

IMPACT: “Acquis communautaire” audits

Checklist – EU food laws

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Checklist FOODSTUFFS

- I. *Technical requirements for producing and selling foodstuffs in the EU*
- II. *Labelling requirements for producing or selling foodstuffs in the EU*
- III. *Packaging requirements*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.1. Production methods

I.1.1. Quick-frozen foodstuffs (Dir. 89/109/EEC)

In principle: - 18° or lower (Deviations allowed: transport / local distribution / retail cabinets)

Only air, nitrogen and carbon dioxide as cryogenic media (purity criteria)

Labelling indications: quick-frozen” + batch identification

I.1.2. Ionising radiation treatment (Dir. 1999/2/EC and 1999/3/EC)

Conditions for authorizing food irradiation (technological need, benefit to the consumer)

Sources of ionising radiation (e.g. gamma rays, w rays,...)

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.1. Production methods

I.1.3. Genetically Modified Organisms (GMOs)

(Reg. 258/97, Reg. 1829/2003, Reg. 1830/2003, Dir. 2001/18/EC, Reg. 65/2004)

Authorization: by European Food Safety Authority

Labelling: = compulsory for all GMO products

Aims: - inform consumers

- ensures that a product is traceable throughout the food chain

On the label: "contains GMOs" + unique alphanumerical identifiers (9 characters) assigned to the GMOs contained in the products

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.2. Foodstuffs for particular purposes or target groups

1.2.1. Foodstuffs for particular nutritional uses

1.2.2. Foodstuffs for use in energy-restricted diets for weight reduction

1.2.3. Dietary foods for special medical purposes

1.2.4. Processed cereal-based foods and baby foods for infants and young children

1.2.5. Infant formulae and follow-on formulae

1.2.6. Food supplements

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.2. Foodstuffs for particular purposes or target groups

1.2.1. Foodstuffs for particular nutritional uses (Dir. 89/398/EEC)

- *must be suitable for certain categories of persons (e.g. persons whose digestive system is disturbed; infants or young children; etc.*
- *“dietetic” or “dietary” is prohibited in the labelling of foodstuffs for normal consumption*

See specific directives in following slides

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.2. Foodstuffs for particular purposes or target groups

1.2.2. Foods used in energy-restricted diets for weight reduction

(Dir. 96/8/EC)

- *Compositional criteria (Annex 1)*
- *Label: "Total diet replacement for weight control" or "meal replacement for weight control"*

- +
 - *energy value in kJ and kcal*
 - *average quantity of minerals and vitamins*
 - *instructions for appropriate preparation*
 - *statement on the importance of maintaining an adequate daily fluid intake*
 - *etc.*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.2. Foodstuffs for particular purposes or target groups

1.2.3. Dietary foods for special medical purposes (Dir. 1999/21/EC)

- *Compositional and labelling requirements*
- *Label: requirements as in previous slide + following statements*
 - *the product must be used under medical supervision*
 - *the product is suitable or not for use as the sole source of nourishment*
 - *the product is intended for a specific age group (if appropriate)*
 - *the product poses a health hazard when consumed by persons not having the diseases or medical conditions for which it is intended*
 - *“For the dietary management of*
 - *etc.*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.2. Foodstuffs for particular purposes or target groups

1.2.4. Processed cereal-based foods and baby foods for infants and young children (Dir. 2006/125/EC)

- *Compositional requirements: only suitable ingredients (supported by scientific data)*

Annexes: lists of authorised products

- *Labelling: minimum age (> 4 months)
 presence or absence of gluten if age < 6 months
 energy value (in kJ and kCal) and proteins
 average quantity of each mineral and vitamin
 ...*
- *Maximum pesticide levels: 0.01 mg.kg (exceptions: Annex VI)*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

[I.2. Foodstuffs for particular purposes or target groups](#)

[I.2.5. Infant formulae \(Dir. 2006/141\)](#)

Very strict rules regarding:

- composition*
- maximum pesticide residues*
- labelling*
- advertising*
- marketing*

incl. stipulation of authorised food ingredients, compositional criteria, substances which may be used in the manufacture of the formulae, sales names, compulsory labelling information, etc.

