

Food Contact Migration Compliance

Currently there are a limited number of FCMs (materials and articles intended to come into contact with food) which are regulated by harmonised EU legislation. To support the harmonised legislation for plastic FCMs, the EU Commission has published Guidelines for Migration Testing - In the framework of Regulation (EU) No 10/2011 on plastic food contact materials. These guidelines are not necessarily appropriate for those sectors which are not plastics, as these guidelines have been designed for plastic FCMs. To this end, associations representing most of these non-plastic sectors, have prepared guidelines for their sector explaining why and which of conditions in 10/2011 are inappropriate for their FCMs.

This guidance document of CES Silicone Europe for silicone elastomers is part of the package of non-plastic food contact materials prepared by different industry associations for their specific materials. Please note that this guideline is provisional and is being discussed with several Member States. It may be revised depending on the input received during these discussions.

This cross-sector industry's initiative is supported by this Parliamentary statement:

'As a general trend, stakeholders who are in favour of further EU level harmonisation recommend that EU specific measures should establish a single standard for analytical (testing) methods, such as composition determination, migration testing, risk assessment, but also specific methods for compliance enforcement, thus ensuring that the relevant FCM is tested by companies and competent authorities across the EU with one and the same method. Furthermore, the EU single standard for analytical (testing) methods should be specific for each FCM, thus reflecting its unique properties and avoiding situations where non-harmonised FCMs are tested with methods developed for harmonised FCMs, which could lead to misleading and debatable test results'.

Annex 1: Associations & Bodies participating in Initiative

- ACE The Alliance for Beverage Cartons and the Environment
- www.ace.be/ - Beverage cartons – paper, plastics and aluminium flexible packaging
- APEAL The Association of European Producers of Steel for Packaging -
www.apeal.org/ - rigid metal packaging
- CEFIC-FCA Food Contact Additives sector group of CEFIC -
<http://www.cefic.org/FCA> - substance suppliers
- CELIEGE European Cork Federation – www.celiege.eu/ - cork
- CEPE- Can Coatings Sector Paints, printing inks and artists' colours in Europe -
www.cepe.org/ rigid metal packaging
- CEPI The Confederation of European Paper Industries -
www.cepi.org/ - paper and paper board
- CES Silicones Europe Silicones Europe - www.silicones.eu/ - silicone
elastomers for household articles
- EAA The European Aluminium Association -
<http://www.aluplanet.com/eng/eea.asp> - aluminium
- EEA The European Enamel Authority - [www.european-
enamel-authority.org/en/home](http://www.european-enamel-authority.org/en/home) - porcelain enamel and porcelain enamelled articles
- EMPAC European Metal Packaging - www.empac.eu/ rigid metal
packaging
- ETRMA European Tyre and Rubber Manufacturing Association -
www.etrma.org - rubbers
- EuPIA European Printing Ink Association -
<http://www.eupia.org/> inks
- EWF European Wax federation – *contact EWF by e- mail*
contact@ewf.org -waxes
- FEC Federation of the European cutlery, flatware, holloware
and cookware industries – *contact FEC by e-mail : fecassociation@outlook.com* – non-
stick treatments and coatings, materials and articles
- FEFCO European Corrugated Packaging Association - www.fefco.org/ -
carton board

- FEICA FEICA, the Association of the European Adhesive & Sealant Industry,- <http://www.feica.eu/> adhesives
- FPE Flexible Packaging Europe - www.flexpack-europe.org/ - flexible packaging (non-plastic and multi-material)
- GAE Glass Alliance Europe - <http://www.glassallianceeurope.eu/> - glass articles, hollow, domestic and flat glass