

FCM

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EPA Plans to Postpone PFAS Reporting Implementation Date

Recently, Germany's BfR released a new version of the recommendation for silicone, paper products, and high-temperature resistant coating materials. Although the recommendation does not have legal force, according to the RASFF violation notification, the provisions in the recommendation will be used by German officials as a basis for supervising the safety of food contact materials. Therefore, the requirements in the recommendation are widely adopted by the food contact materials industry. The main updates to the requirements for each material are as follows:

XV. Silicone

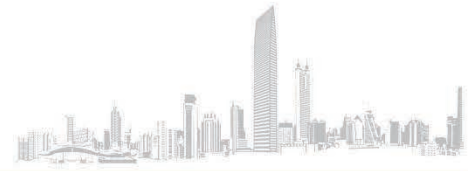
1. The version is updated to 01.08.2024, and the original version is 01.02.2023.
2. The extractable components requirements in point III.5 are deleted.
3. The test method for VOM in Note 16 has been updated from the 2022 version to the 2023 version (the new version only adds the example of silicone that contacts the mucous membrane in the principle: such as pacifiers); at the same time, it has been added that products that are not resistant to high temperatures should be tested according to the temperature/time conditions specified in Table 3 of Annex V to (EU) 10/2011, and the pretreatment of samples should be carried out in accordance with the method specified in the 61st Communication of Bundesgesundheitsblatt 46 (2003) 362.

XXXVI Food contact papers, XXXVI/1 Cooking papers and thermal filter papers, XXXVI/2 Baking papers

1. The versions of all three recommendations have been updated to 01.08.2024, with the previous version being 01.02.2023.
2. The requirements for production aids, specialized paper refining agents, and dehydration promoters in paper products have been updated. Notably, the requirements for phthalates in recycled paper have been updated as follows:

01.02.2023 Old version	01.08.2024 New version
DEHP≤1.5 mg/kg	DEHP≤0.6 mg/kg
DBP≤0.3 mg/kg	DBP≤0.12 mg/kg
DIBP≤0.3 mg/kg	DIBP≤0.15 mg/kg





DBP+DIBP≤0.3 mg/kg	DBP x 5 + DIBP x 4 + DEHP x 1≤0.6 mg/kg
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LI. Temperature Resistant Polymer Coating Systems for Frying, Cooking and Baking Utensils

Modify some requirements

1. The version is updated to 01.08.2024, and the original version is 01.04.2022.
2. The title of Article 3.1 is updated from "Specific Migration" to "Specific migration and determination of overall migration".
3. The original test conditions are replaced by the JRC technical report "Testing conditions for kitchenware articles in contact with foodstuffs: plastics metals, silicone & rubber, paper & board" (JRC134290: 2023 4th Edition). However, if the test conditions of FPU/H4 items (bakeware and ovenware items used more than 1 hour) in the JRC technical report are selected, the test conditions need to be changed from "8 h, 100°C or reflux" to "4h, 100°C or reflux".

New requirements

1. The food simulants used should be selected based on current scientific knowledge and reflect the worst case of actual use, while also considering the physicochemical properties of the analyte.
2. If modified polyphenylene ether (MPPO) is used as a simulant for specific migration, it is tested in accordance with DIN EN 14338 at 2h, 175°C.
3. The test for element release is carried out in accordance with the latest version of the EDQM technical guide for metals and alloys.
4. The total migration is tested under the following conditions and judged by the third migration result: 95% ethanol, 6h, 60°C; isooctane, 4h, 60°C.

HCT SOLUTION

Since the above updated recommendation does not set a transition period, and the requirements in the recommendation will be used by German officials as a basis for regulating the safety of food contact materials, it is recommended that relevant companies complete the material investigation and switch as soon as possible to ensure that the products are legal and compliant.

