

European Commission
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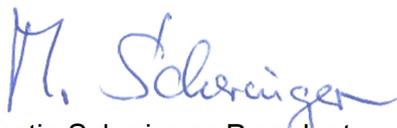
**European Commission roadmap on the review of the food contact materials legislation:
Food Packaging Forum comments on public consultation**

The Food Packaging Forum welcomes the opportunity to provide comments on the draft roadmap for the «Evaluation of Food Contact Materials». Our work is dedicated to providing scientific information pertaining to chemicals in all kinds of food contact materials (FCMs) and articles (FCAs), and their impact on health.

This evaluation offers the opportunity to reflect on the existing regulation from the perspective of most current scientific understanding. With more than 8'000 substances used in the manufacture of FCAs¹, and likely more than 10'000 substances present in finished FCAs as non-intentionally added substances² we see the need for innovative approaches for protecting public health from harmful chemical exposures to individual food contact chemicals (FCCs), but also to mixtures of overall migrants. We are especially concerned about the effects of migrating FCCs on the hormone, nervous and immune systems. Harmful effects can occur at very low doses, and especially developing fetuses are vulnerable. We would welcome regulatory approaches to protect this population group in particular.

We have recently published a detailed analysis of the scientific challenges in the risk assessment of food contact materials³ in form of a peer-reviewed scientific article. This analysis shows that current EU regulatory approaches and requirements do not adequately address actual chemical exposures from finished FCAs. One of the challenges relates to the current regulatory focus on starting substances. These compounds undergo significant transformation during FCA manufacture, so that the focus in terms of population-wide human exposure is better placed on those FCCs that migrate from the finished FCAs, since the average citizens are mostly exposed to these.

We trust that this evaluation will be carried out in a transparent way that invites input from all experts and stakeholders, and places a high value on independent scientific information. Our organization is open to providing input that may be of use to the European Commission in this evaluation process.



Martin Scheringer, President



Jane Muncke, Managing Director

¹ <http://www.foodpackagingforum.org/news/eu-study-on-non-harmonized-fcms-published>

² Grob, K et al. 2006. [Food contamination with organic materials in perspective: packaging materials as the largest and least controlled source?](#) A view focusing on the European situation. Crit. Rev. Food Sci. Nutr. 46(7), 529-535.

³ <http://www.foodpackagingforum.org/news/risk-assessment-of-fcms-overview-of-key-scientific-challenges>