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.2. Foodstuffs for particular purposes or target groups

1.2.6. Food supplements (Dir. 2002/46/EC)

= concentrated sources of nutrients (vitamins and mineral salts)

*Composition: Annex I: authorised vitamins and mineral salts
 Annex II: authorised vitamin and mineral formulations*

Labelling must contain:

- the term “supplement”*
- the category of nutrients in the supplement and/or the name of the nutrients and the quantity of each nutrient*
- recommended daily amount + risk warning*
- declaration – supplement is not a substitute for a varied diet*
- reference “This is not a medicinal product” is presentation of the product is similar to that of a medicinal product*
- warning that product should be stored out of the reach of young children*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

[1.2. Foodstuffs for particular purposes or target groups](#)

[1.2.7. Addition of vitamins and minerals to foods \(Reg. 1925/2006\)](#)

Annex I: Harmonised list of vitamins, minerals and certain other substances such as fibre, essential fatty acids, etc. which may be added to foods voluntarily.

Nutrition labelling:

- total amount of added vitamins and minerals
- amount of protein, carbohydrate, sugars, fat, saturates, fibre and sodium
- energy value of the product

(Dir. 90/496/EEC)

Maximum levels of vitamins and minerals that can be added to foods.

Vitamins and minerals may not be added to unprocessed fruit, vegetables, meat, poultry and fish, beverages > 1.2 % vol. Alc.

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.3. Additives, flavourings & extraction solvents

1.3.1. Additives

1.3.2. Flavourings

1.3.3. Extraction solvents

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.3. Additives, flavourings & extraction solvents

I.3.1. Additives

I.3.1.1. Framework Directive: general scheme (Dir. 89/107/EEC)

I.3.1.2. Authorised *colourants* (Dir. 94/36/EC)

I.3.1.3. Authorised *sweeteners* (Dir. 94/35/EC)

I.3.1.4. Additives *other* than authorised colours and sweeteners (Dir. 95/2/EC)

Annexes: Lists of authorised additives, maximum limits in foodstuffs, etc.
+ *specific purity criteria*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.3. Additives, flavourings & extraction solvents

I.3.2. Flavourings

I.3.2.1. *Authorised flavourings (Dir. 88/388/EEC + Dec. 88/389/EEC + Reg. 2232/96)*

- *Purity criteria + list of authorised substances*
(3 types: natural f., chemical f. and smoke f.)

- *Labelling:* *“flavouring” followed by a more specific designation or a description of the flavouring*

“natural flavouring” or any equivalent term if the flavouring is obtained directly from a substance or preparation found in animal or plant material

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.3. Additives, flavourings & extraction solvents

1.3.3. Extraction solvents (Dir. 88/344/EEC)

= a solvent which is used in an extraction procedure during the processing of raw materials, of foodstuffs, or of components or ingredients of these products and which is removed but which may result in the unintentional, but technically unavoidable, presence of residues in the foodstuff or food ingredients.

Annex I: Extraction solvents to be used in compliance with GMP for all uses (e.g. propane, butane)

Extraction solvents for which conditions of use are specified

Rules for determining purity criteria

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.4. Production of specific foodstuffs

1.4.1. Edible oils or fats

1.4.2. Edible caseins and caseinates

1.4.3. Partly or wholly dehydrated milk

1.4.4. Cocoa and chocolate

1.4.5. Honey

1.4.6. Fruit jams, jellies, marmalades and chestnut purée

1.4.7. Fruit juices and similar products

1.4.8. Natural mineral water

1.4.9. Coffee and chicory extracts

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.4. Production of specific foodstuffs

I.4.1. Edible oils or fats (Dir. 76/621/EEC + Reg. 2991/84)

Level of erucic acid in edible oils and fats \leq 5 % of total level of fatty acids

= protection from possible toxic effects of ingesting the acid

Which products? Oils, fats and blends intended for human consumption

Foodstuffs with a fat content of 5 % or more

+ specific labelling rules for spreadable fats (e.g. butter, margarine, etc.), incl. "reduced fat" claims

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.4. Production of specific foodstuffs

I.4.2. Edible caseins and caseinates (Dir. 83/417/EEC)

Harmonisation of composition and manufacturing characteristics of certain edible lactoproteins.

