the plastics industry trade association

August 4, 2016

Food Standards Australia New Zealand
PO Box 7186
Canberra BC ACT 2610
Australia

Re: Proposal P1034 - Chemical Migration from Packaging into Food

Dear Sir or Madam:

The Society of the Plastics Industry, Inc. (SPI), through its Food, Drug, and Cosmetic Packaging Materials Committee (FDCPMC), hereby respectfully submits comments to Food Standards Australia New Zealand (FSANZ) on Proposal P1034 on chemical migration from packaging into food.[1,2] SPI previously furnished FSANZ with comments regarding Proposal P1034 on December 23, 2014 in response to the Agency's publication of its Consultation Paper for Proposal P1034. We appreciate the opportunity now to comment on the Risk Assessment for Proposal P1034, published on June 10, 2016.

The purpose of our comments is to assist FSANZ with determining the need for measures to manage potential risks resulting from the migration of chemical contaminants to packaged food. Specifically, we hope to explain the value in FSANZ's adoption of a basic standard to ensure the safety of materials used in contact with food. We believe a sound approach would be to adopt a system that would ensure compliance by relying upon the standards already developed and used by many countries as evidence of safety. Specifically, we believe a demonstration of compliance with the requirements for food-contact materials in the United States (U.S.) or the European Union (EU) would not require an enormous regulatory burden, but would set a basis of safety for food-contact materials. In addition, we have specifically considered the twenty (20) questions posed to industry in the Risk Assessment and provide our responses in Section III (below).

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[1] The proposal and supporting documentation are available at http://www.foodstandards.gov.au/code/proposals/Pages/P1034ChemicalMigrationfromPackagingintoFood.aspx.

[2] Founded in 1937, The Society of the Plastics Industry, Inc., is the trade association representing one of the largest manufacturing industries in the United States. SPI's members represent the entire plastics industry supply chain, including processors, machinery and equipment manufacturers, and raw material suppliers. The U.S. plastics industry employs nearly one million workers and provides more than $427 billion in annual shipments, both foreign and domestic. U.S. plastics manufacturers export food packaging materials worldwide, including to Australia and New Zealand, and have a strong interest in ensuring that all materials used in contact with food are safe and suitable for their intended use.

I. FDCPMC Background

The FDCPMC is composed of SPI members with particular interest and expertise in packaging for food, drugs, cosmetics, and related products. SPI created the Committee to support government agencies working on food packaging regulations, and to assist members in their understanding of, and compliance with food packaging regulations. The Committee has worked cooperatively with government agencies worldwide on regulatory issues relating to packaging since its formation in 1957. For over 50 years, the FDCPMC has worked closely with the U.S. Food and Drug Administration (FDA) and the European Food Safety Authority (EFSA), and more recently with Health Canada, the Japanese National Institute of Health Sciences (NIHS), the Chinese National Center for Food Safety Risk Assessment (CFSA), and the Chinese National Health and Family Planning Commission (NHFPC), as they have worked to develop and improve the regulatory framework governing food-contact materials in their respective jurisdictions.

With respect to food safety and food packaging, the Committee's cooperative efforts with regulatory agencies focus on the shared goal of developing regulations that ensure protection of the public health while promoting market access for safe and suitable food packaging materials worldwide. The Committee has provided survey data on the use of specific plastics, conducted research, and provided practical advice on the functioning of the industry and effective product stewardship programs. We want to take this opportunity to express our continued interest and willingness in being a resource for FSANZ as the agency continues to evaluate the current regulatory scheme for food packaging in Australia and New Zealand. We would welcome further collaboration with FSANZ and other agencies and peak bodies that relate to food packaging materials as the current consultation proceeds.

II. FSANZ Risk Assessment

We understand that the current Call for Submissions requests information that will increase FSANZ's understanding of whether further measures are needed to manage risks resulting from the migration of chemical contaminants to packaged food. More specifically, the Risk Assessment for P1034 proposes a range of risk management options, and indicates that the "graduated approach" to regulating potential chemical migration to packaged food, which would use different approaches for high risk and low risk chemicals combined with programs to educate food businesses regarding control practices to implement to keep migration of food packaging components to a minimum, may offer the best balance between protection of public health and safety and cost efficiency. Our comments below specifically address the "graduated approach" and, more broadly, seek to assist FSANZ with its determination of the need for measures to manage risks resulting from the migration of chemical contaminants to packaged food. In short, we believe that, although the current safety standard for food packaging in Australia and New Zealand has proven sufficient to ensure that materials contacting food consumed in Australia and New Zealand do not present a public health or safety concern, there may be value in the adoption of a more formal system that will provide even greater health and safety protection. In this regard, we support the adoption of a standard that requires that materials used in food-contact applications in Australia and New Zealand meet the requirements for their intended use in either the U.S. or the EU. We further discuss the added value in adopting a system based on the U.S.

and EU regulatory requirements in our comments specific to each question presented in the Call for Submissions, as follows.

