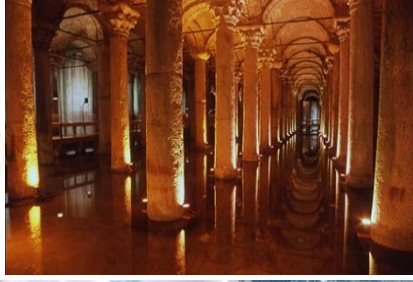




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ORMAN BAKANLIĞI



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TÜRKİYE CUMHURİYETİNİN YÜZÜNCÜ YILI



# REPUBLIC OF TÜRKİYE



#ÜretimünÜreticininYüzyılı



**Republic of Türkiye**  
**Ministry of Agriculture and Forestry**

**Complementarity of Turkish Food Codex Legislation  
on Food Contact Materials and Council of Europe  
Recommendations and Guidance**

**HATİCE USLU YILMAZ**  
**Food Engineer**  
**General Directorate of Food and Control**



# OUTLINE

- Who we are? (Structure and Responsibilities of the Ministry)
- Food Safety Legal Basis
- National Legislation on Food Contact Materials (Turkish Food Codex)
- International FCM Regulation
  - EU
  - Council of Europe/EDQM
- CoE/EDQM FCM Work and national perspective



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# WHO WE ARE?

MINISTRY of AGRICULTURE  
and  
FORESTRY  
(MoAF)

**Main policy:** Assurance of high level protection of human health and consumers' interest





## WHO WE ARE?

- ✓ Ministry of Agriculture and Forestry in Türkiye is the competent authority in the fields of food safety, veterinary and phytosanitary.
- ✓ General Directorate of Food and Control (GDFC) is the main central service unit of the Ministry, in charge of controlling and regulating food safety, veterinary and phytosanitary sectors.



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## GDFC & Food Safety Policy “*from FARM to FORK*”