Labelling: "Mixture of..." followed by the names of the different products which make up the mixture; in decreasing order of weight, and the protein content in the case of mixtures containing caseinates.

Purity criteria

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.4. Production of specific foodstuffs

I.4.3. Partly or wholly dehydrated preserved milk (Dir. 2001/114/EC)

Annexes: products concerned (different types of preserved milk)

*Labelling: trade name +
% of fat (by weight in relation to the finished products) +
% of fat-free dried milk extract*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.4. Production of specific foodstuffs

I.4.4. Cocoa and chocolate (Dir. 2000/36/EC)

Composition of:

- cocoa butter
- cocoa and powdered chocolate
- chocolate, milk chocolate, white chocolate, filled chocolate, chocolates or pralines, etc.

(min. % of cocoa butter, cocoa powder, etc.)

*Authorization of ≥ 5 % of vegetable fat other than cocoa butter
(e.g. palm oil, ilepe, copra oil, shea, mango kernels, etc;)*

Labelling: sales names (e.g. “cocoa powder”, “chocolate”, etc.) can only be used if products meet compositional rules

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.4. Production of specific foodstuffs

I.4.5. Honey (Dir. 2001/110/EC)

Definition of honey as well as filtered honey and baker's honey.

Composition: "Honey" should not contain any added food ingredients or additives.

Annex II: composition criteria

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.4. Production of specific foodstuffs

I.4.6. Fruit jams, jellies, marmalades and sweetened chestnut purée (Dir. 2001/113/EC)

- Composition:*
- lists and definitions of raw materials which may be used*
 - fruit and sugar content*
 - authorised additives*
 - maximum sulphur dioxide content*
- + labelling rules*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.4. Production of specific foodstuffs

1.4.7. Fruit juices (Dir. 2001/112/EC)

Labelling should indicate when a product is a mixture of fruit juice and fruit juice from concentrate, and for fruit nectar, when it has been obtained entirely or partly from a concentrated product.

Member States may authorise the addition of vitamins and minerals to fruit juice, fruit juice from concentrate, concentrated fruit juice, dehydrated/powdered fruit juice, fruit nectar.

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.4. Production of specific foodstuffs

1.4.8. Natural mineral waters (Dir. 80/777/EEC)

Each Member State establishes rules for exploitation of sources of natural mineral water + inspects them regularly.

- Treatments: only treatments mentioned in the Directive are permitted.*
 - Microbiological analyses: criteria – see Directive*
 - Labelling and packaging: sales description specifies whether the water is naturally carbonated or fortified with gas from the spring*
 - trade name*
 - name and location of the spring*
 - analytic composition*
 - any treatments*
- + rules for using the term “spring water”*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.4. Production of specific foodstuffs

I.4.9. Coffee and chicory extracts (Dir. 99/4/EC)

Composition: *minimum requirements, in particular as regards the dry matter component*

Labelling: *only descriptions coffee extract, chicory extract, soluble coffee extract, soluble chicory, instant chicory and soluble or instant coffee may be used.*
+ “paste”, “liquid”, “concentrated” etc. and any added substances
+ the caffeine content
+ minimum coffee- or chicory-based dry matter content (as a % by weight of the finished product)

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.5. Hygiene of foodstuffs & other health aspects

1.5.1. Hygiene package (HACCP!)

1.5.2. Foodstuffs with ingredients of animal origin

1.5.2.1. Specific hygiene rules for food of animal origin

1.5.2.2. Production and placing on the market of specific animal-based foodstuffs

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

[1.5. Hygiene of foodstuffs & other health aspects](#)

[1.5.1. Hygiene package \(HACCP!\)](#)

*Reg. 852/2004: Annex I – general hygiene provisions for food business operators
Annex II – hygiene requirements for food premises, transport conditions, equipment, food waste, water supply, personal hygiene of persons in contact with food, food, wrapping and packaging, heat treatment, training of food workers (= activities other than primary production)*