III. Response to Questions

A. Risk Profile

Q1 Do you consider that an ongoing monitoring and surveillance strategy, possibly by jurisdictions responsible for enforcement and compliance of food laws would be a practical measure to identify and manage unknown risks associated with chemical migration from packaging into food (CMPF)?

Currently, the law in Australia and New Zealand requires that packaging must be safe and suitable for its intended use. As discussed in our December 23, 2014 comments, we believe that the current safety standard, which is very similar to the underlying standards applied to food packaging worldwide, has been adequately protective of public health and safety in Australia and New Zealand. We further believe, however, that additional health and safety protection might be gained by the adoption of a system of compliance of food-contact materials with the requirements in place in the U.S. or the EU. The added protection that will come with the adoption of such a system would come at little cost to FSANZ to develop, as the U.S. and EU systems are comprehensive and could be easily cross-referenced in the Code. Moreover, as most packaging material is developed to meet the standards in the U.S. and the EU, there would be little disruption in the market, but a higher level of safety is ensured.

B. Analysis of Control Measures and Market Information

Q2 Do you agree that FSANZ's analysis of control measures and market information accurately represents how CMPF is being controlled in Australia and New Zealand? If, not please state your reasons?

Q3 For any industry stakeholders who have yet to respond to FSANZ's call for information: What control measures for CMPF does your business use?

In response to Question 2, we agree that FSANZ's analysis of control measures and market information accurately represents the current mechanisms for controlling chemical migration from packaging into food (CMPF) in Australia and New Zealand.

In response to Question 3, SPI – as a trade association representing food packaging manufacturers – does not itself maintain or implement control measures for food packaging. We do note, however, that our members have implemented rigorous good manufacturing practices (GMP) that meet the regulatory requirements for GMP across the globe. GMP considerations form the basis of any sound food packaging manufacturing program and fit squarely within the general safety paradigm, the standard currently in place in Australia and New Zealand. When marketing products in Australia and New Zealand, our members are compliant with U.S. or EU standards (including GMP considerations), which are generally accepted across the industry and by governments around the world as a sufficient

basis for establishing safety and suitability of a given food packaging material.[3] The purpose of GMP programs in the production of food-contact materials is to reasonably ensure that the packaging product will not adulterate food or lead to any public health or safety concerns.

C. Risk Management – Status Quo Option

Q4 What problems can you identify with the status quo option and therefore abandoning this proposal?

We believe that the status quo approach under the current law in Australia and New Zealand is adequately protective of human health and safety because food packaging presents a very low risk to the safety of food, and, thus, to public health in general. Nevertheless, we would not object to the adoption of a more formal system to provide further protection to consumers in Australia and New Zealand. By choosing to incorporate the U.S. and EU systems formally into law in Australia and New Zealand, this additional protection will be gained at very little cost to FSANZ.

Although we encourage FSANZ to formally recognize the regulatory systems governing food-contact materials in the U.S. and the EU, we would not support the adoption of an entirely new regulatory scheme for food-contact substances that is unique to Australia and New Zealand. Such a system would prove costly to FSANZ to develop and to industry to come into compliance. These costs would not bring along with them added health and safety benefits, as the systems in place in the U.S. and the EU are comprehensive and highly protective of human health.

D. Risk Management – Prescriptive Approach Option

Q5 If you consider that a prescriptive approach is the most appropriate option as per either the U.S./and/or EU approach, FSANZ invites you to elaborate on those reasons. Specifically, please provide the pros and cons of this position in order to further identify costs and benefits for consumers, industry and government of taking a prescriptive approach?

