



Women engage for a common future

WECF's perspective on the revision of the Food contact materials Regulation

Women Engage for a Common Future (WECF) welcomes the EU's Public consultation on the revision of the Food contact materials regulation. WECF is an international ecofeminist organization that has been working on chemicals & health related issues since its beginning in 1994 and advocates for non-chemical alternatives worldwide. Through our advocacy work and our Nesting project, we raise awareness to the decision makers and the general public on pollutants in everyday products. The food contact materials regulation should be today in the EU more ambitious to be more healthy and more sustainable. As they are circulating in the EU, Food contact materials still contain harmful substances but are also not designed to be safe & sustainable through their entire life cycle.

To have safe & sustainable Food contact materials, we recommend to:

- Ban all the most harmful chemicals in Food contact materials. These should include the ban of substances that are endocrine disruptors but also substances that are persistent bioaccumulative and toxic (PBT), very Persistent and very bioaccumulative (vPvB), as well persistent mobile toxic (PMT) and very Persistent very Mobile (vPvM). These chemicals should be banned because they are harmful for human health but also for the environment, especially for the aquatic life. It is important that if these chemicals are banned in general consumers products, they should especially be banned in Food contact materials. The assessment of chemical substances should undergo, only one assessment under the whole EU chemical work frame, as established in the EU Chemical Strategy for Sustainability (One Substance one Assessment).
- Assess the toxicity of a chemical by taking under consideration vulnerable groups of populations (pregnant women, children, etc). Indeed, food for children often come in smaller packaging's. Because those are smaller the migration levels are higher and food for children end up being more contaminated than the ones for adults. Newborns and children are particularly vulnerable to toxic chemicals, and these can have important impacts on their healthy development.
- Use a mixture assessment factor. It is not only one substance that will migrate through food and together some chemicals can be even more toxic when ingested together but also when they are released in the environment.
- Ban chemicals in groups rather than individually. It is known that some groups of chemicals are harmful (Bisphenols, PFAs, phthalates etc..). to speed up regulatory processes these chemicals should be banned together.



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- Make clear links between the FCM regulation and the biocides regulation. Many FCM are treated articles under the Biocides regulation. There are partners of antimicrobial resistant growing due to the overuse of biocides, especially in Food processes (Salmonella etc..). Biocides should only be used on FCM when they are necessary (essential). Special analysis should be regarding the chemicals of the FCMs and biocides to make sure that they are safe. A special attention should be carried o the assessment of biocides under a nanomaterial form (eg nanosilver)
- Transparency along the supply chain on chemicals used in food contact materials. This is indispensable for companies to have information on what chemicals are used along the supply chain and have the safest disposal of these products. It is also important for consumers to make a choice in full awareness on how this packaging has been made and how it will be disposed.
- Address the sustainability of food contact materials. It is important that food contact materials in the EU are not only safe but also sustainable (in their production and disposal). Safe & sustainable by design criteria should be used for FCM but also products should not contain false sustainability claims (eg greenwashing adds).

References:

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