

## FOOD CONTACT GUIDELINES FOR THE COMPLIANCE OF PAPER & BOARD: SUMMARY OF CONTENT

This summary provides users with a short introduction to the *Food Contact Guidelines for the Compliance of Paper & Board Materials and Articles* ('the Guidelines'). It provides some key points for ease of reference; however, we strongly recommend that you refer to the content within the main Guidelines for the detail. The Guidelines will be useful for all operators in the supply chain for paper and board food contact materials. Some areas, such as recycled materials or the 'Declaration of Compliance' (DoC) will only be applicable at certain stages within the supply chain, whereas others such as traceability and testing requirements will apply to most operators.

There are currently no specific measures governing the use of paper and board in food contact uses. UK food contact materials (FCM) legislation encompasses the requirements set at European level for all FCM, namely the Framework Regulation 1935/2004 and Good Manufacturing Practice Regulation 2023/2006. All materials that could normally come into contact with food or drink must not be dangerous to health, change food or drink in a detrimental way, or reduce the product's desirability.

Voluntary Guidelines have been developed for manufacturers and suppliers of food contact paper and board, in the absence of specific legislation. These will help achieve a high standard of finished product that will comply with the overall FCM legislation. The full Guidelines can be accessed at <http://www.cepi.org/fcg>

The Guidelines have been formulated by many leading organisations in the paper and board industry, covering a range of materials including:

- coated paper and board
- multi-material multi-layers (MMMLs)
- converted packaging
- secondary and tertiary packaging and tissue paper

Details of these areas can be found in various sections of the report, with page references to guide users to the relevant information.

A visual summary of the scope of the guidelines can be found at the end of this short summary. Guidance is also provided relating to the use of inks, adhesives and other additives used in the industry (pages 9, 10, 22, 26)

The report is split into sections, with comprehensive detail in each on the requirements placed on business operators. A summary of some of the key sections can be found below:

- **Compliance requirements** (Section 1.4, pages 7-12)
  - Regulations 1935/2004 and 2023/2006 (page 8).
  - Risk management
    - Internal risk management recommendations in relation to achieving Good Manufacturing Practice are summarized on page 8.
    - Sector-specific recommendations can be found throughout the Guidelines
  - Selection of raw materials and substances that are added to paper and board (pages 8-9).

