



Food  
Packaging  
Forum



Research

# Brand Owners' Product Stewardship for Food Packaging



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Food Packaging Forum Webinar  
11-June-2018

# Outline


- Chemicals of Concern
- Food Safety Alliance for Packaging (FSAP)
- Food Packaging Product Stewardship Document

# The Public Worries about Chemicals in Food Packaging

Endocrine Disruptors  
Bisphenol-A (BPA)  
Ortho-Phthalates  
Perfluoro (PFAS)  
Mineral Oils  
Etc...

SCIENTIFIC BLOGGING  
SCIENCE 2.0

## Everything Is An Endocrine Disruptor, Claims French Activist Researcher Barbara Demeneix



**CHEMTrust**  
Protecting humans and wildlife  
from harmful chemicals

### From BPA to BPZ: a toxic soup?

Companies switch from a known hazardous chemical to one similar properties, and how regulators could stop them

HOME • NEWS

## What Are Phthalates—And Should We Be Worried?

f p t v e r



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Sleeping upright because you can't sleep lying flat?

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## California Bill Would Prohibit Fluorinated Chemicals in Fast Food Packaging

March 30, 2017



## Danish group's testing finds cadmium and mineral oils in dark chocolate

By Joseph James Whitworth

06-Apr-2018 - Last updated on 06-Apr-2018 at 10:20 GMT

f 55 t in e POST A COMMENT



# There is a Complex Food Packaging Supply Chain with Chemicals



# Chemicals Can Move From Packaging Into Food

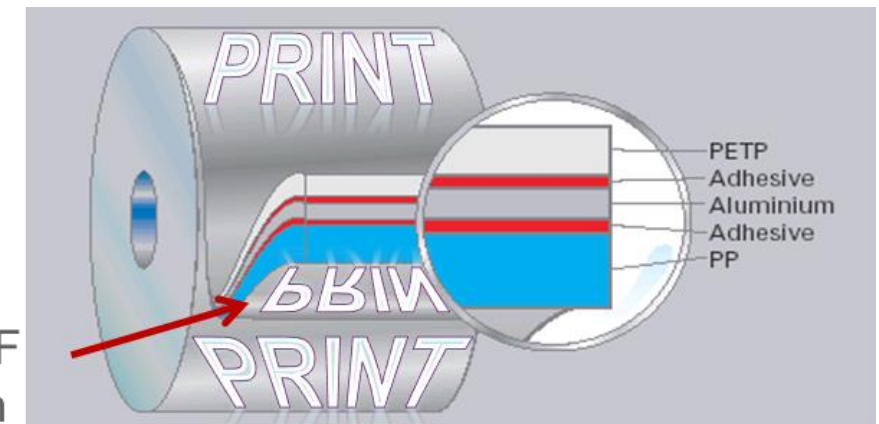
- **Through the packaging migration**
  - Chemicals with high potential of migration
  - Non-functional barrier packaging



- **Set-off migration**

Contamination transfer of chemicals from the printed side of the packaging to the unprinted side (i.e. food contact side) when rolled or stacked

SET-OFF  
Migration



# Outline

- Chemicals of Concern
- Food Safety Alliance for Packaging (FSAP)
- Food Packaging Product Stewardship Document

# FSAP – Food Safety Alliance for Packaging

- FSAP is a technical committee of IoPP (Institute of Packaging Professionals)
- FSAP consists of members from the food packaging supply chain – including base material suppliers, converters, and brand owners.
- FSAP started many years ago to create model HACCP for packaging supply chain
- Remade into a food packaging safety group



# FSAP – Food Safety Alliance for Packaging

- Group which discusses packaging food safety topics of interest to members
- Discussions are generally about regulations or Hot Topics - i.e. chemicals in the news
- Follows IoPP anti-trust guidelines
- Skype calls every-other month and a face-to-face (F2F) meeting every year
- Open to IoPP members who are in the food packaging industry/value chain, including chemical suppliers, and want to promote the packaging food safety agenda



# FSAP – Brand Owners’ Working Group



- A byproduct of the FSAP F2F meeting in 2016, was a brand owners’ working group
- Initial goal was to harmonize all the brand owners’ lists of chemicals into a standardized format and aligned as much as possible
- The document had the working title of “harmonization of lists” or “the list” for short
- Nestlé led the working group effort

# FSAP – Brand Owners' Working Group



- After a few telco's it was found there was not much overlap between brand owner's lists
- The goal was then adjusted to make a publicly available, best practices document for chemicals of concern in food packaging
- The working group gave itself a target deadline of the next F2F meeting in late October 2017

# Outline

- Chemicals of Concern
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- Food Packaging Product Stewardship Document

# The End Result:

- FSAP published a document titled:

