

September 16, 2026

Comments on the European Commission's call for evidence related to "Packaging and packaging waste – conditions for importing recycled materials into the EU for use in packaging"

Dear colleagues,

The [Food Packaging Forum Foundation \(FPF\)](http://foodpackagingforum.org) welcomes the opportunity to provide evidence to develop conditions for importing recycled materials into the European Union for use in packaging. FPF is a non-profit, independent, science-based research and communications organization working at the science-policy interface, with expertise in hazardous chemicals in all types of food contact materials.

The import of recycled materials from outside of the EU presents challenges regarding traceability, transparency, chemical safety, and verification of claims throughout the supply chain. Robust requirements are therefore important to ensure that imported recycled materials meet standards equivalent to those applied within the EU, including with respect to chemical safety to protect European consumers in sensitive applications such as food packaging.

The available scientific evidence makes it clear that recycled plastics can contain substances of very high concern (SVHCs), other hazardous chemicals, and chemicals with unknown toxicological profiles originating from the original product formulation, previous uses, or contamination during recycling processes. There is a wide range of toxicological effects many of these substances have been found to cause, including at exceedingly low concentrations and in chemical mixtures migrating from food contact articles. The chemical safety of highly complex and non-inert materials such as recycled plastics and paper therefore warrants that imported materials from outside of the EU are properly vetted for their chemical safety before being used in food packaging.

FPF has developed and maintains the [FCCmigex](#) and [FCCprio](#) databases, which compile publicly available scientific evidence on chemicals detected in all types of food contact materials, including virgin and recycled plastic and paper food packaging, together with associated hazard information. These resources may provide useful evidence to support the development and evaluation of chemical safety of imported recycled materials, and FPF would welcome opportunities to share relevant data and expertise with the Commission.

To ensure imported materials are chemically safe for food packaging applications and given the large number of known food contact chemicals available, traceability and transparency of chemicals throughout the packaging value chain should be ensured. At a minimum, this could include making information on intentionally added substances, including additives and processing aids, available to all stakeholders in the value chain, including importers, regulators and consumers. Guidance is further needed for the identification and management of potentially problematic non-intentionally added substances (NIAS) that may be present in recycled materials, of which experts estimate there may be tens of thousands of additional chemicals.

To protect European consumers and enable a safe circular economy, scientific evidence shows that imported recycled materials need to be subject to robust, transparent, and verifiable requirements on chemical composition and safety. This includes novel approaches for assessing the mixture toxicity of the overall migrate. We see an opportunity here for the Commission to fund dedicated research and development with the aim of improved testing methods that allow for establishing chemical safety according to Article 3 of Regulation (EC) No 1935/2004.

We remain available to provide further information within this process to assist in the development of conditions that enable the safe use of imported recycled materials for packaging.

Kind regards,

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Jane Muncke, *Managing Director and Chief Scientific Officer*