+ HACCP system

(Guides to good practice and to the application of HACCP)

Reg. 178/2002: Traceability and withdrawal of products

Reg. 882/2004: Official controls

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.5. Hygiene of foodstuffs & other health aspects

1.5.2. Foodstuffs with ingredients of animal origin

1.5.2.1. Specific hygiene rules for food of animal origin

Reg. 853/2004: specific hygiene rules for food of animal origin

- *Approval of establishments*
- *Health marking and identification (oval mark with name of producing country and the establishment's approval number)*
- *Specific rules for different categories of products:*
meat products (meat of poultry, meat of farmed game or wild game meat) fishery products, milk and milk products, egg and egg products, frog's legs and snails, gelatine, collagen, etc.

Reg. 854/2004: official controls on products of animal origin

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.5. Hygiene of foodstuffs & other health aspects

1.5.2. Foodstuffs with ingredients of animal origin

1.5.2.2. Production and placing on the market of specific animal-based foodstuffs

1) Untreated and heat-treated milk (Dir. 89/384/EEC + Dec. 92/608/EEC)

- procedures for carrying out checks regarding the freezing point of untreated milk*
- methods for analysis and testing of heat-treated milk*

2) Aquaculture animals and products (Dir. 91/67/EEC)

- criteria and procedures for the granting, maintenance, suspension, restoration and withdrawal of approval of zones or farms that are free from serious endemic disease*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

I.6. Food contaminants

I.6.1. Maximum levels for certain contaminants (Reg. 466/2001)

Maximum quantities for:

- nitrates*
- mycotoxins (aflatoxins, ochratoxin A and patulin)*
- heavy metals (lead, cadmium, mercury)*
- 3-monochloropropane-1,2diol (3-MCPD)*
- dioxins and dioxin-like PCBs*
- inorganic tin*

Checklist Foodstuffs

I. TECHNICAL REQUIREMENTS

1.6. Food contaminants

1.6.2. Maximum residue levels (MRLs)

1) *Maximum pesticide limits for food products (Reg. 396/2005)*

All foodstuffs but in particular fruit and vegetables, cereals, foodstuffs of animal origin, products of vegetable origin and honey.

MRL = 0.01 mg/kg in all cases where an MRL has not been specifically set for a product or product type

2) *MRLs of medicinal veterinary products (Reg. 2377/90)*

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.1. General labelling requirements

II.2. Specific labelling rules for certain foodstuffs

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

[II.1. General labelling requirements](#)

II.1.1. General EU rules about labelling, presentation and advertising of foodstuffs

II.1.2. Identification of foodstuffs by lot

II.1.3. Nutrition values

II.1.4. Nutrition or health claims

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.1. General labelling requirements

II.1.1. General EU rules about labelling, presentation and advertising of foodstuffs (Dir. 2000/13/EC)

Compulsary labelling particulars:

- *name under which the product is sold*
- *list of ingredients and quantity of ingredients or categories of ingredients expressed as a percentage*
- *allergens (Dir. 2003/89/EC)*
- *net quantity*
- *date of minimum durability*
- *additional particulars for highly perishable foodstuffs (e.g. use-by date, special conditions for keeping and use; etc.)*

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.1. General labelling requirements

II.1.2. Identification of prepacked foodstuffs by lot (Dir. 89/396/EEC)

Lot = a batch of sales units of a foodstuff produced, manufactured or packaged under identical conditions

Labelling of lot: "L" + indication

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.1. General labelling requirements

II.1.3. Nutrition labelling (Dir. 90/496/EEC)

Nutrition labelling is optional but becomes compulsory if a nutrition claim is made on the label, in a presentation or in advertising.

Info must be presented according to:

*- **Group 1** (energy value and amount of protein, carbohydrate and fat)*

or

*- **Group 2** (energy value and amount of protein, carbohydrate, sugar, fat, saturated fatty acids, dietary fibre and sodium)*

Information must be expressed per 100g, 100 ml or per package.