As noted above, we recommend that FSANZ adopt a system of mandatory compliance of food-contact materials with the laws and regulations administered by the U.S. FDA or in place within the EU.[4] Both the FDA and EU regulatory systems are comprehensive, accepted in global commerce, and able to keep pace with packaging innovation while protecting public health. Reliance on these existing systems would ensure that food-contact materials have been subjected to rigorous premarket review,

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[3] *See e.g.,* Australian Standard (AS) 2070-1999. This non-binding standard explicitly states that new plastic materials must comply with the food-contact regulations for plastics in the United States or Europe. The standard also looks to U.S. and/or EU regulations for processing aids, additives, colorants, and coatings. Clearly, Standards Australia considers the food-contact regulations in those two jurisdictions to be appropriate for establishing the safety and suitability of a food packaging material.

[4] We are not proposing to require that all materials must have specific premarket approval by FDA via a listing in the food additive regulations, a Threshold of Regulation exemption, or an effective Food Contact Notification; rather, we are proposing that materials simply must have a suitable FDA status for their intended use.

without imposing new and resource-intensive procedural requirements on either industry or FSANZ. In fact, these well-established systems are so comprehensive that little can be gained in the application of an additional set of regulatory requirements that does not tie back to the U.S. and EU systems. Instead, the creation of a separate system in Australia and New Zealand would only lead to burdens on the government's resources from the creation and maintenance of a separate prescriptive system that would not add any additional protection for public health. In addition, packaging suppliers develop their products to comply with global requirements. The addition of a new regulatory scheme in Australia and New Zealand would drive changes to existing products that are currently safe and suitable for use in food-contact applications. Because these existing products are already safe, the resources expended by suppliers to change their products to align with yet another regulatory system are unnecessary.

If FSANZ agrees that the best course of action is to formally recognize the U.S. and EU regulatory systems as the basis for demonstrating safety of food-contact materials, this would create a simple, predictable, and established method for demonstrating the safety of food packaging products in Australia and New Zealand. The use of these regulatory schemes would avoid the unnecessary duplication of efforts by both industry and FSANZ to regulate materials that have already been determined to be safe by internationally recognized regulatory agencies, freeing FSANZ to focus its resources on areas involving more significant concerns for public health. Both the U.S. and EU programs are based on respected scientific principles and apply an evidence-based approach to conduct safety reviews of food-contact substances; thus, these programs can be relied upon to support the safety of food packaging used in Australia and New Zealand if FSANZ determines that further regulatory action is needed.

E. Option 3: Non-Regulatory Approaches

The Risk Assessment indicates that a non-regulatory approach to ensuring the safety of food packaging could entail the following: education (via information/awareness programs) (option 3a); and/or industry self-regulation by the available industry standards or codes of practice (option 3b) and/or industry self-regulation by a co-regulatory approach (Option 3c).

a. Option 3a: Education/Awareness/Information Programs

Under Option 3a, FSANZ proposes to initiate an information/awareness program facilitated by FSANZ, the AFGC/NZFGC, and the packaging peak bodies (NZ Packaging Council and the Packaging Council of Australia) to address specific gaps in both the knowledge and awareness regarding food packaging safety. FSANZ indicates that such a program would focus on three key areas:

- general information for consumers;
- the obligations on food businesses (particularly small-to-medium enterprises) to use safe packaging materials; and
- how a business meets those obligations in the state, territory, and New Zealand food regulations and current standards in the Code to ensure the safety of packaging materials.

Q6 What do you see as the costs/benefits of this option (*i.e.,* the non-regulatory approach) for consumers, industry and government? Do you consider it would ensure industry has adequate knowledge of the risks from CMPF and implemented available risk mitigation measures?

Q7 Focusing on the three key areas outlined above, what information do you think would be the most suitable to include in an information/awareness program?

Q8 Do you agree that FSANZ, the AFGC/NZFGC and packaging peak bodies are the most appropriate organisations to undertake this program? If not, can you identify other appropriate agencies, and peak bodies?

We believe that a non-regulatory approach involving an education/information program for industry participants with strong support from industry would be much less costly than a regulatory approach that includes a new regulatory scheme unique to Australia and New Zealand that does not simply mandate compliance with U.S. or EU requirements, as this option would allow for the efficient sharing of knowledge and resources among industry, FSANZ, the AFGC/NZFGC, and the relevant packaging peak bodies.

