



Brussels, 22 December 2022

FEICA input to the Revision of EU rules on food contact materials

FEICA, the Association of the European Adhesive & Sealant Industry, is a multinational association representing the European adhesive and sealant industry. Today's membership stands at 16 National Association Members (representing 17 countries), 25 Direct Company Members and 24 Affiliate Company Members. The European market for adhesives and sealants is currently worth more than 17 billion euros. With the support of its national associations and several direct and affiliated members, FEICA coordinates, represents and advocates the common interests of our industry throughout Europe. In this regard, FEICA works with all relevant stakeholders to create a mutually beneficial economic and legislative environment.

FEICA welcomes the opportunity to provide input to the Commission's public consultation on the Revision of EU rules on food contact materials (FCMs). For clarification, we would like to offer supplementary comments in relation to some of the responses given in the questionnaire:

Scope of FCM Legislation

Q1 & Q2: In the questionnaire there are materials and elements under consideration that are already covered by other pieces of legislation, such as the General Product Safety Directive, the Medical Devices Directive or the rules on hygiene of foodstuffs. Such overlap needs to be prohibited.

Safety and Risk Management

Q3: The questionnaire does not distinguish between Intentionally Added Substances (IAS) and Non Intentionally Added Substances (NIAS), nor does it consider migration of substances. We consider immunotoxic and neurotoxic substances irrelevant to Food Contact Material.

Q4: a) Unfortunately the questionnaire was designed in such a way that FEICA could not answer the question. FEICA would like to insist that 'regulatory intervention' should be driven by the presence and concentration of a given substance in the food. This means that the focus should be on the migration of a substance from the food contact material into the food. In our view regulatory intervention should always be made on the European level and based on European Food Safety Authority (EFSA) assessments. Only the EFSA has the expertise to assess the risk for food contact material specifically.

Sustainability and Future Developments

Q6: We believe that all aspects, social, economic and environmental impacts (the three pillars of sustainability), need to be considered. For example, food waste needs to be considered as well as the needs of the consumers.

Information along the Supply Chain

Q9: f) FEICA agrees that full information on the composition of products shall be available to competent authorities throughout the supply chain. Indeed, FEICA companies supply information on

demand to authorities. However, further clarification of 'easily available' is needed. If this refers to a database, FEICA is concerned about the data protection aspect of such a project.

Q9: j) (last) On the intermediate level (in our case, adhesives), permitted uses are indicated to the downstream user (DU) in a generic way or to the extent that the exact application is known (i.e. do not heat to more than 70 °C). Disclaimers are needed as the actual use is not always known to the company producing the intermediate product and to make it clear that it is the responsibility of the DU to ensure that the final use is safe.

Contact

FEICA Regulatory Affairs:

Jana Cohrs (j.cohrs@feica.eu)

FEICA is registered in the **EU Transparency Register** with ID no. **51642763262-89**

FEICA - Association of the European Adhesive & Sealant Industry

Rue Belliard 40 box 10, 1040 Brussels, Belgium

Tel: +32 (0)2 896 96 00

info@feica.eu | www.feica.eu

Publication ref.: POP-EX-L12-068

This document has been designed using the best knowledge currently available, and is to be relied upon at the user's own risk. The information is provided in good faith and no representations or warranties are made with regards to the accuracy or completeness, and no liability will be accepted for damages of any nature whatsoever resulting from the use or reliance on this paper. This document does not necessarily represent the views of all member companies of FEICA.

Copyright © FEICA, 2022