Protection of Consumers' interest and  
Environment



Plant Health



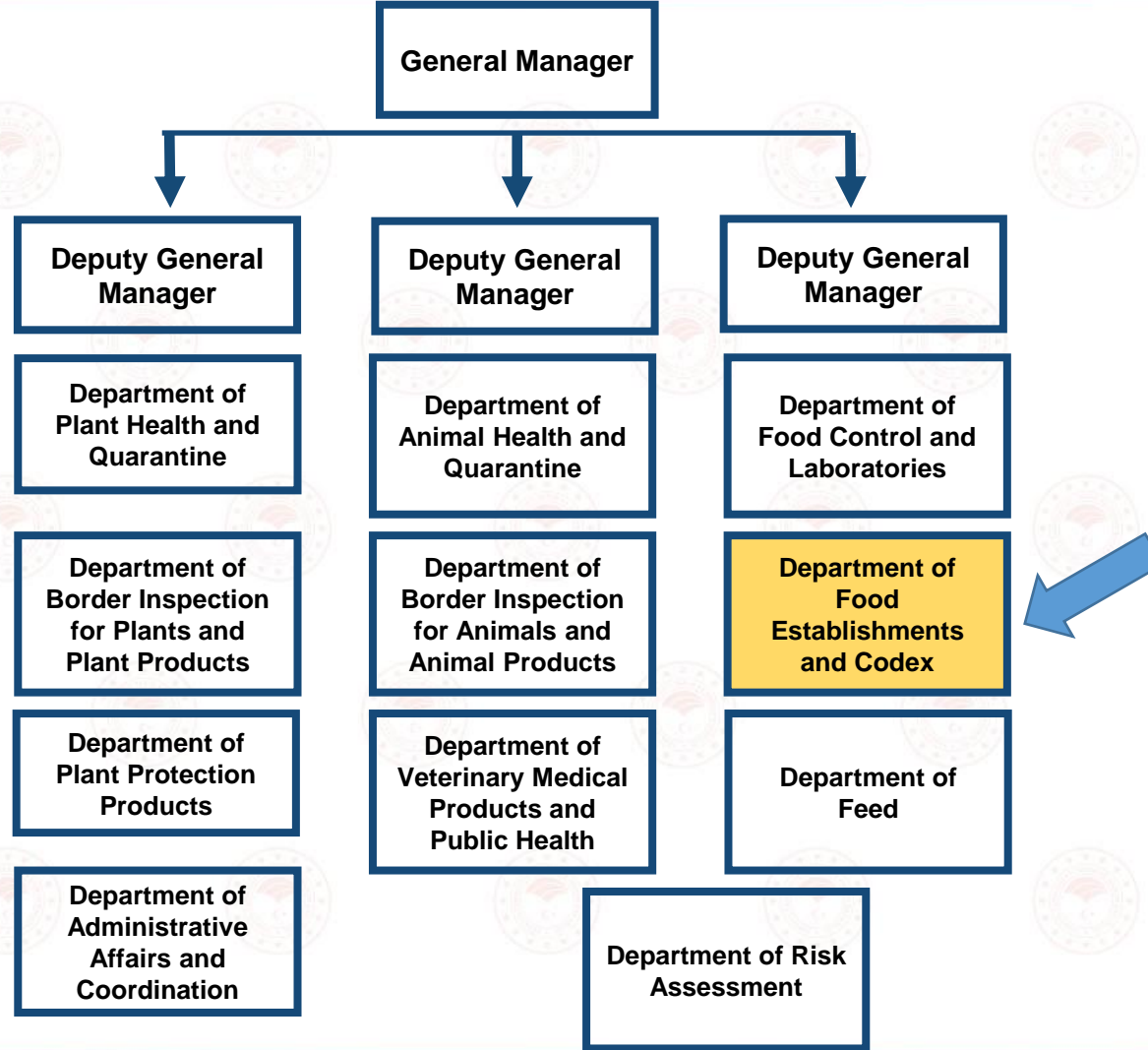
Animal Health & Welfare



Food & Feed Safety



Risk Assessment







23



DIRECTORATE OF  
VETERINARY  
BORDER  
CONTROL POINT

9



DIRECTORATE OF  
VETERINARY CONTROL  
INSTITUTE

14

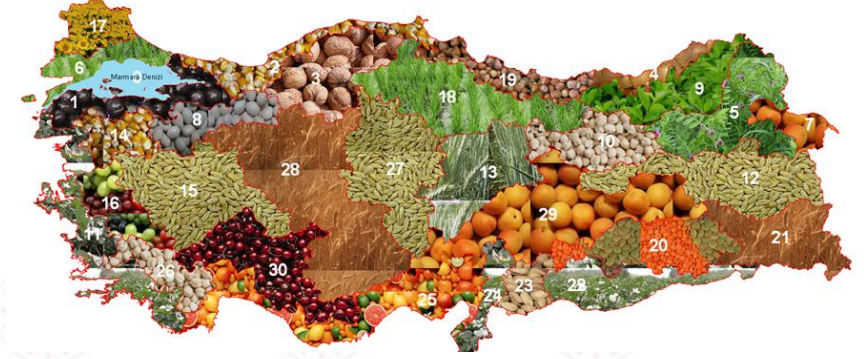


