

WHITE PAPER

GUIDELINES FOR NON-PLASTIC FOOD ***CONTACT MATERIALS***

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Europe-specific
content



Regulations for Food Contact Materials

- Active and intelligent materials and articles
- Adhesives
- Ceramics
- Cork
- Rubbers
- Glass
- Ion-exchange resins
- Metals and alloys
- Paper and board
- Plastics
- Printing inks
- Regenerated cellulose
- Silicones
- Textiles
- Varnishes and coatings
- Waxes
- Wood



In Europe, there are two important regulations for food contact materials: **Framework Regulation (EC) No. 1935/2004** and the **Regulation on Good Manufacturing Practice (EC) No. 2023/2006 (GMP)**.

Apart from these two, there are a few specific guidelines or codes of practice for individual material groups. The **most relevant** is the legislation on plastic materials intended to come into contact with food, namely **Regulation (EU) No. 10/2011**.

According to Article 2, Paragraph 2, this regulation specifically is not valid for adhesives and coatings, but **only applies to plastics**. Food packaging very often consists of different materials. Therefore, it is not sufficient for multi-material multi-layer packaging to be governed solely by a specific regulation relating only to plastic layers. Non-plastic materials like adhesives, coatings and inks also have to comply with certain rules. At the end of 2013, the European Commission issued the **Union Guidelines on Regulation (EC) No. 10/2011** on plastic materials and articles intended to come into contact with food as regards information in the supply chain.

These guidelines are intended to clarify the responsibility of the different operators and define how to share compliance work throughout the production chain. Referring to both the Framework Regulation and the GMP Regulation, the European Commission explains the **necessary information exchange between the supplier and the customer, and**

vice versa, along the whole supply chain. Adherence to this procedure should ensure that the final product fulfills the legal requirements and is safe for the consumer.

As no specific requirements relating to adhesives exist in Europe, the Association of the European Adhesive & Sealant Industry (**FEICA, Fédération Européenne des Industries de Colles et Adhésifs**) as well as national associations like the German adhesive association (**IVK, Industrieverband Klebstoffe**) have laid down rules prescribing the provision of information about food contact adhesives in the supply chain. In March 2016, the German Technical Committee for Paper and Packaging Adhesives (TKPV) published technical briefing notes with the titles “Food Legislation Status of Adhesives” and in Juni 2015 “Guideline: Good Manufacturing Practice”. In March 2022, FEICA published a new “Guidance for a food contact status declaration for adhesives”. In March 2015, FEICA published the “Guideline for Good Manufacturing Practice of food packaging adhesives in Reference to Regulation (EU) No.2023/2006”.

According to these provisions, **adhesive producers are able to demonstrate that their products are safe for food contact by applying the general rules of Framework Regulation (EC) No. 1935/2004 and those of Regulation (EC) No. 2023/2006** on Good Manufacturing Practice, despite the fact that there is no specific set of requirements for this material group.

Key take aways

- The Framework Regulation (EC) No.1935/2004 and the Regulation on Good Manufacturing Practice (EC) No. 2023/2006 (GMP) are two important EU regulations for food contact materials.
- Non-plastic materials like adhesives, coatings and inks also have to comply with the rules laid down in both regulations.
- The European Commission explains in the “Union Guidance on Regulation (EU) No.10/2011 on plastic materials and articles intended to come into contact with food as regards information in the supply chain” the necessary information exchange between the supplier and the customer along the whole supply chain.
- Guidelines aim to clarify the responsibility of the different operators and to define how to share compliance work.
- In line with recent provisions, adhesive producers are able to demonstrate that their products are safe for food contact.

Literature and Useful Links

Framework Regulation (EC) No. 1935/2004

<https://eur-lex.europa.eu/eli/reg/2004/1935/oj/eng>

Regulation on Good Manufacturing Practice (EC) No. 2023/2006

<https://eur-lex.europa.eu/eli/reg/2006/2023/oj/eng>

Union Guidance on Regulation (EU) No 10/2011

https://food.ec.europa.eu/document/download/18cbd7ca-64a9-4156-b1aa-f1747fcdc47a_en

IVK/TKPV: Food Legislation Status of Adhesives

<https://www.klebstoffe.com/wp-content/uploads/2023/10/TKPV-01-Food-Legisl-Status-Adh-2017-03-21-Layout-2023.pdf>

IVK/TKPV: Guideline: Good Manufacturing Practice

<https://www.klebstoffe.com/wp-content/uploads/2023/10/TKPV-03-GMP-engl-2020-12-15-Layout-2023.pdf>

FEICA Guidance for a food contact status declaration for adhesives

https://www.feica.eu/information-center/all-information-centre/preview/1214/feica-guidance-food-contact-status-declaration-adhesives?id=6525026e-4967-4856-a56e-99608c193fab&filename=GUP-EX-L03-020_FEICA+Guidance+for+a+food+contact+status+declaration+for+adhesives.pdf

FEICA Guideline for Good Manufacturing Practice of food packaging adhesives in Reference to Regulation (EU) No 2023/2006

https://www.feica.eu/information-center/industry-guidelines/preview/951/feica-guidance-paper-2015-guideline-good-manufacturing-practice-food-packaging-adhesives?id=a3fe8c1a-c67c-415d-b293-afd45c52ebbe&filename=20170123213244-GUP-EX-E03-011_L_FEICA_GMP_Guideline.pdf

About Henkel

With its brands, innovations and technologies, Henkel holds leading market positions worldwide in the industrial and consumer businesses. The business unit Adhesive Technologies is the global leader in the market for adhesives, sealants and functional coatings. With Consumer Brands, the company holds leading positions especially in laundry & home care and hair in many markets and categories around the world. The company's three strongest brands are Loctite, Persil and Schwarzkopf. In fiscal 2024, Henkel reported sales of more than 21.6 billion euros and adjusted operating profit of around 3.1 billion euros. Henkel's preferred shares are listed in the German stock index DAX. Sustainability has a long tradition at Henkel, and the company has a clear sustainability strategy with specific targets. Henkel was founded in 1876 and today employs a diverse team of about 47,000 people worldwide – united by a strong corporate culture, shared values and a common purpose: "Pioneers at heart for the good of generations." More information at www.henkel.com.



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Thank you.

Contact

An expert team at Henkel is always available to answer your questions.

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