As in every regulated industry, there is a continuing need for education to ensure that food packaging manufacturers understand the regulations and are using the most up-to-date scientific and risk assessment techniques to establish the safety and suitability of their products. While many manufacturers are highly sophisticated in this area, opportunities for large companies to share knowledge and expertise with less sophisticated manufacturers and food companies will help all members of the industry ensure product safety and compliance with GMP. Risk assessment and risk management methodologies are constantly evolving, and it is important for packaging manufacturers of all sizes to communicate regarding the latest regulatory and scientific developments. Trade associations, including SPI, offer regular conferences and webinars that address the latest issues in food packaging, and have many resources available to companies for continuing education. We would be happy to work with FSANZ to integrate information sessions such as these into an educational program.

In response to Question 8, we agree that FSANZ, the AFGC/NZFGC and packaging peak bodies are the most appropriate organizations to lead an education/information program for industry participants, and we would be glad to assist the Agency in its efforts in this regard.

b. Option 3b: Industry Self-Regulation by Industry Standards or Codes of Practice

The Risk Assessment indicates that this option would be characterized by industry formulating rules and codes of practice (CoPs), either existing or new, and being solely responsible for their enforcement.

c. Option 3c: Industry Self-Regulation by a Co-Regulatory Approach

The Risk Assessment notes that industry, in its comments to the Consultation Paper, informed FSANZ that an industry/FSANZ co-regulatory approach would present a voluntary mechanism for adoption by businesses that wish to use it, while maintaining maximum flexibility for companies to

develop their own systems and approaches should they have the expertise and need to do so. SPI concurs that the flexibility offered by this approach would adequately protect public health and safety while also minimizing the resources expended by industry and FSANZ.

Q9 What are the perceived cost and benefits for consumers and industry of a non-regulatory approach? Do you think either option 3a, 3bor 3c would be cost effective?

As discussed above, SPI supports the adoption of compliance with the U.S. and/or EU food-contact regulations to demonstrate the safety of food packaging in Australia and New Zealand. If FSANZ feels the need to further bolster the overall regulatory framework for food packaging, however, we would support a non-regulatory approach that involves an education/information program for industry participants with strong support from industry. We believe this approach would represent a cost effective option that provides the additional health and safety protection. As noted in our response to Question 8, we would be delighted to assist the Agency in such efforts.

F. Graduated Approach

The Risk Assessment notes that a "graduated approach" to regulating potential chemical migration to packaged food may offer the most protection of public health and safety and cost effectiveness.

1. Guideline Approach

Under this approach, government and industry would work together to publish non-binding industry guidance. This Risk Assessment indicates that the guidance could include the following information:

- a description of the regulatory requirements relating to managing the public health risk from the migration of chemicals from packaging into food;
- identifying where the responsibility lies for ensuring chemical migration risks are managed;
- steps industry might take to demonstrate compliance with the regulatory requirements;
- referencing overseas standards as a means of industry demonstrating that packaging used is safe and suitable;
- processes for assessing the safety of unknown packaging chemicals that may not have previously been found in food in Australia or New Zealand; and
- agreed enforcement strategies which will be pursued by the jurisdictions.

Q10	A guideline would involve a degree of prescription[5] (*although it would not be mandated in the Code*). FSANZ invites stakeholders to identify the costs and benefits to industry, consumers and government of this approach in assisting industry (specifically SMEs) with identifying, characterising and managing risks arising from CMPF.
Q11	Would the information [outlined in section 2.3.4.1 of the Risk Assessment] be appropriate for including in a guideline or can you identify others that should be included?
Q12	Should all the industry standards and CoPs identified in option 3b be included in a guideline under this current Proposal (versus a separate process) to maximise coverage of all requirements for packaging or only specific ones that include reference to food safety measures or prescribed limits in them? In your answer please be as specific as possible to identify the most-appropriate guideline that would address CMPF.

Although SPI believes that mandatory compliance with the U.S. or EU food-contact regulations is the best path to ensuring the safety of food-contact materials in Australia and New Zealand, if FSANZ decides to take a graduated approach to the regulation of food packaging, we would be glad to work with FSANZ to develop guidance that is specifically tailored to the market in Australia and New Zealand. In our opinion, such a document should coincide with the regulatory frameworks in place in the U.S. and EU governing food-contact materials.

