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Food contact materials (FCMs) are widely used in packaging for everyday foods and beverages. While kitchen utensils tend to come into contact with foods only briefly, food packaging allows food to be stored for long periods, so extended contact can occur. Adhesives are used in almost all food packaging, to bond the different materials used, but direct food contact is rarely intended. By Jana Cohrs-Rahmoun, FEICA.

A STICKY SUBJECT

The adhesives industry is working hard to ensure that its products are safe. FEICA, the Association of the European adhesive and sealant industry, has published several guidance papers to help not only their own members but also the other actors of the Food Contact Material (FCM) supply chain to ensure that the final packaging is safe.

At the EU level, all FCMs are regulated by Regulation (EC) No. 1935/2004, also called the Framework Regulation. This legislation aims at protecting consumers' health, but also the effective functioning of the internal market in FCM. Regulation (EC) No. 2023/2006 additionally defined rules on good manufacturing practice (GMP) for materials and articles intended to come into contact with food. The Framework Regulation sets out the general principles and states that special measures can be implemented for various material types intended for food packaging. Several measures are already in place, implemented as European Directives or Regulations, which define the conditions and rules on how the requirements of the Framework Regulation should be met by a certain material group. The most widely known and most comprehensive measure is the 'Plastics Regulation', Regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food. However, no such measure exists for adhesives at the EU level, which can in some cases create uncertainty in the supply chain.

FEICA GUIDANCE FOR A FOOD CONTACT STATUS DECLARATION FOR ADHESIVES

In order to support adhesives manufacturers and downstream users, FEICA first published, in 2013, the FEICA guidance for a food contact status declaration for adhesives. This guidance contains tools, recommendations and answers as to which information needs to be collected from suppliers of raw materials for adhesives to aid the decision as to whether a raw material is suitable for a food contact application or not and where to find the corresponding legal texts for further information. It also provides a decision tree for evaluating the suitability of an adhesive for the intended application. Finally, this document explains what information needs to be provided on a food contact status paper so that adequate information is communicated to the next level in the supply chain.

By following the FEICA guidance for a food contact status declaration for an adhesive, adhesives manufacturers should be able to demonstrate that their products fulfil the requirements of the Framework Regulation by using the various proposed tools. Originally, the intention of Regulation (EC) No. 2023/2006 "on good manufacturing practice for materials and articles intended to come into contact with food" (GMP Regulation) was to cover especially those materials which are not yet regulated through EU regulations, e.g. printing inks, paper and adhesives. However, in reality it forces all actors in the FCM supply chain to make sure that the material or



MIGRATION TESTING

Whereas migration testing rules for plastics are described in the Plastics Regulation, no harmonised rules for adhesives are defined at a EU level.

Sometimes, conformity testing of adhesives in their structure can be necessary. However, due to a lack of defined testing methods for adhesives at a European level, customers often wish to carry out migration testing according to the migration testing rules for plastics. They are sometimes unaware that its principles do not in all cases apply to adhesives applications.

The FEICA guidance on migration testing of adhesives intended for food contact material aims to strengthen the relationship between the adhesives manufacturers and their customers by clarifying the specific situation of adhesives, when migration testing is considered.

article concerned is processed, controlled and evaluated in such a way that it is suitable for the intended purpose of food contact. Therefore, it could be said that the GMP Regulation is an implementation regulation to the requirements of Article 3 of the Framework Regulation (No. 1935/2004).

FEICA GOOD MANUFACTURING PRACTICE (GMP) GUIDANCE


The FEICA Good Manufacturing Practice (GMP) guidance, published in 2015, is aimed at helping the adhesives industry, customers and other stakeholders to better understand how to implement the GMP Regulation for adhesives. Some of the requirements of the GMP regulation can already be covered through an established and implemented Quality Management System (such as ISO 9001 and equivalent procedures). Therefore, FEICA guidance mainly concentrates on requirements which are either adhesive industry specific or additionally needed to comply with the Regulation (EU) No. 2023/2006.

FEICA GUIDANCE ON MIGRATION TESTING OF ADHESIVES INTENDED FOR FOOD CONTACT MATERIAL

In 2016, FEICA added another guidance paper to the package. The FEICA guidance on migration testing of adhesives intended for food contact material outlines specific recommendations in cases where conformity testing of adhesives as components of FCM is considered. As no harmonised rules for adhesives are defined at a EU level, this guidance should strengthen the relationship between adhesives manufacturers and their customers by clarifying the specific situation of adhesives where migra-

“Adhesives typically make up less than 5% of food packaging and, for most adhesive applications, direct food contact is not intended.”

tion testing is considered. Adhesives are very complex products. Thus, the guidance first defines the types of technologies used in adhesives for use in FCMs and their specific application (reactive polyurethane (PU) adhesives; adhesives based on natural polymers; dispersions / emulsions: adhesives based on vinyl acetate polymers (PVAc) or ethylene vinyl acetate (EVA) copolymers; dispersions / emulsions: adhesives based on acrylic polymers and copolymers, including styrene acrylate terpolymers and reactive systems; cold seals; heat seals; hotmelt adhesives).

The guidance continues to highlight typical problems and describes possible testing options, structuring the chapters along the technologies to make it easier for customers to find information on problems, when testing of adhesives is carried out with the procedures purely intended for plastics. The FEICA guidance on migration testing should provide answers, when compliance checks through migration testing of adhesives is discussed among customers, laboratories and adhesive suppliers. The adhesives industry is constantly working to ensure the safety of its products. Currently FEICA is working to update its factsheet on mineral oil in adhesives intended for food contact material. It is scheduled to be published in Q1 2017. 



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