



# Recycled Paper

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# EU & recycled paper

- EU situation
- German guidelines
- French guidelines
- Council of Europe guidelines
- Conclusions

# Legislative status in EU

- No harmonized legislation on paper and recycling of paper exists in the EU
- Framework Regulation does apply => final article must be safe
- Safety can be demonstrated using guidance documents or other legislation (FDA)

# Situation in member states

- Some countries do not have legislation on paper and the use of recycled paper (example UK)
- Some countries do have legislation on paper and allow the use recycled paper without additional legislation (example NL)
- Some countries do have guidelines specific to recycled paper (example France and Germany)

# Germany

- BfR guidelines on paper (chapter XXXVI)
- Recycled paper may be used for production of food contact paper.
- Final article must comply with BfR guidelines
- Restrictions on the input of the recycling process are mentioned. The restrictions depend on the food type that will be in contact with the paper.
- The transfer of diisopropylnaphthalene (DIPN) should be avoided. Migration can be expected to foodstuffs with free fat on the surface or with a large surface/volume ratio. DIPN is used as a solvent in carbonless copy paper.

# France

- Documentation demonstrating safety must be made available to authorities on request
- Guidelines issued on demonstrating safety:
  - Does cover household kitchen paper and table napkins
  - Recycled materials can be used if they meet the relevant GMP requirements for the manufacturing food contact paper
  - Purity criteria depending on food type (dry foods, aqueous or fatty foods, cooking, and hot filtering)
  - Some components are subject to a residual limit or a specific migration limit

# France, example

Excerpt from the French guidelines on establishing the safety of recycling of paper

		Purity requirements	Acceptability limits
Dry foods		Transfer of antimicrobial agents	Absence of inhibition zone
		Organoleptic inertia	Absence of alteration in taste or smell of foods
		PCP content	$\leq 0.1$ mg/kg of paper
		PCB content	$\leq 2$ mg/kg of paper
		Dosing of additive based on Formaldehyde, glyoxal or others.	Formaldehyde $\leq 1$ mg/dm <sup>2</sup> Glyoxal $\leq 1.5$ mg/dm <sup>2</sup> Others: maximum doses of use conform to the Guide to Good Practices

# Council of Europe (CoE)

- CoE is an intergovernmental body of EU and non-EU countries
- CoE has issued a resolution regarding paper intended to come into contact with food (Res 2002/1)
- Technical document No. 3 deals with the use of recycled fibers
- Non-binding paper

# CoE, recycling paper basics

- Safety assurance should take into consideration:
  - Source of recovered paper
  - Technology used to remove contaminants
  - Intended use of the paper
- GMP is required

# CoE, recovered paper sources

Group 1	Food contact paper
Group 2	Non-food contact paper, with little contamination Example: white paper from offices
Group 3	Non-food contact paper, with little contamination Example: corrugated board, unsorted white and colored printing paper from offices
Unsuitable sources	Heavily contaminated paper Example: old archives (PCBs), used hygienic paper

# CoE, food types classification

Type I	<b>Aqueous and/or fatty food types</b> Examples: beverages, fresh fish, pizzas, applications above room temperature (oven, microwave)
Type II	<b>Dry, non-fatty food types</b> Examples: bread, sugar, tea, spices
Type III	<b>Foodstuffs which are shelled or peeled or washed</b> Examples: fruits, nuts, vegetables

# CoE, decontamination processes

- Mechanical cleaning, by using repulping, deflaking
- Washing
- De-inking by washing or flotation
- Thermal treatment
- Chemical treatment, example bleaching

# CoE, guidance

Depending on which food type and paper group guidance is provided on:

- which contaminants must be determined
- migration limit for contaminants
- which decontamination process must be used

# CoE, example

Excerpt from the CoE technical document No. 3 to the (2002)1

Food type (Chapter 4)	Recovered paper group (Chapter 3)	Process technologies (Chapter 5) (other processes or combinations of processes may be used provided that the end-product fulfils the requirements of Chapter 6)	Additional end-product requirements (Chapter 6) (tests should be carried out for other toxic substances whenever there are grounds to suspect their presence in the end-product)
Food type I Aqueous and/or fatty foodstuffs (including defrosted)	Group 1: Paper and board manufactured with substances listed in Technical document No. 1	Mechanical cleaning	The requirements of Table 2 of the Guidelines do not apply
	Group 2: Paper and board manufactured with substances not listed in Technical document No. 1, unprinted or lightly printed or lightly coloured	Mechanical cleaning Washing Chemical treatment, unless it is not necessary Thermal treatment, unless it is not necessary	Michler's ketone, DEAB, DIPNs, HTTP, Phthalates, Solvents, Azo colourants, FWAs, Aromatic amines, Polycyclic aromatic hydro-carbons, Benzophenone

# EU conclusions

- No EU harmonized legislation exists for recycled paper
- Recycled paper must comply with Framework Regulation
- Guidelines do exist on national level and are also provided by the Council of Europe
- Requirements in guidelines depend on recycled paper source, decontamination process(es) and food contact application.



# Thank you!

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