Proposal P1034
Chemical Migration from Packaging into Food

Consultation Paper

The NSW Food Authority supports FSANZ's review of the public health and safety risks associated with chemical migration from packaging into foods (CMPF). There have been a number of advances in food packaging technology in recent years and it would be appropriate to ensure any risks are being effectively managed by existing regulatory and non-regulatory systems.

When considering the potential public health and food safety issues associated with CMPF any assessment should be based on actual risk and not perceived risk. Any perceived risk should be managed by an appropriate risk communication strategy to provide factual information to stakeholders.

When considering the appropriate approach to managing the risk it should be acknowledge that many food packaging companies already have mature systems in place to manage the risks associated with CMPF. As such, non-regulatory approaches such as industry guidelines or code of practices based on current best management practices should be considered. It is acknowledged that there may be other businesses with less mature systems in place and any approach would need to consider how best to reach and communicate with these businesses.

Should there be the need for an enhanced regulatory approach; any requirements should be achievable by industry and also appropriate for enforcement agencies, while addressing the risk identified. These approaches would also need to consider that food packaging technology continues to evolve and if possible 'future-proof' the requirements to ensure risks are managed into the future.

ENDS

The views expressed in this submission may or may not accord with those of other NSW Government agencies. The NSW Food Authority has a policy which encourages the full range of NSW agency views to be submitted during the standards development stages before final assessment. Other relevant NSW Government agencies are aware of and agree with this policy.