

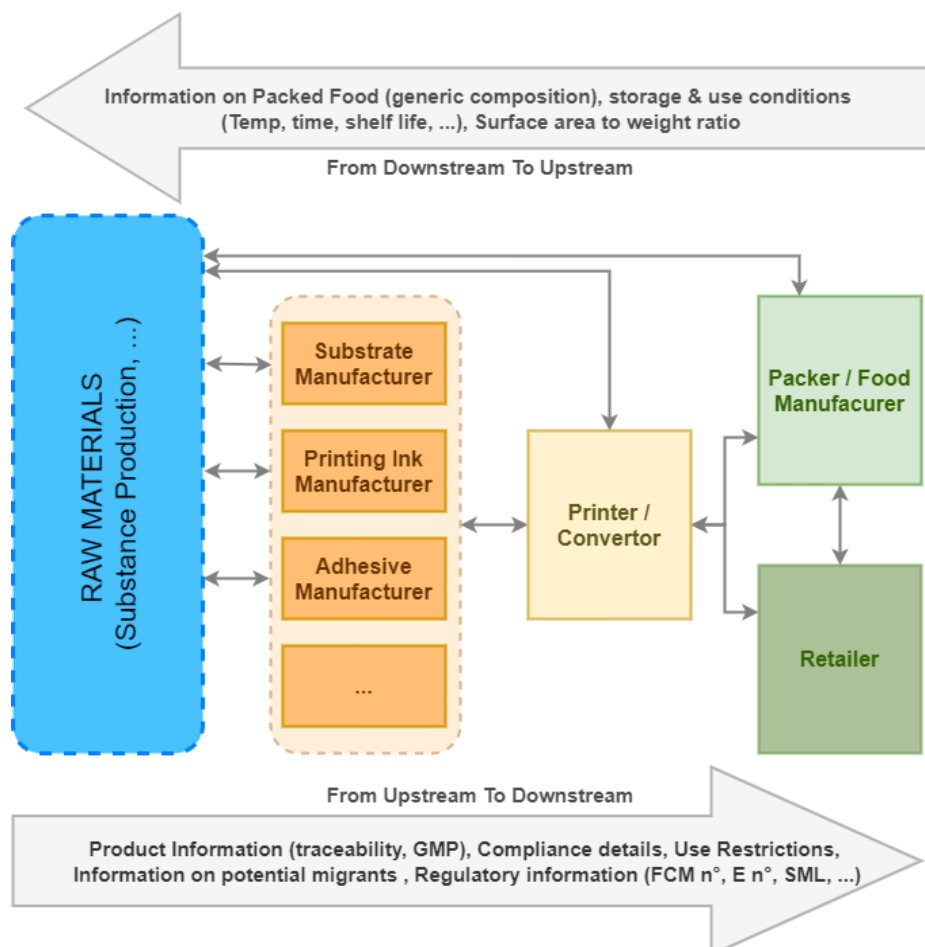
PIJITF Guidance on Information Flow and Transparency in the Printed Food Packaging Supply Chain

Introduction

This is a guidance document for PIJITF members. In order for the final pFCM to be compliant with the relevant legislation, each actor in the supply chain needs to share data relevant to the compliance work and exchange information to allow further risk assessment and risk management. The goal is to give guidance to companies in the printed food packaging value chain on what consists adequate information for further risk assessment and risk management.

This guideline is not meant as a form to be filled out nor a questionnaire to be send to customers or suppliers. It merely serves as a guide on what can be communicated along the supply chain and could constitute as the necessary information to conduct a proper risk and compliance assessment. Industry recognises that information is needed throughout the supply chain among actors, both downstream and upstream. The guidance focuses on the information needed and does not define the means of communication or replace business to business agreements, such as NDAs.

The following diagram is to help illustrate the flow of information amongst operators in the packaging ink supply chain.



Information flow from Downstream to Upstream

Upstream information flow contains information on packed food, storage and use conditions, surface area to weight ratio. An example would be the information on food stuffs packing conditions from the food manufacturer to the convertor.

Details are given in the table below. The first column provides the subject of information. The options available as a subject for upstream information flow are :

- Identification of food: general composition of the food that will be packed
- Identification of Substance: dual use substances (i.e. dual use additives which may be present in the food and the packaging, such as food additives)
- Packed Food Conditions: information during packing, in storage and use instructions
- Packaging design & construction: specific packaging information (e.g. Functional barrier)

The second and third column provide the type of information and additional details.

table 1 Information flow Downstream to Upstream

Subject	Information	Identification of details
Identification of food	Food identity/type	
	Food category	According to regulation (EU) No 10/2011 (if applicable)
	Generic food composition	% fat, % water, pH
	--> alternatively provide information for selection of appropriate food simulant(s)"	
	Infant food	(yes/no)
Identification of Substance	Dual Use substances	E-No Food additives, Flavis No Flavourings, Process Aids (Identification + Quantities)
Packed Food Conditions	Conditions during packing	Temperature, pressure, time,
	Post-packing conditions	Sterilisation conditions (temp, time, pressure, irradiation)
	In-pack storage conditions (shelf-life)	Time, Temp
	In-pack cooking conditions	Instructions of use for consumers

