

Revision of EU rules on food contact materials

Green Transition Denmark welcomes the opportunity to provide comments on the European Commission Roadmap on the revision of EU rules on Food Contact Materials (FCMs).

We have four overall points we consider essential:

1. The EU needs to ban all hazardous chemicals in all FCM to honour the commitments of the Green Deal and the new Chemicals Strategy for Sustainability (and not partial regulations, such as BPA).
2. Substantial changes are needed, and it is important that the possibility of creating better rules is not constrained by the limits of the current framework. Thus, Option 2 ('Develop a new regulatory framework, replacing the current Regulation') is the best choice.
3. Increased focus on the safety of the final article (FCMs), including Non-Intentionally Added Substances. Furthermore, to regulate
4. An overall advice to follow the five key principles (<https://chemtrust.org/wp-content/uploads/KP-sign-on-document-word-sept-19.pdf>), which should govern the future legislation on food contact materials (Green Transition Denmark, former The Danish Ecological Council, are co-signatories on this initiative).

Three positive points in the roadmap

- It is good that the Commission will have a higher focus on the final food packaging or food contact article in the future. Non-Intentionally Added Substances (the so-called NIAS), which constitute the biggest share of the chemical pollution that migrates into our food from food contact materials, is more or less uncontrolled today. But it is well known, that these NIAS accounts for a large proportion of the chemicals we are exposed to through our food and beverages. In essence, food contact materials should be sufficiently inert in order to prevent any hazardous chemicals from migrating into our food or leaking into the environment during its life cycle.
- It is very important that new FCM legislation applies the precautionary principle and therefore implements a generic approach to managing risks. This would prevent the most hazardous chemicals (called tier 1 substances in the roadmap), such as endocrine disruptors and chemicals that are carcinogenic or toxic to reproduction, from being allowed in FCM.
- The roadmap commits for better protection of sensitive populations, such as pregnant women and children. It also promises to consider the combination effects of chemicals. On the other hand, in order to really protect sensitive populations (e.g. small children), it is essential that all harmful chemicals are banned in all food contact materials, and not only food contact materials containing food intended for infants and children of 0-3 years, since smaller children also will have food intended for any age group.

Concerns related to the Commissions plans

➤ The IIA suggests devolving not only the work of providing information, but also a substantial element of defining safety and monitoring compliance to industry bodies, rather than public authorities. This is a worrying approach.

➤ The document does not say anything about the consumer's right to know about hazardous chemicals in the products they buy.

That many consumers want to know about the chemical content in food contact materials is shown by the high number of scans on food items in the Danish app "Tjek Kemien" (now also EU-based; "LIFE AskREACH").