



**INTEGRATED
PACKAGING**
'we go to greater lengths'

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Integrated Packaging submission to Proposal P1034

Introduction

Integrated Packaging (IPG) is an Australasian based film manufacturing group that was established in 1982 and has grown both organically and through acquisition to its current position where IPG manufactures across five locations in Australia (Melbourne, Perth, Sydney (2) and Mildura) and Auckland New Zealand. We employ more than 400 people with 3,000 customers globally. IPG operates 9 warehouse facilities in key locations and employs more than 50 sales and customer service personnel across Australia and New Zealand.

IPG is committed to product R & D and innovation, owning several world first patents. Each manufacturing site is supported by a site based technical team working together to continue IPG's position at the forefront of innovation. Current areas of development include source reduction products, biodegradable products, and the evolution of food safety for our food contact films. We are also committed to recycling at our Mildura facility which manufactures recycled plastic composite products which represents both our commitment and passion for sustainable solutions.

IPG has documented ISO 9001 quality assurance and HACCP systems which are 3rd party audited and certified at each site.

We are a signatory to the Australian Packaging Covenant for sustainable packaging, and are members of APMA (Australian Packaging Machinery Association), PACIA and the Australian Vinyl Council.

Food Standards:

Food contact films are an integral part of our product range and IPG is the market leader in the supply of PVC food films into the Australian and New Zealand markets. As part of our commitment as a responsible Australasian business, we align this range of products with industry best food safety practices, using European and US food safety agency standards for guidance. Consequently, we have removed Phthalate from our production and processes and conduct routine tests as part of a QA program to ensure zero Phthalate in the films that we produce.

Our recommendation for regulatory measures for Food Safety

IPG is a significant stakeholder in the supply of food films in Australasia, and we are obviously concerned that the whole industry adopts a responsible approach to food safety. We recognise that each of the participants in the industry has a different capability and level of commitment to maintaining high standards of food security, particularly importers, who have limited resources to manage the risk associated with packaging materials bought in from less developed countries. Therefore, we favour Option 4 which is a set of guidelines for low risks chemicals but regulatory for high risk chemicals such as phalates, and adopt the best practice standards in place internationally (e.g. EU, US or other regulations). This would ultimately form a graduated approach that has prescriptive solutions for chemicals of high risk, together with guidelines for lower risk chemicals, and an information and education program to industry.

Please find our submission attached.

Yours faithfully



John Cerini
Chief Executive Officer



Integrated Packaging : response to FSANZ call for submissions – Proposal P1034

Please see below our responses in blue to the 20 questions posed in the FSANZ call for submissions of 10.06.2016.

- Q1 Do you consider that an ongoing monitoring and surveillance strategy, possibly by jurisdictions responsible for enforcement and compliance of food laws would be a practical measure to identify and manage unknown risks associated with CMPF.

No, the actual monitoring and surveillance strategy is not effective to enforce the existing guidelines for all manufactured or imported film due to the range and quantum of packaging materials and suppliers. This would require the revision of the Food Act to encompass importers and manufacturers of food contact packaging.

- Q2 Do you agree that FSANZ's analysis of control measures and market information accurately represents how CMPF is being controlled in Australia and New Zealand? If, not please state your reasons.

From our perspective, the conclusion that a small number of manufacturers represent a high market share is incorrect, in our market segment there is a significant amount of food packaging materials that are imported from a large number of countries, including less developed countries. We also believe that some of the imported product is misclassified within the tariff regime, obscuring the true level of importation.

- Q3 For any industry stakeholders who have yet to respond to FSANZ's call for information: What control measures for CMPF does your business use.

We maintain a watching brief on developments in the European and US food safety agencies, to guide the evolution of our products and the materials that we use to manufacture them. We adopt a best practice approach to ensure our products comply to the globally accepted regulations and practices to ensure food safety is key to Australia/NZ and Australian/NZ industries to remain relevant and to maintain its reputation as a safe food leaders.

IPG has as a result removed Phthalate from our production and processes. We conduct routine tests as part of a QA program to ensure Zero Phthalate in the films that we produce.

- Q4 What problems can you identify with the status quo option and therefore abandoning this proposal.

The status quo, of laissez-faire approach ensures that there is little incentive for suppliers of food contact packaging to pay any regard to CMPF, particularly because of the low level of awareness of this issue in the food processing and consumer markets. As a result there are packaging products on the market which contain phalates at levels far beyond safe levels and propose potential risks to food users.

Q5 If you consider that a prescriptive approach is the most appropriate option as per either the US/and/or EU approach, FSANZ invites you to elaborate on those reasons. Specifically, please provide the pros and cons of this position in order to further identify costs and benefits for consumers, industry and government of taking a prescriptive approach.