Packaging design & construction	Intended surface area to weight ratio	
	Packaging design	Internal & external packaging layers e.g. flow wrap, tray in carton
	Packaging materials	Type of material(s) used
	Presence of functional barrier	Material, thickness, location in packaging
	Surface in contact with food	Which part of the packaging is in contact with the foodstuff? Is the printed and/or varnished surface intended to contact food?
Internal Use	Country of Commercialisation	

Information flow from Upstream to Downstream

Downstream information flow contains the product information (for GMP traceability reasons), compliance details, use restrictions, Information on substances of relevance for the FCM risk assessment and regulatory information. Examples would be the information on relevant conditions of use (e. g. room temperature) from a converter to the food manufacturer or information on potentially migrating substances from an ink manufacturer to a converter.

Details are given in the table below. The options available as subject for downstream information flow are:

- Identification of item: information about the product in question, e. g. substance, mixture (ink raw material or ink), final FCM (printed packaging), ...
- Substances used or known to be present in the product of relevance for the FCM risk assessment
- Substance identification: substance specific information
- Quantity: of the substance in question
- Substance regulatory information: EU, national and third country legislative sources
- Compliance information: status of the risk assessment and compliance work, instructions on use and limitations
- Miscellaneous/general: any additional information that is needed

The second and third column provide the type of information and additional details.

table 2 Information flow from Upstream to Downstream

Subject	Information	Identification of details
Identification of item	Trade name & description	Refers to the tradename of the product sold downstream
	Product code / reference number	
	Batch number / manufacturing reference	
Substances used or known to be present in the product of relevance for the FCM risk assessment	added components	
	impurities	
	any stabilisers, process solvents, catalysts or process aids if present at end	
	residual monomers	
	NIAS	
	Potential decomposition or transformation products	
	direct food additives	E number
	food flavourings	Flavis number
Substance identification	chemical name	
	CAS number	if no CAS number, provide alternative such as EC number, or CAS numbers of component monomers for a polymer
	partial information if identity not known precisely	e.g. indication of chemical nature such as aliphatic ester
Quantity	(actual) % by weight or PPM	
	maximum amount	
	typical amount	e.g. for NIAS, variable composition
	thickness or quantity of the ingredients in each of the components/layers	actual, maximum or typical (specify)

Substance regulatory information	FCM No (Plastics)	
	Reference No	other lists e.g. Swiss Ordinance
	E number (food additives)	
	Flavis No (food flavourings)	
	SML (official)	indicate source
	SML (self-derived)	Self derived methodology available on request
	Relevant restrictions	
Compliance information	confirmation of compliance	
	method of compliance assessment	worst case calculation, modelling, testing,... further details available on request
	which parts of compliance assessment have been delegated to the customer / require checking	e.g. conversion from a default scenario to actual dimensions, conditions, etc; testing to ensure compliance with migration limits
	surface to weight ratio	actual or assumed in the compliance assessment
	relevant conditions of use information	instructions on use, limitations, time & temperature conditions. food type, barriers, etc
Miscellaneous / general	Information on heavy metal content	
	Information on substances of regulatory concern	for example: GMO, SVHC, food allergens, CMRs, biocides, flame retardants, Bisphenols, ED's, PFAS, etc...

Disclaimer

This guideline is meant to support PIJITF members in the communication flow as part of the value chain. It does not replace the risk assessment or the existing business communication agreements, such as NDAs. Any missing information should be shared with the PIJITF for future revisions and improvements. The guideline does not relieve any actor of the value chain from the duty to ask for additional information needed for the specific risk assessment or disclose additional information that may be relevant.

Clearly not every piece of information given above is needed or relevant for each application. Standard applications may need less information flow than special or sensitive cases. Hence, each actor needs to decide on a case-by-case basis. However, in especially in case of new products a more detailed information should be exchanged as part of the management of change process.

December 2022

List of PIJITF members:

ACE – The Alliance for Beverage Cartons and the Environment, www.ace.be
CEPI – Confederation of European Paper Industries, www.cepi.org
CITPA – International Confederation of Paper and Board Converters, www.citpa-europe.org
ECMA – European Carton Makers Association, www.ecma.org
ESIG/ Cefic European Solvents Industry Group, www.esig.org
EuPC – European Plastics Converters Confederation, www.eupc.org
EuPIA – a sector of CEPE: European Printing Ink Association, www.eupia.org
FCA / Cefic, Food Contact Additives, <http://fca.cefic.org/>
FEFCO AISBL – European Federation of Corrugated Board Manufacturers, www.fefco.org
FEICA – Association of the European Adhesive & Sealant Industry, <http://www.feica.com>
FoodDrinkEurope: Confederation of the food and drink industries of the EU –
www.fooddrink europe.eu
FPE – Flexible Packaging Europe, www.flexpack-europe.org
Intergraf – European Federation for Print and Digital Communication, www.intergraf.eu
I&P Europe – Imaging and Printing Association, www.ip-europe.com
MPE – Metal Packaging Europe, <https://metalpackaging europe.org/>