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FSANZ
PO Box 10559
The Terrace, Wellington 6143
New Zealand

16th December 2014

Dear Sir

Re P1034 – Chemical Migration from Packaging into Food

I am writing on behalf of Plastics New Zealand, the Industry Association representing plastic manufacturers and material and service suppliers to the Industry.

Our organisation has a close association with PAC NZ, with both organisations having plastic packaging companies as part of their membership base.

Plastics New Zealand has a small office team of 3 part time staff, and does not employ a food safety technical specialist. However, all the plastic material suppliers who import material from overseas principals are Members and this can give access to polymer specialists who we can call upon if need be. Equally, Plastic New Zealand can also be a communications conduit keeping Members updated on this and other relevant food safety matters.

I believe our Packaging Members are aware of the increasing importance of food safety. Equally, they understand that as a major food exporter, the country needs to be abreast of good science, risk assessment studies, overseas trends and legislative actions and act accordingly. In return they would expect imported plastic packaging used in direct food contact would be subject to the same standards and scrutiny.

As you indicate the Industry does rely heavily on the major overseas material producers or local additive and masterbatch suppliers developing, testing and providing materials that meet EU and /or US food grade standards.

Where New Zealand manufacturers are importing overseas recycled material (eg RPET) and/or sandwiching post-consumer recycled material between virgin layers, we would expect that this material or substrate would also be required to be tested to these food grade standards.

Most of the other questions you raise are best answered by those companies involved in the supply chain.

We would appreciate being apprised of your Consultation outcomes and activities and if I can be of further assistance please don't hesitate to contact me.

Yours faithfully

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Business Manager
Plastics New Zealand