

BRUSSELS, 17 OCTOBER 2016

## **GLASS PACKAGING FOR FOOD CONTACT: ONE SET OF HARMONIZED TESTING METHODS**

In its Report on the implementation of EU food contact material legislation, the European Parliament makes a clear request to the European Commission to make use of all the available resources at its disposal to put forward harmonised legislation for the remaining 13 food contact materials not yet regulated at EU level.

The European container glass industry welcomes this initiative of the Parliament and calls upon the European Commission to develop harmonised legislation for glass packaging materials intended for food contact.

### **A CHALLENGE TO THE INTERNAL MARKET**

Some EU Member States have developed or intend to develop specific legislation requirements that cover the use of glass as a food contact material. As there is so far no specific EU-harmonized legislation for glass packaging, the complexity and variation in the legislation will increase compliance costs for the producers of glass containers. It will also hinder the free movement of packaged goods in the EU and may lead to potentially differential costs on glass packaging manufacturers depending on their country of origin.

In its report, the European Parliament calls on Member States to require that all food contact materials, whether harmonized or not, be accompanied by a Declaration of Compliance (DoC) and the appropriate documentation as is currently required for harmonized FCMs. This further underscores the need for harmonised EU legislation, without which manufacturers will be facing different requirements in terms of production surveillance, product testing procedures, certificates of compliance requirements, and different interpretations on what is required for a material to be “safe” for food contact.

Furthermore, to ensure a level playing field between EU and non-EU products, equivalent controls are also necessary for glass imported into the EU that is either intended for food contact or already in contact with food. Imported glass packaging must meet the same criteria as glass packaging developed and manufactured in the EU. Specific EU legislation on glass would bring clarity on the market and enable fairer market controls for all glass packaging intended for food contact.

### **WHY SPECIFIC TESTING METHODS FOR GLASS PACKAGING ARE NEEDED**

There is a need for customers of the container glass industry, mainly fillers or importers of food products, to demonstrate their glass containers are suitable for food contact. In the

absence of clearly defined EU regulations, some customers are requesting glass container producers to conduct multiple tests to meet the specific requirements of different Member States. In some instances, glass articles are even being tested according to regulatory test protocols developed for other types of food contact materials (e.g. plastics or ceramics), even though these test protocols are not intended or appropriate for glass containers because they require testing of elements that simply do not exist in glass.

#### CHARACTERISTICS OF GLASS PACKAGING AS FOOD CONTACT MATERIAL

- **Soda-lime glass is effectively inert in food contact:** there is virtually no migration of (potentially dangerous) substances from soda-lime glass to the food which ensures human health protection;
- **Soda-lime glass is impermeable to both gases and liquids:** for example gases like oxygen or carbon dioxide cannot leave or penetrate through the soda-lime glass, which ensures preservation of the organoleptic properties and taste of the food;
- **Soda-lime glass is permanent:** it can be endlessly recycled, and once recycled does not lose any of its intrinsic food safety, chemical or physical properties.

#### CALL FOR ACTION

In the context of the European Commission's Roadmap on reviewing the food contact material legislation,<sup>1</sup> the European container glass industry is calling for harmonized food contact legislation for glass packaging materials. The European Directorate for Quality of Medicine (EDQM) of the Council of Europe already started to work on harmonized rules for glass as food contact material. The considerable work carried out by the EDQM is an excellent basis for the Commission to quickly come forward with specific legislation.

Furthermore, and in line with EFSA's published opinion, FEVE recommends that the evaluation of materials for food contact application should focus on the testing of finished food contact materials and/or articles and the manufacturing process used, rather than concentrating on the substances used to produce the food contact material.

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<sup>1</sup> Commission Roadmap : [http://ec.europa.eu/smart-regulation/impact/planned\\_ia/docs/2014\\_sanco\\_005\\_fcm\\_specific\\_provisions\\_for\\_materials\\_other\\_than\\_plastics\\_en.pdf](http://ec.europa.eu/smart-regulation/impact/planned_ia/docs/2014_sanco_005_fcm_specific_provisions_for_materials_other_than_plastics_en.pdf)

## ABOUT FEVE

FEVE, the European Container Glass Federation, is the association of European manufacturers of glass packaging containers and machine-made glass tableware. Founded in 1977 and headquartered in Brussels, FEVE is an international not-for-profit association, which currently numbers over 60 company members and 22 corporate groups across the European Union, Switzerland and Turkey.

The federation represents the glass container industry at an international and European level, serving as a forum for examining common questions. FEVE maintains a dialogue with the European institutions and agencies on environmental, trade and other important issues relevant to the industry. The federation promotes glass packaging and glass recycling, complementing the activities of the glass industry at a national level.

The capital intensive container glass sector is a fundamental part of Europe's packaging sector and has a longstanding contribution to Europe's heritage. Annually, it invests up to €610 million to innovate and maintain a network for 162 plants across the EU. The industry contributes €9.5 billion yearly to the EU GDP, and has a positive impact on Europe's trade balance of €21 billion for products primarily packed in glass. Some 125,000 direct and indirect jobs are maintained by the sector supporting a wide range of other industries in local regions.

In the past 15 years, EU consumption of products packed in glass increased by 39%, and glass recycling massively increased by 139%.