Joint feedback to the EU Roadmap on the "Chemicals Strategy for Sustainability"

The undersigned associations welcome the EU Roadmap on the Chemicals Strategy for Sustainability and support the objectives to enhance citizens and environment protection, while ensuring the functioning of the internal market, in line with the principles set by the European Green Deal.

The Strategy will build on the existing initiatives and policy evaluations, including the fitness check of the chemical legislation and those in the areas of products and food.

Chemicals are part of everyday life and a building block of all natural and man-made products. In this perspective, they are also used in the production of food contact materials and articles (FCM). The FCM are essential to ensure consumers safety and for the overall sustainability of the food system, as it was also recently proven by the COVID-19 crisis. Food packaging maintains the quality of the packaged food and is the means to provide information to consumers on content, origin, nutrition values and safety. In addition, food packaging reduces food waste and contributes to sustainability by protecting products during logistic and storage phases.

In the context of the Chemicals Strategy for Sustainability, we suggest that:

- The Commission continues with further harmonization of the EU legislation on food contact materials emphasizing the use of safe chemicals and the principles of quick adaptation to scientific and technical progress. 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 consumers safety, they must be manufactured in accordance with the Good Manufacturing Practices (GMP) Regulation 2023/2006 and provide for traceability at all stages of production. Nonetheless, EU specific measures exist only for a limited number of materials, for example on plastic, ceramics, recycled plastic. Although specific measures are missing, the non-harmonised sectors put consumer safety first and use their best endeavours to ensure equivalent safety for consumers and to demonstrate compliance. We call on the **Commission to propose specific measures to harmonise safety requirements for all other materials and create a level-playing field**. This will ensure that the same high consumer safety standards apply all over Europe, while deepening the single market and reducing barriers to trade in food contact materials and packed products. In turn, this will generate economies of scale and improve the competitiveness of European companies.

- Further evaluation of the **"one substance – one assessment"** principle for the risk assessment of individual substances should be performed reflecting the specificities of the different sectors. It will streamline the work of the EU agencies and avoid duplications but at the same time **a sector specific approach would be needed to address the risk (not the hazard) posed by certain chemicals used in food contact materials**. In this regard, we support further collaboration between EFSA and ECHA on substance assessment wherever relevant. Data on chemicals and their evaluation currently available at ECHA could provide useful information for the risk assessment of food contact materials. However, this approach should not target oversimplification leading to "one size fits all" solution**.** EFSA should be the responsible body

for risk assessment and management of food contact materials, in conformity with the provisions of the Food Law and the Food Contact Framework Regulation.

We call on the Commission to speed up the EU harmonisation of food contact materials and evaluate the possible use of the existing data- and knowledge base as part of the Chemicals Strategy for Sustainability to support this 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 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

EuPC - European Plastics Converters Confederation

EuPIA- a sector of CEPE: European Printing Ink Association

FEFCO - European Federation of Corrugated Board Manufacturers

FPE - Flexible Packaging Europe

Intergraf - European Federation for Print and Digital Communication

I&P Europe - Imaging and Printing Association

MPE - Metal Packaging Europe

MPMA – Metal Packaging Manufacturers Association

Brussels, 19 June 2020