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.1. General labelling requirements

II.1.4. Nutrition and health claims (Reg. 1924/2006)

Annex lists various claims, including: “low energy”
“with no added sugars”
“high fibre”
etc.

Each claim is defined using precise and quantifiable values.

If a health claim is made, Dir. 90/496/EEC on nutrition labelling must be applied.

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.2. Specific labelling requirements for certain foodstuffs

II.2.1. Alcoholic drinks

II.2.2. Milk or milk products

II.2.3. Foodstuffs or food ingredients containing GMOs

II.2.4. Foodstuffs containing quinine or caffeine

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.2. Specific labelling requirements for certain foodstuffs

II.2.1. Alcoholic drinks

1) Labelling of alcoholic beverages (Dir. 87/250/EEC)

- Definition of alcoholic strength by volume
- Tolerances allowed in respect of the indication of the alcoholic strength by volume
(e.g. 0.5 % for beers > 5.5 % vol.)

2) Definition, description and presentation of spirit drinks (Reg. 1576/89)

- Definition of each type of spirit drink (“rum”, “whisky”, “vodka”, etc.)
- Minimum alcoholic strength (e.g. 40 % for whisky)

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.2. Specific labelling requirements for certain foodstuffs

II.2.1. Alcoholic drinks

3) *Definition, description and presentation of aromatized wines, aromatized wine-based drinks and aromatized wine-product cocktails (Reg. 1601/91)*

- *Rules regarding use of water in the preparation*
- *Rules regarding use of ethyl alcohol to dilute or dissolve additives*

4) *Labelling of wine and certain other wine sector products (Reg. 753/2002)*

- *Labelling must indicate alcohol content & presence of sulphites, where applicable*
- *special labelling rules for table wines, quality wines, new wines still in fermentation, imported products, liqueur wines and sparkling wines, etc.*

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.2. Specific labelling requirements for certain foodstuffs

II.2.2. Labelling of milk products (Reg. 1234/2007)

Definitions and designations in respect of milk and milk products:

- *milk*
- *whey*
- *cream*
- *butter*
- *butteroil*
- *caseins*
- *anhydrous milkfat (AMF)*
- *cheese*
- *yogurt*
- *kephir*
- *koumiss*
- *etc.*

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.2. Specific labelling requirements for certain foodstuffs

II.2.3. Labelling of GM food and feed (Reg. 1829/2007, 1830/2007)

A single authorisation procedure for all food and feed containing GMOs.

Labelling: food should be labelled as a GMO if the product or its components contains GMOs

(Exceptions for GMOs $\leq 0.9\%$ per ingredients and the presence of GMOs is adventitious or technically unavoidable)

Traceability standards (Reg. 1830/2003)

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.2. Specific labelling requirements for certain foodstuffs

II.2.4. Labelling of caffeine and quinine (Dir. 2002/67/EC)

Compulsory = labelling of presence of quinine and caffeine

If caffeine > 150 mg/l: “high caffeine content” on label + quantity specified

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.3. Labelling rules related to specific indications

II.3.1. Traditional specialties and geographical indications of origin

II.3.2. Organically grown agricultural products and foodstuffs

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.3. *Labelling rules related to specific indications*

II.3.1. Traditional specialties and geographical indications of origin

1) *Agricultural products and foodstuffs as Traditional Specialities Guaranteed (TSGs) (Reg. 509/2006)*

TSGs recognised at Community level are entered into a register of products.

2) *Protection of Geographical Indications (PGI) and Designations of Origin (PDO)*

Applications for TSGs, PGIs and PDOs may only be made by a group of producers or processors.