## Food Packaging Product Stewardship Considerations

- This document is a voluntary set of food packaging quality and safety recommendations.
- Published March 2018
- Document is publicly available at: [www.iopp.org/fsap](http://www.iopp.org/fsap)



**Food Packaging Product Stewardship Considerations:**

**I. Background/Introduction**

This document was created to provide a guideline to suppliers of food packaging. This is a voluntary set of considerations that a supplier or food producer is welcome to use (in whole or part) as a roadmap for awareness on quality issues and minimizing or eliminating chemicals of concern from food packaging. This document may go beyond regulatory requirements. This document is an output of a food brand owners' working group to harmonize many different lists of chemicals of concern and quality considerations. The working group members are a part of the Food Safety Alliance for Packaging (FSAP), a technical committee of the Institute of Packaging Professionals (IoPP).

This non-binding list can be used as a best practice for the formulation of food packaging for consumer products. The listed items are grouped by packaging part and substances. The considerations are as follows:

1. **Should not use intentionally (where suitable alternative exist):** Listed items should be replaced where a safe and technically suitable alternative exists.
2. **Minimize Use:** should use as much as necessary to achieve a technical effect, but no more.

**II. Criteria for Listing**

The substances comprising the attached list are selected based on one or more of the following criteria:

1. Local, state, federal, regional, or international regulatory requirements



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# Food Packaging Product Stewardship Considerations

The document has an introduction page and several tables



## Food Packaging Product Stewardship Considerations:

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#### **Food Packaging Prod**

- Legal requirements considered.
- The below considera

*Packaging applications, which have a higher risk due to use (e.g. ovenable/microwavable, etc) or sensitive target consumer (e.g. infant/toddler food, etc), should have additional safety assessments and possibly more stringent requirements to be considered when developing.*

Packaging part/component	Substance(s) / Topic(s)	Description	Should not use intentionally (where suitable alternatives exist)	Minimize Use	Additional Information/ references



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# Identifying Packaging Quality & Safety Concerns

Several inputs were reviewed for inclusion in this document:

- 1. Local, state, federal, regional, or international regulatory requirements
- 2. Food and consumer safety considerations
- 3. Environmental protection
- 4. Negative impact on product quality
- 5. Consumer and retailer interest



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# Food Packaging Product Stewardship Considerations

Before publication, the document was circulated for feedback amongst FSAP members of the supply chain.

The responses were, for the most part, positive and helpful for fine-tuning the document.

Some enthusiastic,

Some negative



***Food Packaging Product Stewardship Considerations:***

- Legal requirements must first be followed for food contact materials, then the below best practices can be considered.*
- The below considerations in many cases go beyond regulations, if there is a conflict, regulations must be followed. Packaging applications, which have a higher risk due to use (e.g. ovenable/microwavable, etc) or sensitive target consumer (e.g. infant/toddler food, etc), should have additional safety assessments and possibly more stringent requirements to be considered when developing.*

Packaging part/component	Substance(s) / Topic(s)	Description	Should not use Intentionally (where suitable alternatives exist)	Minimize Use	Additional information/ references
		Phthalates should not be used as			

# Feedback – Food Packaging Product Stewardship

One item that came up several times in the feedback was that some recommendations go beyond regulations...

**Can you do that??**



# Food Packaging Product Stewardship Considerations

Column headers in the tables:

Packaging part/component	Substance(s) / Topic(s)	Description	Should not use intentionally (where suitable alternatives exist)	Minimize Use	Additional Information/ references
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- Packaging part/ component
- Substance(s) / Topic(s)
- Description
- Should not use intentionally (where suitable alternatives exist)
- Minimize Use
- Additional Information/ references

# Food Packaging Product Stewardship Considerations

Examples:

Packaging part/component	Substance(s) / Topic(s)	Description	Should not use intentionally (where suitable alternatives exist)	Minimize Use	Additional Information/ references
Latex in cold seal	- Natural rubber latex	- Should only be used when applied to sealing areas; i.e. contact with food should be avoided.		X	Allergen risk. Only as allowed by regulations.

Can coatings and Plastic resins (e.g. polycarbonate) containing Bisphenol A	Bisphenol A (BPA, 80-05-7)	- Bisphenol A based materials should not be used where suitable alternatives exist.	X		Prop65, SVHC, Consumer interest
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# Food Packaging Product Stewardship Considerations

- This is version 1.0
- The working group plans to review and revise as needed.
- Updates would be needed when new quality, safety, regulatory and/or public concerns arise



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# Food Packaging Product Stewardship Considerations

- Keep in mind that this document is **based on brand owners' lists** already in existence.
- There is **nothing new** with the items listed in this document.
- One difference overall is that this document is **publicly available**.
- And so, can **start the discussion**



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# Food Packaging Product Stewardship Considerations

External response has been **generally positive**.

IoPP issued a Press release. Several digests picked it up and published it including:

Product Stewardship Society, ChemicalWatch, EDF Blog, etc.