DIRECTORATE OF  
AGRICULTURAL  
QUARANTINE

41



DIRECTORATE OF FOOD  
CONTROL  
LABORATORY



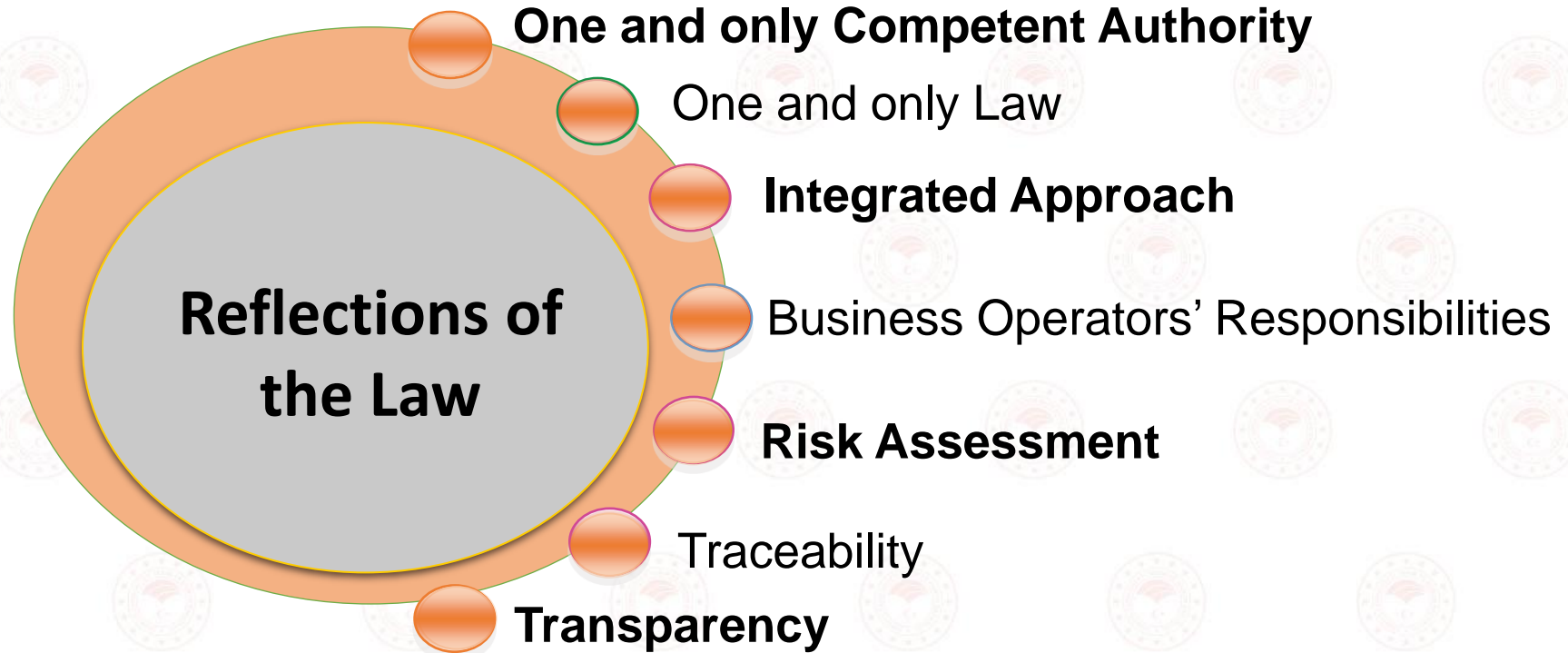
## 81 PROVINCIAL DIRECTORATES

- Animal Health and Breeding Management
- Plant Production and Plant Health Management
- The Food and Feed Management
- Fisheries and Aquaculture Management



