12498<sup>31</sup>”*
  - Page 22, Chapter « 3.4.2 Testing Recommendations for Converted Paper and Board Materials and Articles » the last row “as outlined in Section 3.2 on MMML” should be “as outlined in Section 3.3 on MMML”.