

PLASTIC MATERIALS

1. Scope

This section deals with materials and objects in plastic made entirely of plastic or composed of one or two layers each of which is made entirely of plastic and when they are as finished products, they are intended to be in contact with food products.

This section does not involve materials and objects which are not intended, under the current terms of use or in other reasonably expected conditions, to be in contact with foodstuffs, for example: floor, ceiling and wall coverings, vehicle dashboards, aprons, tablecloths, food trays. However, honeycomb trays in direct contact with foods are included.

2. Restrictions of use for materials

- ◆ Restrictions of use may exist for materials which contain some additives. All useful information shall be communicated to the laboratories.
- ◆ Recycled materials without the same guarantees as the new materials, for which they could substitute themselves cannot be used in contact with food in accordance with CSHPF [The Upper Council for Public Hygiene in France] notification dated 7/9/93 on recycled materials (published in the BOCCRF [Official Bulletin for Competition, Consumption and Repression of Fraud] dated 31/12/93).

Before the marketing of such materials, a file shall be presented to the AFSSA [French Food Safety Agency] notification. The file shall particularly, contain information relating to the waste sources used, the quality of the waste collection, the sorting methods used, the decontamination process implemented and its efficacy, the conformity of the finished material of the regulations and controls carried out on all manufacturing operations to prove that the finished materials produced meet the regulations relating to materials intended to be in contact with foodstuffs.

3. Definitions performance criteria for food contact

3.1 Texts to be used

3.1.1 Regulatory texts

The order of 2/01/2003 relating to materials and objects in plastic put in or intended to be in contact with foodstuffs, food and drink products (directive 2002/72/CE of 6th August, 2002).

3.1.2 Other texts

Information notice No 2003-27 from the DGCCRF relating to additives to plastic materials intended to be in contact with foods.

Other texts relating to plastic materials (circulars, circular letters, instructions etc) collected together in Brochure No. 1227 of the Official Journal.

3.2 Criteria to be used

At each stage of manufacturing of a material or an object, the producer shall check that the various constituents used are included in the positive lists.

When the product or material is finished, the manufacturer or the user should check that the inertia criteria are met, i.e.:

- The positive list and the supplier's limits of use have been respected, evidence of conformity from suppliers,

- Overall migration according to the order of 2/01/2003,
- Specific migration* of monomers and/or residual quantity of monomers in the material or object according to the order of 2/01/2003,
- Specific migration* of additives and/or quantity in the material of object.

* Checking specific migration limits is not mandatory if it can be established that the result of the overall migration test implies that the specific migration limits have not been passed, or that the specific migration limit cannot be passed even if all the residual substance migrated.

Respect for the specific migration limits can be checked by determining the quantity of the substance in the material provided that a relationship between this quantity and the value of the specific migration of the substance has been established either by a suitable experiment, or by applying generally recognised diffusion models (order dated 2/01/2003, article 8).

4. Acceptability limits

- Overall migration limit laid down with the order dated 2 January 2003 (Art. 2), i.e. 10 mg/dm² or 60 mg/kg of food according to the geometry of the material or the object. A material or an object whose migration level exceeds the overall migration limit by an amount not exceeding the analytical tolerance defined below will be considered as conform to the order (art.8 and chapter VI of the appendix to the order):
 - 20 mg/kg or 3 mg/dm³ in migration tests using rectified olive oil or its substitutes;
 - 12 mg/kg or 2 mg/dm³ in migration tests using other simulators laid down in directives 82/711/CEE and 85/572/CEE.
- Specific migration limits of monomers and/or maximum residual quantities of monomers in the material or the object (article 7 and chapter I of the annex to the order of 2/01/2003).
- Specific migration limits of additives and/or maximum quantities in the material or object if necessary, specified in the above text (in particular the article 7 of chapter II of the annex to the order of 2/01/2003).
- Specific migration limit of epoxy derivatives, the limits are specified in the order of 2 April 2003.

5. Rules to check the criteria defined in paragraph 3.

- In order to check the migration criteria, the following information shall be given to the laboratory:

- Material references;
- Nature of monomers and additives subject to specific migration limits or maximum residual quantities, without revealing confidential information;
- Contact conditions (duration and temperature);
- Type of foods in contact or simulator liquids.

- Test conditions according to directive 82/711/CEE amended by directives 93/8/CEE and 97/48/CEE, and directive 85/572/CEE (Order dated 2/01/2003, article 8):

- Temperature and contact duration;
- Simulator liquids (chosen according to the foods involved).

Methods to be used for overall migration according to the standards in the series NF EN 1186

Methods to be used for specific migration according to the experimental standards for the measurement of specific migrations from the series prEN 13130-1 to 28 or technical specifications CEN/TS of series 13130 part 1 to 28 a current work on CEN/TC 194 SC1 relating to the determination of BADGE, BFDGE and their derivatives as well as the NOGE and its derivatives.