

Food Contact Materials

Feedback to the European Commission

Document addressed to the European Commission by SAFE – Safe Food Advocacy Europe ASBL

SAFE thanks the Commission for allowing citizens and interested stakeholders to provide a feedback on the migration limits for lead, cadmium and other materials from ceramic and vitreous food contact materials.

We take this opportunity to provide the Commission with inputs on the issues which need to be covered during the impact assessment and we would like to point out some elements that are worthy of concern.

First of all, there are many materials largely used as FCMs (such as paper, ink, adhesive or glues) which are not controlled by harmonised EU-level laws. Even though they are commonly used in Europe, they are unregulated and their safety has not been evaluated by any national authority.¹ On this matter, we recommend the adoption of specific rules on those non-harmonizingly regulated materials and encourage the Commission to adopt a legally binding legislation which includes all FCMs to secure a higher level of protection for EU consumers.

Thanks to its chemical composition, glass presents several advantages for food contact material applications and is considered to be safer when compared to plastic. Latest data show glass recycling rates reached 74% across EU member states, with more than 11.6 million tons of glass bottles which are transformed into new glass containers.² However, repeated recycling of glass may lead to the accumulation of unwanted substances in the material which may form during the recycling process. Therefore, SAFE would like to draw the attention on the recycled and reusable glass and calls for a binding legislation to guarantee its safety. For instance, glasses from applications other than packaging should not be included in container glass recycling due to a different chemical composition which can affect the safety of the material by introducing hazardous elements.³

¹ European Food Safety Authority, (2012) *Report of ESCO WG on non-plastic Food Contact Materials*. <https://efsa.onlinelibrary.wiley.com/doi/abs/10.2903/sp.efsa.2011.EN-139>

² Morris G., (2018) *FEVE: EU Glass Packaging Closed Loop Recycling Steady at 74%*. <https://www.glass-international.com/news/view/feve-eu-glass-packaging-closed-loop-recycling-steady-at-74>

³ Geueke et al., *Food packaging in the circular economy: Overview of the chemical safety aspects for commonly used materials*, Journal of Cleaner Production 193 (2018) 491 – 500.

Lastly, with regard to ceramic articles, the current EU legislation (Directive 2005/31/EC) regulates only the well-known elements of lead and cadmium while it does not consider other metals, such as aluminium, cobalt, chromium, manganese, fluorine, arsenic, nickel or zinc which cause high safety concerns as well. Studies show those elements represent considerable risk for public health as they can potentially migrate from the material into foodstuff, especially in case coloured glazes are applied.⁴ It is therefore important to have updated studies on the issue to minimize the migration of heavy metals through good manufacturing practices.

In conclusion, SAFE calls for a comprehensive legislation which takes into consideration other toxic trace elements with a view to ensure a higher level of protection among European consumers.

⁴ Demont et al., *Migration of 18 trace elements from ceramic food contact materials: Influence of pigment, Ph, nature of acid and temperature*, Food and Chemical Toxicology 50 (2012) 734 – 743.