Packaging World's The Legal Side devoted the April column to it.

## THE LEGAL SIDE

INFORMATIONAL ONLY, NOT LEGAL ADVICE.

### Packaging group offers suggestions for stewardship



**ERIC F. GREENBERG** ATTORNEY-AT-LAW

It's a fixture in most corners of the food contact world: The giving and receiving of guarantees. The guarantees address the materials' compliance with Food and Drug Administration food contact materials requirements and many other legal or regulatory structures, or make representations about product characteristics. Called by various names such as 'product stewardship' or 'quality' information, suppliers often have to provide these guarantees before converters will

use their materials or end users will accept the products.

Though it's a very common practice to ask for and pass along these

use all or parts of this non-binding document as a roadmap for product stewardship considerations." As it developed the list, "input was given by brand owners including Nestlé and Mars Wrigley Confectionery and packaging supply chain members including Decernis, Siegwark, American Packaging Corp and Henkel." In addition to briefing the FDA about the list, FSAP gave several industry players a chance to look it over before publication and incorporated some of their suggested changes.

The list, available at [www.iopp.org/fsap](http://www.iopp.org/fsap), describes itself as "non-binding." It is organized in terms of considerations of substances that should not be used intentionally when "suitable alternatives" exist, and substances whose use should be minimized. The list defines minimiza-

Packaging World - April 2018

# Food Packaging Product Stewardship Considerations

Several NGO's wrote positively about the FSAP list, including FPF.

Transparency is seen as a good thing.

Chemical Watch published two articles:

- One mentioned the press release in March and
- a longer article appeared in April.



**ChemicalWatch**  
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## 'Significant' food packaging guide goes beyond regulatory minimums

Document reflects concerns of brand owners, consumers

5 April 2018 / Food contact, Substances of concern, United States

The new Food Safety Alliance for Packaging (FSAP) **guidelines** are significant, and potentially controversial, because they go beyond regulatory requirements, and are based primarily on preferences of brand owners.



Published by an informal technical committee of the Institute of Packaging Professionals (IOPP), the guidelines urge suppliers to avoid using certain chemicals in food packaging.

"This is a way to improve transparency as well as harmonisation," said Stephen Klump, global head of packaging quality and safety at Nestle and a key contributor to the document.

ChemicalWatch— April 5, 2018

# Food Packaging Product Stewardship Considerations

FSAP website lists some of the participants who gave their input:

- Mars-Wrigley Confections, Nestlé, and
- Supply chain members including: Henkel, Decernis, Siegwerk, American Packaging Corp and Sun Chemical.

Reminder: this document gives more **transparency in the supply chain**

**Institute of Packaging Professionals**

## Welcome to FSAP

FSAP is the **Food Safety Alliance for Packaging**, a technical committee of the [Institute of Packaging Professionals](#).

FSAP is a group of individuals from food companies and the food packaging supply chain dedicated to raising **food quality and safety awareness for the food packaging industry**.

- [FSAP Guiding Principles \(Draft\)](#)

FSAP discusses food packaging topics during a bi-monthly call. In addition, there is a yearly face-to-face meeting.

The FSAP food company working group has published a document of **Food Packaging Product Stewardship Considerations**. The working group aims to provide a list of product stewardship best practices in a publicly available document for all of the food packaging supply chain to access. For this document, input was given by brand owners including Nestlé and Mars Wrigley Confectionery and packaging supply chain members including, Decernis, Siegwerk, American Packaging Corp., Henkel and Sun Chemical.

Food companies and members of the packaging supply chain are welcome to use all or parts of this non-binding document as a roadmap for product stewardship considerations.

**Link: [Food Packaging Product Stewardship Considerations FSAP-IoPP v1.0](#)**

For questions, please contact Stephen Klump ([stephen.klump@rd.nestle.com](mailto:stephen.klump@rd.nestle.com)), the FSAP food company working group's representative.

Presentations for the supply chain:

A technical committee of:

**Institute of PACKAGING PROFESSIONALS**

**OFF-FLAVOR AND OFF-ODORS** are a huge concern to the consumer and Consumer Food Packaging Companies which packaging can effect. Be sure to understand the impact of your process and upstream inputs.

**A MAJOR CONTRIBUTOR** of recalls is due to mixed copy and allergens in the marketplace

**FSAP AIMS TO HELP THE** Packaging Industry understand the chemical hazards that can occur in the food packaging



Research

# Food Packaging Product Stewardship Considerations

## SUMMARY:

- Published by FSAP/IoPP
- A voluntary set of food packaging quality and safety considerations.
- The packaging supply chain could use this document as a road map for future developments.
- Document is available at: [www.iopp.org/fsap](http://www.iopp.org/fsap)



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# Thank you for your attention

## ¿Questions?