



Klabin

ICCA Work Group Food Contact / Good Manufacturing Practices

José Taragano
Klabin S.A.

Throughout the world, issues surrounding the health and safety impact of packaging that comes into direct contact with food are being discussed, legislated and regulated. Different regions of the world are experiencing these changing trends in different ways and at different rates.

Group Focus



This group strives to share information and ideas, and to help provide input where possible to help assure that new practices will not negatively impact the corrugated business.



Group Members



Chairman

Mr. Miguel Sampol Pou - Klabin S.A.

Chief Executive Officer

Members

Mr. Bob Ford - Arvco Container

Representing: Association of Independent
Corrugated Converters (North America)

Mr. Yasuo Ochi - Rengo Company Limited

General Manager, Overseas Business Department

Mr. Henk Nieuwbeerta

Smurfit Kappa Group

Mr. Brian O'Banion - Fibre Box Association

Vice President

Ms. Gabriella Michelucci

Klabin S.A.

Mr. Nat Pinitpongskul - Thai Containers

Group Co., Ltd - Marketing Division Manager



Food Contact Work Group

15 Discussion Topics



The FC/GMP Group prepared a questionnaire that was answered by Region.

1. Discussions and surveys for FC/GMP issue
2. Certification on GMP
3. Impact of GMP on investment, operating costs and competitiveness
4. GMP law and regulation - main provisions
5. FC law and regulation - main provisions
6. Recommendation on GMP issued by private entities/associations
7. Recommendation on FC issued by private entities/associations
8. Industries/Users of corrugated boxes demanding auditing on GMP practices



Food Contact Work Group

15 Discussion Topics



The FC/GMP Group prepared a questionnaire that was answered by Region.

9. Customers' ways to monitor adherence to FC/GMP practices
10. The position of Retail Business regarding FC/GMP demands
11. Final consumer perception on food safety - dependence/reliance on packaging
12. Adoption of GMP standards by corrugated boxes producers
13. Traceability process applied by corrugated boxes producers - complete supply chain upstream and downstream
14. Demands and restrictions on papers (liners and flutings) regarding FC
15. Adoption of recall practice by the corrugated industry



Regional situation a brief summary



Europe

- Discussions began in early 90's
- GMP implementation based on FEFCO or BRC/loP Standard
- Regulation on GMP issued in 2004
- The European Normalization Institute Hygiene Standard for packaging should be concluded by the end of 2007
- Increasing demand for GMP Certification by food producers
- GMP positive effects on other operational standards and competitiveness with no substantial investment
- EU Regulation 2023/2006 on GMP
- EU Regulation 1935/2004 on FC
- GMP recommendations by FEFCO, BRC/loP and CEN
- The traceability concept is based on the notion that in case of a serious problem a recall can be executed.



Regional situation a brief summary



Japan

- Voluntary standards on safety of paper and paperboard – Japan Paper Association in conjunction with the Ministry of Health, Labor and Welfare and the National Institute of Health Sciences - should come into effect by the end of 2007
- Food Sanitation Law governs toxic and hazardous substances found in containers and packaging
- GMP adoption may increase operational cost but also enhance competitive strength
- GMP regulated by the Ministry of Health and Welfare
- Details of GMP are based on ISO13485/2003
- Food Sanitation Law applicable to FC
- GMP recommendations by the Japanese Institute for Health Food Standards
- Voluntary control for FC – Japan Printing Ink Association and Japan Association of Milk Packaging and Machinery
- Adoption of traceability process



Regional situation a brief summary



USA

- FDA regulates food safety and GMP
- Regulations typically focused on the food manufacture, not the packaging supplier
- Many corrugated facilities are GMP certified according to the American Institute of Baking criteria
- GMP certification demanded by most food manufacturers
- FDA requirements for GMP plan
- FDA regulations on FC contaminants
- Customers sometimes audit plants regarding FC/GMP
- Individual traceability systems adopted by each corrugated manufacturer



Regional situation a brief summary



Brazil

- Discussions on FC/GMP began in late 90's following European and American legislations
- Not many food producers asking so far for GMP certification
- Some corrugated manufacturers are concerned with GMP related investments
- Ordinance 177/1999 applicable to FC
- No private entities/associations issuing FC/GMP recommendations yet
- Pharmaceutical industry demanding audit on GMP practices
- Corrugated manufacturers are considering adopting GMP standards
- Individual traceability systems adopted by each corrugated manufacturer



Group Recommendations



- **ICCA should gather, consolidate and make available for corrugated associations and companies worldwide as much information as possible on FC/GMP issues.**

- **We should take advantage from FEFCO's extensive analysis on:**
 - the difference between horizontal standards that are difficult to work with in a sector and sector specific vertical standards
 - the ISA International Good Manufacturing Practices Standard
 - the Traceability System issue

- **Promoting a FC/GMP standard on a worldwide scale should be our goal.**

- **Detailed regional responses to Food Contact Questions are available at:**
http://www.iccanet.org/Members/WorkGroups/Attachments/UserID_4462/Post_34/Food Contact Work Group - coordinators.pdf



Thank you !