Standards Australia, a non-governmental organization, currently administers non-binding regulations concerning plastic materials intended for use in food packaging applications, *see e.g.*, Australian Standard (AS) 2070-1999.[6] We understand that AS 2070-1999 is not part of the Code and is not binding; it is, nevertheless, widely followed in Australia. We would envision that any potential, non-binding food packaging guidance issued as part of a graduated approach to regulation of CMPF would similarly be followed widely by industry in both Australia and New Zealand. Thus, this approach would likely lead to uniform practices adopted by industry at a relatively low cost to industry and FSANZ.

We agree that if guidelines are introduced they will require clarity around the party within a given supply chain that has responsibility for the compliance of the materials used in the packaging of foods (*i.e.*, packaging manufacturers, suppliers and/or food manufacturers, importers, or retailers). We also agree that any such guidance document should allow flexibility for the use of different types of food-contact materials that have varying levels of contact with food, *i.e.*, long-term retail food storage packaging versus quick service restaurant products.

With respect to the information that should be included in a potential industry guidance document, we believe that the list of information outlined in section 2.3.4.1 of the Risk Assessment is sufficiently comprehensive, and would not lead to a substantial burden on industry or the Agency.

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[5] The OBPR has advised FSANZ that it also views guidelines as a prescriptive measure.

[6] These Australian Standards are prepared by Technical Committees comprised of stakeholders.

FSANZ has also requested feedback on whether the industry standards and CoPs identified in option 3b (under the non-regulatory approach) should be included in guidance under the graduated approach to regulation versus an altogether separate process. To streamline the manner in which food packaging materials would be regulated under any potential non-binding guidance, we would recommend including all the industry standards and CoPs identified in option 3b (under the non-regulatory approach) in the guidance. This approach would allow the guidance document to serve as a single, comprehensive resource for industry and would avoid any potential oversights by industry in understanding the key regulatory considerations applicable to their businesses.

2. Graduated Approach – Strengthening the Requirements in the Code

The Risk Assessment notes that some comments on the Consultation Paper indicated that the requirements in the Code do not provide businesses with adequate information or direction to ensure that they only use packaging materials that are safe. In response, FSANZ indicates that it may amend the relevant standards in the Code to require food businesses to ensure (*i.e.,* through certification) that the food packaging that they purchase and use has been made under GMP and meets specific standards in place internationally (*i.e.,* EU, U.S., or other regulations).

Q13	What do you see as costs and benefits for government, consumers and industry of this measure? Would it be cost effective? Please detail any other options that you think are appropriate, or available, to strengthen or clarify existing Code requirements and the reasons why, including the costs and benefits of such a measure?
Q14	Do you consider that there is scope to improve the Food Acts provisions regulating the sale of food packaging in Australia and New Zealand?

We believe that amending the Code to require mandatory compliance with the food-contact requirements in the U.S. or the EU will adequately protect public health and safety, and additional revisions to the Code are unnecessary. Specifically, compliance with the requirements of the U.S. or EU ensures that the food packaging has been made under GMP and meets the specific standards set forth in the U.S. or the EU.

G. Regulatory Approach - Chemicals of Concern or High Risk (regulatory approach)

Q15	Do you consider that the Code should include specific limits for DEHP and DINP for all foods similar to the limits set used for other packaging chemicals (tin, vinyl chloride and acrylonitrile). What do you see as the costs and benefits to industry, enforcement agencies and consumers of this approach?

Although the toxicity of certain phthalates, including di(2-ethylhexyl)phthalate (DEHP) and diisononyl phthalate (DINP), continues to be a topic of conversation among regulatory bodies, we are aware that both DEHP and DINP are safely used in certain food packaging applications without

concern.[7] Specifically, we understand that DEHP and DINP are not expected to migrate to non-fatty foods. The limitations placed on the use of these substances in the EU, for example, indicate that no concern is noted when the substances are used as plasticizers in materials intended for repeated-use applications and/or materials intended to contact non-fatty foods.[8] In addition, we understand that Australia's National Industrial Chemicals Notification and Assessment Scheme (NICNAS) has reviewed DINP and concluded that it may be safely used in toys and child care articles. In light of the safety concerns surrounding these substances, we would recommend adopting the current EU limitations on the use of DEHP and DINP.[9]

We also want take this opportunity to note that, although the purpose of the document is not to comment on the 24th Australian Total Diet study (ATDS), it is important to highlight that some of the estimations are highly conservative. For example, the studies relied upon appear to be based on biomonitoring and other indirect methodologies, and we note that direct methods of estimating exposure to DINP and DEHP are more realistic and also lead to significantly lower estimates than do the estimates based on indirect methods.[10] For these reasons, we encourage FSANZ to undertake a follow-up survey to more accurately estimate dietary exposures for use in assessing potential health and safety risks.