Building the necessary resources to administer a prescriptive regime will be very time consuming and costly, and will impose unnecessary burdens on the industry. It would also introduce a long period of uncertainty whilst the process was rolled out.

Q6 What do you see as the costs/benefits of Option 3: Non-regulatory approaches (a) Education/Awareness/Information programs for consumers, industry and government? Do you consider it would ensure industry has adequate knowledge of the risks from CMPF and implemented available risk mitigation measures.

Education and the provision of information about CMPF is an important component in any risk management scheme that is introduced to address this issue. However, it is important that the industry is in a position to respond effectively to consumer awareness, so that consumers are able to exercise choice, rather than leaving the responsibility to consumers to motivate such a response from the industry.

Q7 Focusing on the three key areas outlined above, what information do you think would be the most suitable to include in an information/awareness program.

The obligations on food businesses (particularly SMEs) to use safe packaging materials.

Q8 Do you agree that FSANZ, the AFGC/NZFGC and packaging peak bodies are the most appropriate organisations to undertake this program? If not, can you identify other appropriate agencies, and peak bodies.

Yes.

Q9 What are the perceived cost and benefits for industry, consumers and industry of a non-regulatory approach? Do you think either option 3a, 3b (Industry self-regulation by industry standards or codes of practice) or 3c (Industry self-regulation by a co-regulatory approach) would be cost effective.

This is a low cost but ineffectual approach, it will not provide adequate control over less responsible participants in the industry and will provide no clear choices to consumers in regard to product compliance.

Q10 A guideline would involve a degree of prescription (although it would not be mandated in the Code). FSANZ invites stakeholders to identify the costs and benefits to industry, consumers and government of this approach in assisting industry (specifically SMEs), with identifying, characterising and managing risks arising from CMPF.

The prescriptive part of such a guideline would relate to chemicals of concern or high risk – it is appropriate that there is absolute clarity and safety around the management of such chemicals – this approach is the most effective, and therefore cost effective risk management approach for this subset of chemicals.

The guideline would also provide a monitoring function for chemicals of low risk, allowing industry participants to develop their plans and responses as the knowledge about them evolves, before they are potentially re-categorised as chemicals of concern.

Q11 Would the above information be appropriate for including in a guideline or can you identify others that should be included.

As noted in the above answer, the guidelines should also provide an information on the evolution of knowledge on chemicals used in the manufacture of food contact packaging, including from the European and US jurisdictions.

Q12 Should all the industry standards and COPs? identified in option 3b be included in a guideline under this current Proposal (versus a separate process) to maximise coverage of all requirements for packaging or only specific ones that include reference to food safety measures or prescribed limits in them? In your answer please be as specific as possible to identify the most-appropriate guideline that would address CMPF.

Focus should be narrowed to food safety issues only so as not to over complicate communication.

Q13 What do you see as costs and benefits for government, consumers and industry of this measure (strengthening the Code)? Would it be cost effective? Please detail any other options that you think are appropriate, or available, to strengthen or clarify existing Code requirements and the reasons why, including the costs and benefits of such a measure.

Food safety is the result of both the processes associated with the production of the foodstuff, and with products that are in contact with that foodstuff, including packaging. Therefore the codes should address both the food and food contact products.

Q14 Do you consider that there is scope to improve the Food Acts provisions regulating the sale of food packaging in Australia and New Zealand.

Yes.

Q15 Do you consider that the Code should include specific limits for DEHP and DINP for all foods similar to the limits set used for other packaging chemicals (tin, vinyl chloride and acrylonitrile). What do you see as the costs and benefits to industry, enforcement agencies and consumers of this approach?

Yes. We should adopt best practice and food safety is paramount for Australian/NZ consumers. DEHP and DINP levels should be set at zero. Safety cannot be compromised.

Q16 Which peak bodies should be involved in familiarising industry with any new provisions or raising awareness of CMPF.

Industry associations such as the Vinyl Council together with FSANZ.

Q17 How could post-market surveillance be conducted satisfactorily? Who would undertake such surveillance.

Post market surveillance to be conducted by NICNAS.

Q18 How will the options listed affect you; such as the choices available to your business and current process practices, consumption choices or regulatory activities.

We will continue to develop and evolve our products and processes to confirm with best international food safety practice.

Q 19 Are there other affected parties that have not been identified by FSANZ that you feel should be included.

No

Q 20 Are there specific costs or benefits to consumers, industry and/or government that you feel should be considered in a future Regulation Impact Statement? If you have any data or information to support your views on these questions, FSANZ would welcome the opportunity to consider it.

No