Checklist Foodstuffs

II. LABELLING REQUIREMENTS

II.3. *Labelling rules related to specific indications*

II.3.2. Organically grown agricultural products and foodstuffs (Reg. 2092/91)

Rules of production

*Annex I specifies the **principles of organic production** for plants, livestock (cattle, pigs, sheep, goats, horses and poultry), bees, and all products thereof. This concerns criteria for the choice of breeds, feed and veterinary treatment.*

*Annex II explains **which substances may be used** as pesticides, soil fertilisers feed and detergents for animals.*

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Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.1. Prepacked products

III.2. Packaging and packaging waste

III.3. Food contact materials

Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.1. Prepacked products

III.1.1. Deregulation of pack sizes (Dir. 2007/45/EC)

Regulations prescribing mandatory nominal quantities for prepackaged products are banned (some exceptions allowed till 2012/2013 for milk, butter, dried pasta, coffee and sugar).

Wines and spirits: Annex contains list of nominal quantities of prepackages

Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.1. Prepacked products

III.1.2. Prepacked products (Dir. 76/211/EEC)

Prepackages, i.e. packages prepared in advance, must indicate on the labelling the weight or volume they contain, taking account the maximum permitted measurement errors.

Use of the EEC mark

Prepacked products may bear the EEC mark (“ e ”) if they comply with the requirements set out in the Directive with regard to quality and metrological control (Annex I, section 5 and Annex II).

Label: weight or volume + EEC mark

Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.2. Packaging and packaging waste (Dir. 94/62/EC)

This Dir. covers all packaging and packaging waste

Member States have to take measures to prevent the formation of packaging waste and to develop packaging reuse systems.

MS must introduce systems for the return and/or collection of used packaging to attain certain targets.

Enterprises have to register at national schemes in and pay a contribution for the type and quantity of packaging they bring on the market as a producer, importer, etc.

(Example: Green dot system)

Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.3. Materials and articles intended to come into a direct contact with foodstuffs

III.3.1. “Active” and “intelligent” packaging (framework legislation)

III.3.2. Plastic materials

III.3.3. Ceramic articles

III.3.4. Materials and articles made of cellulose film

III.3.5. Vinyl chloride monomer

Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.3. Materials and articles intended to come into a direct contact with foodstuffs

III.3.1. “Active” and “intelligent” packaging (Reg. 1935/2004)

Labelling rules for “active” food contact materials

“Empty” packaging, to be used by consumers for storing food, must be marked with the words “for food use” or bear an associated symbol (glass and fork)

Authorisation for “intelligent” packaging (e.g. provides info on the quality / freshness of the product) and “active” packaging (e.g. preserves it for longer by introducing favourable chemical modifications).

Traceability requirements from production to sale (comparable with similar rules for the foodstuffs themselves).

Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.3. Materials and articles intended to come into a direct contact with foodstuffs

III.3.2. Plastic materials and articles (Dir. 2002/72/EC)

Positive list with approved substances (e.g. monomers, additives) with specific conditions of use and maximum limits of migration to foodstuffs (in mg/kg or mg/dm²) = Specific Migration Limits (SMLs)

Total amount transferred from plastic articles to foodstuffs \leq 60 mg/kg or 10 mg/dm²

Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.3. Materials and articles intended to come into a direct contact with foodstuffs

III.3.3. Ceramic objects (Dir. 84/500/EC)

Ceramics can transfer toxins (lead and cadmium) to foodstuffs.

If products are intended to come into contact with foodstuffs:

written declaration from the manufacturer or seller stating that they do not exceed the maximum limits for the transfer of lead and cadmium.

Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.3. Materials and articles intended to come into a direct contact with foodstuffs

III.3.4. Regenerated cellulose film (Dir. 93/10/EEC)

= a film obtained from refined cellulose derived from wood or cotton that have not been recycled. Appropriate substances can be added to the body or surface of the material for technological reasons.

Types:

- uncoated*
- with coating derived from cellulose*
- with coating consisting of plastics*

Annex II: *list of substances that can be used + conditions of use*

Printed side: *must not be allowed to come into contact with foodstuffs*

Checklist Foodstuffs

III. PACKAGING REQUIREMENTS

III.3. Materials and articles intended to come into a direct contact with foodstuffs

III.3.5. Materials containing vinyl chloride monomer (Dir. 78/142/EEC)

Such materials must not contain VCM in a quantity exceeding 1 mg/kg of finished product and must not pass on to foodstuffs more than 0.01 mg/kg of VCM.