

# Paper and Board in Food Contact Applications



## Legislative Background

Regulation (EC) 1935/2004 sets the benchmark for packaging materials in food contact applications. SI 2005 No. 898 provides for the enforcement of the Regulation in England and came into force on 29 April 2005. It should be noted that the obligation is on the packer/filler.

The Regulation concerns the placing on the market of materials and articles intended to come into direct or indirect contact with food and applies to materials and articles which:

- are intended to be brought into contact with food, or
- are already in contact with food, or
- can reasonably be expected to be brought into contact with food or to transfer their constituents to food under normal conditions of use.

Article 3 of the Regulation requires that:

“Materials and articles... shall be manufactured in compliance with good manufacturing practice so that, under normal or foreseeable conditions of use, they do not transfer their constituents to food in quantities which could:

- endanger human health, or
- bring about an unacceptable change in the composition of the food, or
- bring about a deterioration in its organoleptic characteristics”.

*(Note: organoleptics essentially refers to its taste and smell, or taint and odour)*

While the Regulation sets the benchmark, it may be noted that – while some national provisions exist – there is no specific legislation at EU level for paper and board in food contact applications.

The European Paper and Board Industry has therefore decided to publish its own *Good Manufacturing Practice for the Manufacture of Paper and Board for Food Contact*

*and Industry Guideline for the Compliance of Paper & Board Materials and Articles for Food Contact* ([https://thecpi.org.uk/library/PDF/Public/Publications/Guidance%20Documents/09-Good%20Manufacturing%20Practice%20\(GMP\).pdf](https://thecpi.org.uk/library/PDF/Public/Publications/Guidance%20Documents/09-Good%20Manufacturing%20Practice%20(GMP).pdf)).

## Conformance with Requirements

Manufacturers of paper packaging employ good manufacturing practices and only use materials which do not endanger health. To this extent, they meet the requirements of all the applicable Regulations.

The requirement that the organoleptic characteristics of the food being packed are unaffected by its packaging is more difficult to assess. The paper packaging manufacturer is not normally in a position to assess the interactions which may occur, given the diversity of food packed in similar containers and the complexity of the interactions, particularly relating to taint and odour.

Thus, while the manufacturer will be in a position to give assurances on the absence of constituents endangering health, the users of the packaging (principally the packer/filler) should satisfy themselves on the ultimate suitability of the packaging for the food being packed.

## CPI Position:

- Paper and Board has a long and successful history of safe use in the food industry in a wide range of applications. These include applications where intimate contact is involved, such as tea bags and baking papers, and direct contact packaging such as sugar bags and cartons for dry foods. It also has a range of uses in transport packaging;
- The Paper and Board sector has a long-standing commitment to the protection of human health and the interests of consumers through the provision of safe and functionally effective materials;

- The sector has co-operated over a long period of time with government, both at national and European level, and with other regulators to ensure necessary levels of consumer protection;
- CPI supports the *Industry Guideline for the Compliance of Paper & Board Materials and Articles for Food Contact*, which provides a methodology for establishing the suitability of Paper and Board for specific food contact applications. It is envisaged that this Guideline could form the basis of an EU specific legislative measure in the future.

### Further Information

Further information is available from Andy Barnetson, Director of Packaging Affairs, on 01793 889602 or email [abarnetson@paper.org.uk](mailto:abarnetson@paper.org.uk).

### Confederation of Paper Industries

- The Confederation of Paper Industries (CPI) is the leading trade association representing the UK's Paper-based Industries, comprising paper and board manufacturers and converters, corrugated packaging producers, makers of soft tissue papers and collectors of paper for recycling.
- CPI represents an industry with an aggregate annual turnover of £12 billion, 62,000 employees, which supports a further 100,000 jobs in the wider economy.
- For facts on the UK's Paper-based Industries please visit: [www.paper.org.uk](http://www.paper.org.uk).

REVISED: JUNE 2020