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[7] Regulation (EU) No. 10/2011, as amended ("the Plastics Regulation"), permits the use of DINP and DEHP as technical support agents in addition to their more common use as plasticizers.

[8] Under Regulation (EU) No. 10/2011, as amended ("the Plastics Regulation"), DINP may be used only in plastic materials and articles intended for repeated-use applications or in single-use applications involving contact with non-fatty foods. A specific migration limit (SML) of 9 mg/kg applies. DEHP may be used only in repeated-use materials in contact with non-fatty foods. An SML of 1.5 mg/kg applies.

[9] Although we do support adoption of the limitations placed on the use of DEHP and DINP in the EU, we do not support wholesale adoption of the EU model without simultaneously adopting the U.S. FDA model as well. We believe that determining compliance based on a suitable status in the U.S. or the EU provides sufficient public health protection while also giving industry the greatest level of flexibility in marketing materials for food-contact applications in Australia and New Zealand.

[10] We are happy to provide additional details on this comparison if this is of interest to you.

H. Post-Market Surveillance

Q16 Which peak bodies should be involved in familiarising industry with any new provisions or raising awareness of CMPF?

Q17 How could post-market surveillance be conducted satisfactorily? Who would undertake such surveillance?

Because Standards Australia currently administers nonbinding guidance for packaging, we believe that Standards Australia is well-positioned to serve as the lead organization for any potential education or information program for industry participants. We would be glad to assist Standards Australia (or another designated peak organization) with such efforts.

With respect to post-market surveillance, we continue to assert that Australia and New Zealand should adhere to generally accepted norms for compliance in the U.S. and the EU. In these jurisdictions, regulated entities make every effort to ensure that their food packaging materials are safe and suitable for the intended use prior to market, making post-market surveillance a secondary mechanism to ensure safety. Indeed, manufacturers of food packaging carefully design their products to prevent the transfer of substances in the packaging to food. It is also worth noting that it is not desirable to produce packaging from which substances could migrate at high levels, as this could cause off-flavors or odors in the food which could, in turn, make the food unpalatable to the consumer. Thus, legal and marketing forces work together to ensure that food packaging manufacturers produce safe products that do nothing more than serve their intended function to protect food from spoilage, tampering, and waste.

We believe this paradigm should also apply in Australia and New Zealand. This approach places less of a burden on government resources and places the onus on regulated industry to ensure the safety and effectiveness of their products before they are marketed for food-contact applications.

I. Additional Risk Management Questions

In order to help prepare a future regulatory impact statement (RIS) (if required), please consider the following general questions:

Q18 How will the options listed affect you; such as the choices available to your business and current process practices, consumption choices or regulatory activities?

Q 19 Are there other affected parties that have not been identified by FSANZ that you feel should be included?

Q 20 Are there specific costs or benefits to consumers, industry and/or government that you feel should be considered in a future Regulation Impact Statement? If you have any data or information to support your views on these questions, FSANZ would welcome the opportunity to consider it.

As discussed throughout this document, we believe that the current safety standard in Australia and New Zealand has been sufficiently protective of public health and safety, but we would recommend

adopting a system wherein compliance is demonstrated based on the suitable status of a food-contact material in the U.S. or the EU. Consistent with this recommendation, we request that in any regulatory action FSANZ may take, FSANZ should simply mandate that any plastic material or article used to package food sold in Australia or New Zealand should comply with the laws and regulations administered by the U.S. FDA or in the EU. We would also support a graduated approach to regulation whereby industry and a peak organization work together to develop non-binding industry guidance and, in this regard, SPI would be glad to serve as a key resource.

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We appreciate the opportunity to submit comments on the Risk Assessment for Proposal P1034, and trust that FSANZ will continue to engage stakeholders in the consultation process. If you should have any questions regarding our comments, or if we can provide you with any additional information regarding the regulation of food packaging materials in the U.S. or EU, or even in other jurisdictions, please do not hesitate to contact us.

Sincerely yours,

[redacted]

[redacted]
Senior Director, Global Regulatory Affairs
Society of the Plastics Industry, Inc.
[redacted]