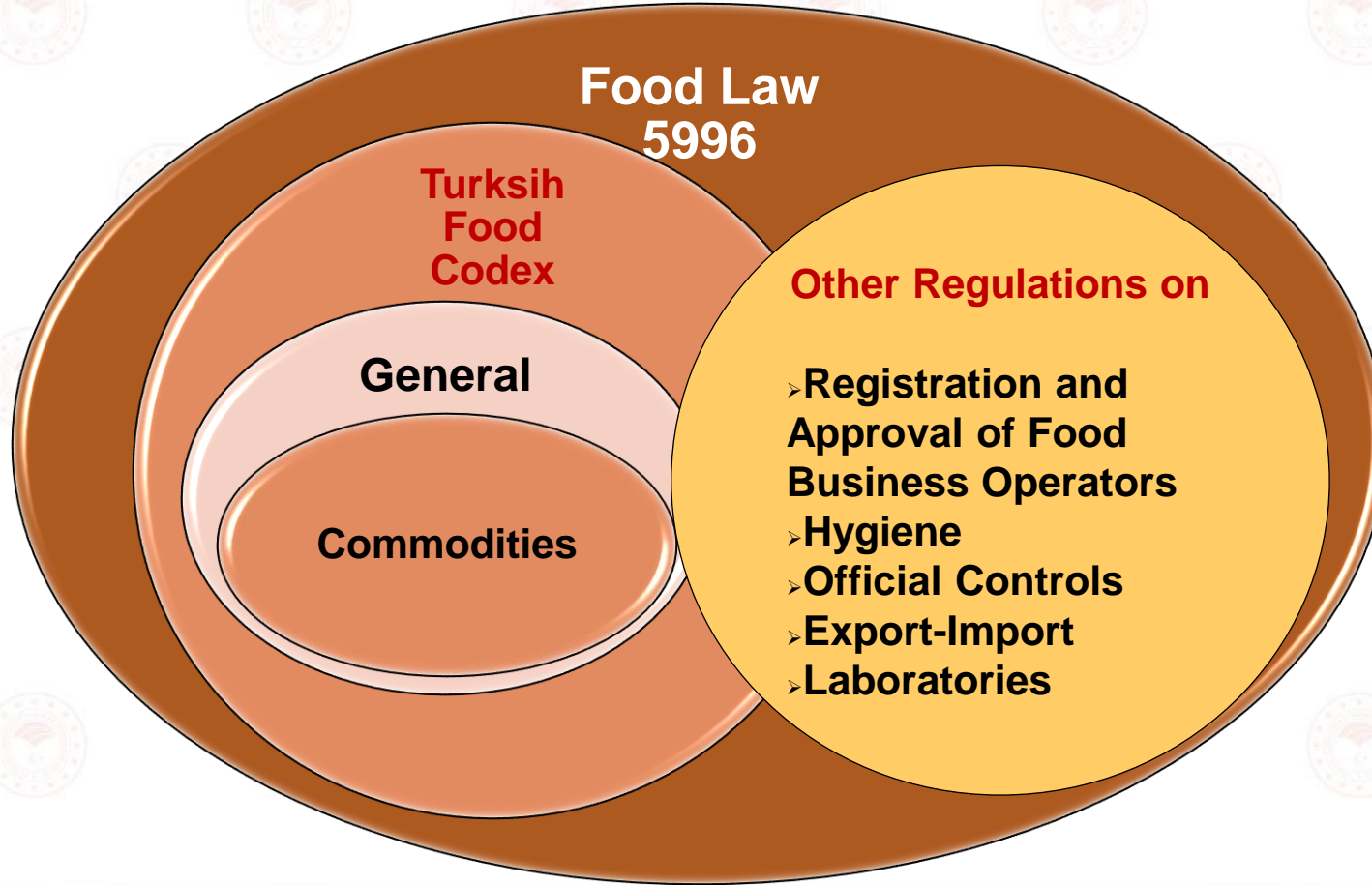
## Legal basis for Food Safety: Food Law - Act No: 5996

(Veterinary Services, Plant Health, Food and Feed)





## Legal basis for Food Safety: Food Law - Act No: 5996





## What is Turkish Food Codex?

Turkish Food Codex is the rules on the minimum technical and hygiene criteria related with food and **materials and articles in contact with food.**





National Food  
Codex Committee



+



edqm

Codex  
Department



Sub-Committees





## HORIZONTAL LEGISLATION

- Regulation on Registration of Establishments that are Producing Food Contact Materials and Articles and Good Manufacturing Practices  
(GMP Regulation)
- Turkish Food Codex Regulation on Food Contact Materials and Articles  
(TFC Regulation on FCM)



## ➤ VERTICAL LEGISLATION

- Plastic Materials and Articles
- Ceramic Materials and Articles
- Regenerated Cellulose Films
- Epoxidised Materials and Articles
- Paper and Board Materials and Articles
- Metal and Alloys Materials and Articles
- Glass Materials and Articles



## What's the source of Turkish Legislation on FCM?



*edqm*





# European Union

Framework Regulation (1935/2004/EC)



Good Manufacturing Practices Regulation (2023/2006/EC)



Specific Measures



## Substance Groups

Ceramic *Directive - 84/500/EEC*  
Regenerated Cellulose Films - *Directive 2007/42/EC*  
Plastics - *Regulation (EU) 10/2011*  
Active and Intelligent FCM - *Regulation (EC) 450/2009*  
**Recycled Plastics** - *Regulation 2022/1616/EU*



## Substances

Nitrosoamines - *Directive 93/11/EEC*  
Epoxy Derivatives - *Regulation (EC) 1895/2005*



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COUNCIL OF EUROPE



CONSEIL DE L'EUROPE

# Council of Europe





## Council of Europe

- Türkiye joined the Council on 9 August 1949.
- Since 2009, Türkiye actively participated in CoE Technical Experts Committee\* on FCM.