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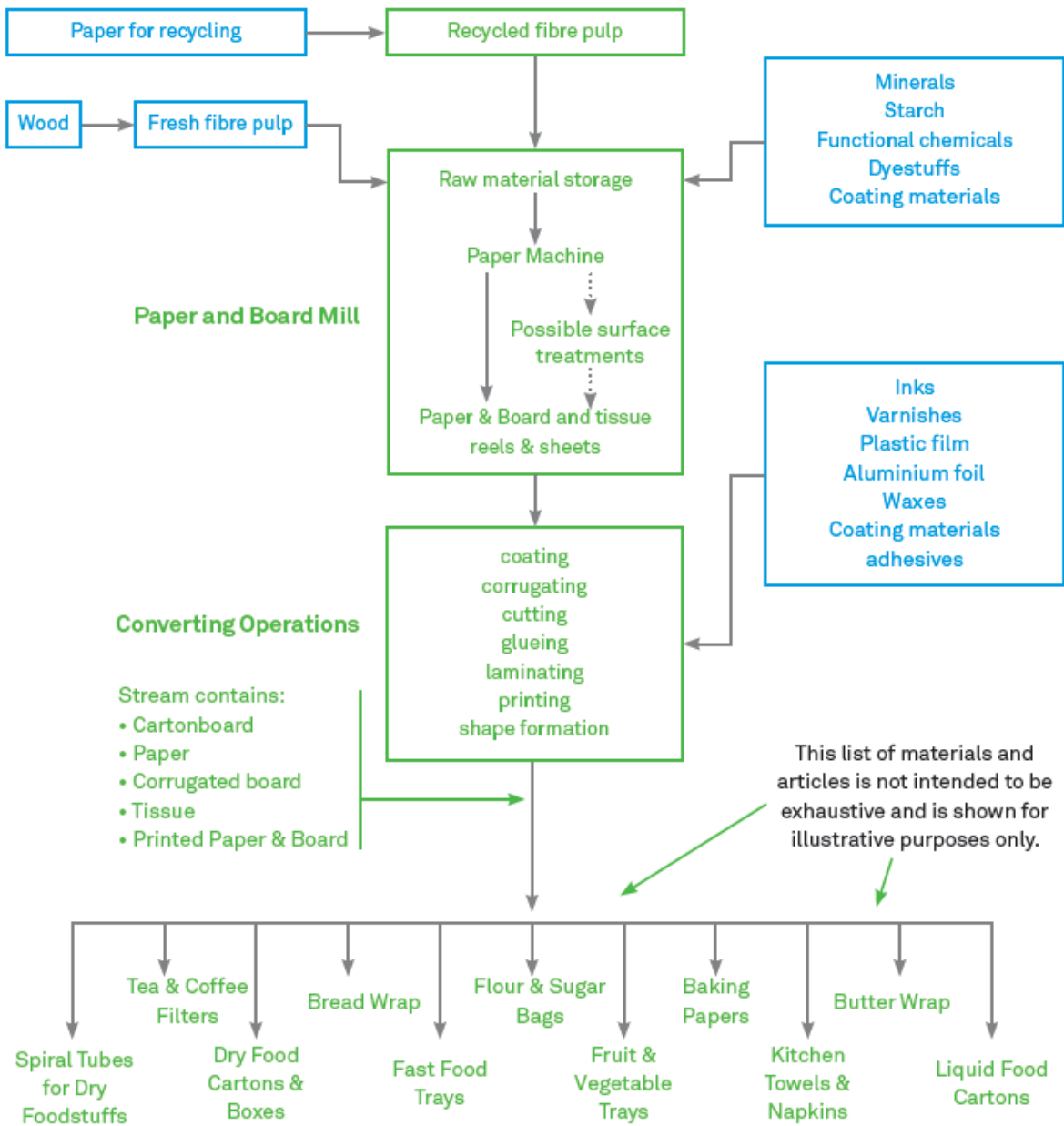
- Considerations for Non-Intentionally Added Substances (NIAS) (pages 10-11).
- **Recommended compliance testing, methods and frequency** (Section 3, p. 16-24)
  - Uncoated paper and board FCM do not come into contact with liquid food, so liquid simulants are less relevant than with other FCM such as plastics.
  - MMMLs are required to comply with the Framework Regulation and the GMP Regulation.
  - If plastic is present in a MMML, the plastic must also comply with the relevant requirements of Regulation 10/2011 as amended. A DoC listing all components of a MMML is required. This Regulation (10/2011) does not apply to the non-plastic layers in such materials.
  - Modified Polyphenylene Oxide (MPPO) can be used to simulate contact with liquid food (page 17).
  - Frequency is based upon a risk assessment, and potentially such factors as customer requirements.
  - Recommendations for testing a wide variety of paper and board applications (pages 17-18).
  - Information is included on testing for NIAS commonly found in paper and board FCM.
- **Additional requirements for ensuring the safety of recycled paper and board FCM** (Section 4, pages 26-27)
  - Considerations to ensure a suitable grade of input material including source of the paper, recycling technology and intended use of final product.
  - Further detailed guidance is available in CEPI GMP documents. References are provided in these Guidelines (page 26 & 52-53).
  - Knowledge of substances that could have been added to the original material
    - The recycling stream can contain numerous additives and contaminants that might have an impact on the safety of the recycled paper.
  - Reference to further sources of information specific to recycled paper and board.
- **Traceability guidelines** (Section 5 pages 30-32)
  - Outline of requirements of Regulation 1935/2004
    - Article 17 states that systems, procedures and documentation must be in place to ensure that a food contact material and its components and constituents can be traced to their manufacturer.
  - Example methods of ensuring traceability in the paper and board supply chain for different types of product.
  - Recommendations for product recall
    - The Food Standards Agency and Food Standards Scotland, along with local authorities, are responsible for the withdrawal and recall of defective products in cases where articles fail to comply with FCM legislation. These Guidelines recommend ISO 9001 on quality management principles for further detail on withdrawal procedures that can be implemented by operators.

- **Labelling guidelines** (Section 6, page 34)
  - Outline of requirements of Regulation 1935/2004.
  - Examples of best practice.
  
- **Supply chain communication** (Section 7, page 36)
  - Highly important in reducing the risk from NIAS.
  - Information to be exchanged between business operators.
  - Information to be provided to end users.
  
- **'Declaration of Compliance'** (Section 8, pages 38-41)
  - Under Regulation 1935/2004, a 'Declaration of Compliance' is only required for FCM with specific legislation, e.g. plastics, regenerated cellulose film.
  - However, the Guidelines require a 'Declaration of Compliance' to improve best practice and ensure that the necessary information is communicated up and down the supply chain.
  - A list is provided of the required information in the Declaration (pages 39-41).
  - A list is provided of the supporting information required to be supplied with the Declaration (page 38).

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**Annex I: Graphical representation of area covered by the scope of the Guideline**



Green = included in scope

Blue = the use of these materials in paper and board is within the scope of this Guideline but their manufacture is not and is mostly covered by national legislation and/or industry recommendations/best practice.