

COATED PAPER AND CARDBOARDS

1. SCOPE

This applies to materials and objects made of paper or cardboard coated with wax, wax with additives, paraffins, paraffins with additives, silicones and polymeric emulsions that in the finished product state are designed to come into contact with foodstuffs.

It does not apply to complex paper or cardboard-based materials or plastic films that are covered by the "Complex materials" sheet.

Papers and cardboards coated with a continuous coat considered to be equivalent to a lamination process are covered by the "Complex materials" sheet.

In cases in which there is a risk that the coating does not play a "barrier" role, the paper or cardboard support must meet the applicable requirements (see sheet concerning papers and cardboards).

Examples:

- Paraffin or polyethylene-coated papers, for wet or greasy foodstuffs (e.g. meat and cheese);
- Papers and supports with mould release coatings (e.g. silicones) intended for cooking;
- Papers coated with fluorinated compounds for wet or greasy foodstuffs (e.g. confectionery);
- Papers, cardboards and packaging coated with aqueous acrylic emulsions for wet or greasy foodstuffs (e.g. pastries);
- Papers and cardboards coated with PVDC (e.g. plates).

2. RESTRICTIONS ON THE USE OF MATERIALS

Wax or paraffin-coated papers and cardboards cannot be used at temperatures in excess of 40°C.

3. DEFINITIONS OF SUITABILITY CRITERIA FOR CONTACT WITH FOODSTUFFS

3.1 TEXTS TO BE USED:

3.1.1 STATUTORY TEXTS:

- European Parliament and Council (EU) regulation N° 1935/2004 dated 27 October 2004 concerning materials and articles intended to come into contact with food, repealing directives 80/590/EEC and 89/109/EEC, published in the Official Journal of the European Union on 13 November 2004
- Regulation (EC) N° 1895/2005 of the Commission, dated 18 November 2005 concerning restriction of use of certain epoxy derivatives in materials and articles intended to come into contact with foodstuffs;
- Consumer code (Legislative Part) – Volume II – Section 1:
 - Compliance with Chapter II – General requirement to comply with Article L212-1: Requirement for self-checks and to provide proof of checks;
 - Compliance with Chapter IV – Measures for the implementation of Article L214-1: Enforcement measures; Paragraphs 2 and 3 Sanctions in the event of failure to comply with the orders contained in Articles L.214-1 and L214-3 and in the event of putting on sale before the results of analysis of goods recognized as unlawful;

- Consumer code (Legislative Part) – Volume II – Section 2:
 - Safety – Chapter 1 – Prevention Article L221-1: General safety requirements concerning products and services applicable to professionals, requirement to inform the consumer of a product's inherent risks, requirement for the person responsible for offering the item for sale to adopt measures which, given the characteristics of the products that he is supplying, allow him to keep himself informed of the risks that the products that he is selling may pose and to take all the necessary measures to handle these risks;
- Order N° 92-631 dated 8 July 1992, as amended, concerning materials and objects intended to come into contact with foodstuffs, products and drinks for consumption by humans and animals;
- Order dated 2 January 2003, as amended, concerning materials and objects made from plastic, placed or intended to come into contact with foodstuffs, products and drinks transposition of Directive 2002/72/CE;
- Texts grouped together in brochure N°1227 of the Official Journal of the French Republic;
- Circular N° 162 dated 25 April 1952 concerning the regulations on the subject of coatings and varnishes for containers;
- CSHPF Notice dated 7 November 1995 concerning inks and varnishes for printing of packaging intended to come into contact with food.

3.1.2 OTHER TEXTS:

- Guide to good practices in the manufacture of papers and cardboards and transformed articles made from paper and cardboard designed to come into contact with foodstuffs, approved on 9 September 1997 by the food and nutrition section of the CSHPF;
- European Council Framework resolution AP (2004) 1 on coating intended to come into contact with foodstuffs and its changes concerning coatings;
- FDA CFR Section 21 – Chapter I – Sub.B Part 175 – Sub.C – Sec.175.300 Resinous and Polymeric Coatings;
- Waxes and Paraffins:
 - FDA CFR Section 21 – Chapter I – Part 172 –Sec.: 172.886 and Part 178 – Sec.178.3719 (Petroleum wax);
 - BfR Recommendation XXV;
- Others: See FDA and BfR.

3.2 CRITERIA TO BE USED:

3.2.1 COMPOSITION CRITERIA:

For paper or cardboard supports: If the coating does not play a "barrier" role, comply with the requirements of the papers and cardboard sheet for the type of contact with foodstuffs concerned.

For the coating: Comply with the positive lists referred to in 3.1.1.

When the coated paper or cardboard is printed, see the Notice dated 7 November 1995 referred to in 3.1.1 for the pigments and dyes permitted, for solvents and for the purity criteria. The printed side must not come into contact with the foodstuffs, even when protected by a varnish or lacquer.

3.2.2 COATING MIGRATION CRITERIA:

At the finished material or object stage, the manufacturer or user must check that the migration criteria are met by conducting global migration tests and, where applicable, specific migration tests (also see end note for waxes and paraffins).

4. ACCEPTABILITY LIMITS

4.1 PAPER OR CARDBOARD SUPPORT:

If the coating does not play a "barrier" role, comply with the requirements of the papers and cardboard sheet for the type of contact with foodstuffs concerned.

4.2 COATING:

Global and specific migration limits, where applicable (also see end note for waxes and paraffins).

5. RULES FOR CHECKING THE CRITERIA DEFINED IN PARAGRAPH 3

- In order to check the criteria defined in paragraph 3, the manufacturer shall check that he is in possession of the following information:
 - * nature of the coating products used;
 - * contact conditions;
 - * foodstuffs in contact.

- Test conditions in accordance with Directive 82/711, dated 18 October 1982, laying down the basic rules necessary for testing migration of the constituents of plastic materials and objects intended to come into contact with foodstuffs, amended by EEC Directives 93/8 and 97/48 and Council Directive 85/572/EEC, dated 19 December 1985, laying down the list of simulants to be used for testing migration of the constituents of plastic materials and articles intended to come into contact with foodstuffs, and Directive 2002/72/CE dated 6 August 2002 as amended, concerning plastic materials and objects intended to come into contact with foodstuffs (transposed into the Order dated 2 January 2003):
 - * temperature and contact time;
 - * simulating liquids (selected according to the foodstuffs concerned);
 - * global and specific migrations in cells in accordance with the NF EN 1186 series standards and technical specification CEN TS 14 234.

- Directive 81/432/EEC dated 29 April 1981 laying down the Community method of analysis for the official control of vinyl chloride released by materials and articles into foodstuffs.

Note:

For papers and cardboards coated with wax and/or paraffins, only aqueous simulants can be used as greasy simulants cause the coating to dissolve.

In the case of a contact with grease, the migration test is only required if the duration of contact may exceed a week. In that case, it is conducted using the foodstuff concerned or a representative foodstuff.