

**TRACEABILITY APPLIED TO TISSUE PAPER,
KITCHEN TOWELS AND NAPKINS**

I. SCOPE

This document describes procedures to ensure traceability of tissue paper kitchen towels and napkins (“kitchen towels and napkins”).¹

II. GENERAL INFORMATION

Kitchen towels and napkins have specific technical characteristics and perform specific functions that differentiate them from paper and board packaging materials and other paper products. They are multi-purpose products that have a broad cleaning and absorption function and are not primarily intended for food contact. However, sometimes they are put into contact with foodstuffs by the final users.

The limited and short-term use in food contact means that consumer exposure is very low. In contrast with food packaging materials, kitchen towels and napkins are not primarily designed for food contact. Consumer studies have shown that the main use of tissue products is for hygiene and cleaning, and that use in contact with foodstuffs is limited. For instance, it is estimated that only 27% of buyers of kitchen towels regularly use them in contact with food and that on average less than one kitchen towel (or about 1.2 gr.) is used in food contact per day per person.² In addition, kitchen towels and napkins are soft and exhibit a lack of structural resistance. Once they absorb a liquid they lose their properties and cannot be reused. Consumer studies confirm that, in case of food related use, the predominant function is to absorb moisture or fat and that food contact is typically limited to a few seconds. Use over 15 minutes is rare.³

In addition, the manufacturing processes used are designed to reduce the amount of impurities and contaminants, and the high level of purity of the products has been confirmed.⁴ Migration studies have also demonstrated the low migration profile of kitchen towels and napkins.⁵

Kitchen towels and napkins are not covered by the other provisions of the Code of Good Manufacturing Practice and this Appendix contains specific principles of traceability.

¹ For the purposes of this Appendix, professional towels/wipes used in a food environment are also considered kitchen towels.

² IPSOS kitchen towel survey, November 1999. The results of this study have been further confirmed by an internal study commissioned by Procter & Gamble.

³ IPSOS kitchen towel survey, November 1999.

⁴ “Migration Studies on Tissues in Contact with Food”, Council of Europe Committee of Experts on Materials Coming into Contact with Food, Ad Hoc Group on Tissue Papers, RD 6.3D/1-39#1; and “Survey on Tissue Papers in Food Contact”, Jean-Yves Escabasse, November 1999.

⁵ “Migration Studies on Tissues in Contact with Food”, Council of Europe Committee of Experts on Materials Coming into Contact with Food, Ad Hoc Group on Tissue Papers, RD 6.3D/1-39#1; and “Test report on presence of fluorescent whitening agents in two samples”, Council of Europe Committee of Experts on Materials Coming into Contact with Food, Ad Hoc Group on Tissue Papers, RD 6.3D/2-39#1.

III. TRACEABILITY PRINCIPLES

In determining relevant traceability principles, account has to be taken of consumer exposure and the production processes. The principles contained in this Appendix, together with the recommendations contained in the Council of Europe Guidelines on Paper Kitchen Towels and Napkins, contribute to achieve a high level of traceability for kitchen towels and napkins.

Traceability of finished products and raw materials enables an efficient recall procedure within a tissue mill where kitchen towels and napkins are produced and along the supply chain, and therefore further contributes to ensuring consumer safety. The information on traceability can also be made available to competent authorities if required.

a. Labelling of finished products

All finished products should be labelled so that relevant data of the production history can be traced.

b. Other procedures

It is recommended that manufacturers of kitchen towels and napkins put in place the following procedures:

- (i) For each delivery of raw materials, the date of delivery and the name of the supplier should be recorded. In addition, each delivery should be inspected on receipt to verify that it complies with relevant requirements. This information shall be kept for at least three years.
- (ii) Relevant documentation within the quality management system on the manufacturing site should be kept to enable identification of the finished products and raw materials that are considered to be involved in any recall of defective finished products.
- (iii) Manufacturers of kitchen towels and napkins should be able to identify the packaged kitchen towels and napkins, for instance by a code. Such identification should allow a link between the product and the manufacturing site and date of production to be made. The link between the identification of the product and the customer should be recorded and communicated to the customer where appropriate.