Joint feedback to the European Commission Roadmap on the "Farm to Fork Strategy"

The undersigned associations welcome the roadmap on the Farm to Fork Strategy and support the transition to a sustainable food system which contributes to climate neutrality and the circular economy. The ambition to stimulate sustainable food production and to reduce food waste is an important step in the implementation of the UN Sustainable Development goals.

In this perspective, food contact materials and articles are an essential part in the food supply chain, play a key role to ensure consumers safety and for overall sustainability of the food system:

- Food packaging maintains the quality of the packaged food and is the means to providing information to consumers on content, origin, nutritional values and thus supports the EU efforts to promote sustainable consumption.
- Food packaging prevents food waste and contributes to sustainability by protecting products during transit and storage and by extending the usable life of products on the shelf, as recognised by the European Parliament report on resource efficiency "Reducing food waste, improving food safety" published in 2017. The same report also stresses that "*innovative and environmentally friendly solutions in areas such as the management of co- and by-products of food production, food trade, food storage, shelf-life, digital technologies, and food contact materials, can offer significant potential for food waste reduction*".
- The loss or damage of food has a higher environmental impact compared to the packaging itself in terms of resources used and the emissions created. In a future where the natural resources are scarce, their efficient use and fit for purpose packaging will be essential to a sustainable food system.
- A level playing field for all food contact materials is a pre-requisite for the functioning of the internal market. The free movement of goods in the single market ensures a flow of food contact materials and articles, and packaged food itself. This requires further harmonisation of the EU legislation on food contact materials and articles to reduce barriers to trade and improve the competitiveness of European companies.
- All food contact materials and articles are covered by the Framework Regulation 1935/2004, which is currently under review by the European Commission. In order to reach compliance with the obligations of the Regulation and ensure consumer safety, they must be manufactured in accordance with Good Manufacturing Practices (GMP) and provide for traceability at all stages of production. Furthermore, it is good practice to exchange adequate information along the supply chain in order to enable the next actor in the chain to demonstrate compliance. In these complex value chains, many industrial sectors are involved: the producers of raw materials, ink manufacturers, adhesive manufacturers, packaging converters, printers and food business operators. Currently, EU specific measures exist only for a limited number of materials, for example on plastic, ceramics and recycled plastic.

A re-thinking of the policy approach is needed with strong alignment between the Farm to Fork Strategy, the new Circular Economy Action Plan and the EU Industrial Strategy.

We call on the Commission to integrate the EU harmonised approach towards food contact materials in the Farm to Fork Strategy and ensure its timely development. Risk-based harmonised EU legislation on food contact materials and articles will enhance the policy coherence in the EU and provide the necessary tools to ensure the maximum level of consumers' protection and food safety.

Signatory associations:

ACE - The Alliance for Beverage Cartons and the Environment
CEPI - Confederation of European Paper Industries
CITPA - International Confederation of Paper and Board Converters
ECMA - European Carton Makers Association
EuPC - European Plastics Converters Confederation
EuPIA- a sector of CEPE: European Printing Ink Association
FEFCO - European Federation of Corrugated Board Manufacturers
FEICA - Association of the European Adhesive & Sealant Industry
FPE - Flexible Packaging Europe
IK – German Association for Plastic Packaging and Films
Intergraf - European Federation for Print and Digital Communication
I&P Europe - Imaging and Printing Association
MPE - Metal Packaging Europe