

**SUBMISSION**

**by**

**NEW ZEALAND PAPER FORUM INC**

**To**

**Food Standards Australia and New Zealand**


**On**

**FSANZ Consultation Paper P1034**

**Chemical Migration from Packaging into Food**

**22 December 2014**

New Zealand Paper Forum  
Charles Miller, Chairman  
PO Box 58 280  
Botany, Auckland 2163



The New Zealand Paper Forum (NZPF) represents the interests of paper and paper products (including packaging) manufacturers and users in New Zealand. NZPF membership includes major manufacturers and distributors of paper and paper products, print companies and associated groups.

This submission is made to enable FSANZ to consider NZPF's views associated with Chemical Migration of Packaging into Food including their opinion that existing standards and monitoring techniques satisfactorily address this issue.

We would respond by highlighting:

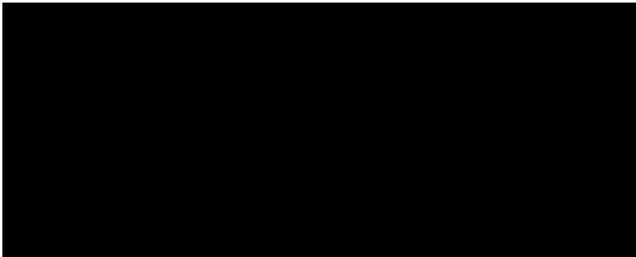
- The most recent FSANZ survey of chemical migration from food contact packaging materials in Australian food resulted in the following key finding: ***"Overall, the results from this survey provide reassurance that dietary exposure to chemicals which may migrate from food packaging is very low. Exposure at the estimated dietary exposure levels does not pose a human health and safety risk. This supports previous assessment undertaken by FSANZ."***
- Paper and paper packaging are internationally traded commodities and can therefore reasonably be assumed to be manufactured to international standards. The supply of the same materials to local reprocessors and export markets means local packaging has the risk profile of chemical migration proportional to compliance with EU and/or FDA food contact standards.
- The size of the domestic Australasian market for packaging is not great as a percentage of total global demand. International manufacturers will be unlikely to amend their testing regimes to accommodate a specific A/NZ requirement, particularly if they are already incurring the cost of testing to acceptable international standards.
- It is hard to justify the imposition of the cost of a new and additional testing regime if adequate checks are already being made, albeit that those existing checks (against EU and FDA standards) are not specifically domestically mandated.
- Legal obligations related to the sale and supply of food can be interpreted as requiring food packaging is fit for purpose. Both the Food Act 2014 and recent amendments to The Fair Trading Act 1986 place a responsibility on manufacturers of packaging to deliver product that complies with food manufacturers' requirements. It is efficient and therefore cost effective to rely on these existing obligations rather than impose food related obligations on the entire volume of packaging produced.

Regulatory expectations are for a progressive increase in the use of recycled substrates for the production of packaging and other materials. The litter and waste reduction targets underpinning these regulations have obvious social and environmental benefits. Packaging manufacturers and supply chain managers have an obligation to comply with all applicable regulation. It is therefore necessary for regulations impacting the same matter (eg packaging) to take account of other regulated expectations by establishing a clear hierarchy of responsibility or sufficient flexibility.

- The incentives already operating throughout the supply chain are to produce a safe and efficacious product. It is not unreasonable to assume that designers, specifiers and brand owners making packaging decisions are motivated to ensure the safety of the products they produce and purchase.
- The discussion document cites a number of specific instances of unacceptable chemical migration from packaging but does not provide detail specific scenarios or risk factors giving rise to chemical migration risk. The volume and nature of food in a package influences the degree to which contact might be a risk, as does the expected residence time in the package. The many variables that can reasonably be expected to apply may be a justification for a non-regulatory approach to the management of CMFC issues.
- The comment in the discussion document related to the use of EU and FDA standards by A/NZ manufacturers supplying international markets is supported, being an acknowledgement that the supply chain is currently subject to adequate assessment and testing.

## **Summary and Conclusions**

NZPF believes that current systems and standards offer sufficient management of the risk of chemical migration into food packaging.



Charles Miller  
Chairman