\*CD-P-SC Steering committee membership (before 2018)  
CD-P-MCA steering committee membership (since 2018)





## Being in CD-P-MCA;

- Information exchange between member states of CoE
  - Preventing overlap or unnecessary duplication of activities
  - Joint activities of researchers
- Consultation between MS about national regulatory activities

edqm

European Directorate  
for the Quality  
& HealthCare | Direction européenne  
de la qualité  
du médicament  
& soins de santé

COUNCIL OF EUROPE





## ➤ Actively participated works:

- TG on Metals & Alloys Guide/second edition
- TG on Enamelled FCM
- TG on documentation supporting compliance and safety of FCM



DEPARTMENT OF BIOLOGICAL STANDARDISATION, OMCL  
NETWORK & HEALTHCARE (DBO)

TC/rd  
Working document, with no legally binding status,  
intended exclusively for the addressees and their  
associates, under the responsibility of the addressees  
(listed opposite), Level 2  
English / Anglais

PA/PH/MCA (19) 17 R3

Strasbourg, May 2023

GROUP CD-P-MCA  
(EUROPEAN COMMITTEE FOR FOOD CONTACT MATERIALS AND ARTICLES / COMITE EUROPEEN SUR LES  
MATERIAUX ET OBJETS POUR CONTACT ALIMENTAIRE)

**Technical guide on documentation supporting compliance and safety  
of food contact materials**

Revised document submitted by Stefan Kucsera (Switzerland)  
EDQM Scientific Officer: Teresa Carrilho

DEPARTMENT OF BIOLOGICAL STANDARDISATION, OMCL  
NETWORK & HEALTHCARE (DBO)

SBA/rd  
Working document, with no legally binding status,  
intended exclusively for the addressees and their  
associates, under the responsibility of the addressees  
(listed opposite), Level 2  
English / Anglais

PA/PH/MCA (23) 1

Strasbourg, March 2023

GROUP CD-P-MCA  
(EUROPEAN COMMITTEE FOR FOOD CONTACT MATERIALS AND ARTICLES / COMITE EUROPEEN SUR LES  
MATERIAUX ET OBJETS POUR CONTACT ALIMENTAIRE)

**Technical Guide on Metals and Alloys used in  
food contact materials and articles, 2nd edition**

Final draft – for CD-P-MCA approval by correspondence  
Deadline: 24 May 2023  
Absence of a reply is considered as approval  
EDQM Scientific Officer: Susanne Bahrke

DEPARTMENT OF BIOLOGICAL STANDARDISATION, OMCL  
NETWORK & HEALTHCARE (DBO)

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associates, under the responsibility of the addressees  
(listed opposite), Level 2  
English / Anglais

PA/PH/MCA (23) 9

Strasbourg, October 2023

GROUP CD-P-MCA  
(EUROPEAN COMMITTEE FOR FOOD CONTACT MATERIALS AND ARTICLES / COMITE EUROPEEN SUR LES  
MATERIAUX ET OBJETS POUR CONTACT ALIMENTAIRE)

**Enamelled food contact material and articles – 7th meeting report,  
8 September 2023**

Submitted by Viviana Golja (Slovenia)  
EDQM Scientific Officers: Susanne Bahrke and Teresa Carrilho

Distribution  
For action :



# Complementarity of National Work - I

- Technical Guide on Metals and Alloys

In 2012: Project on Aluminium Release (By National Institute)

In 2018: Aluminium release limit added to the national regulation in line with the guide





## Complementarity of National Work - II

- Participating in Ad Hoc Group on Food Packaging (Contribution)
- Informing the industry about activities  
  - Dissemination of the drafts for the national standards
  - Providing information about CEN congresses



#ÜretimÜreticininYüzyılı



## Complementarity of National Work -III

- In EU level, there is no specific regulation for some material groups (e.g. metals, paper and board, colorants, enamels)
- CD-P-MCA focused on these groups.
- As a CoE member, Türkiye actively participated the CoE work on these FCM groups
  - Türkiye mostly adheres to the guidelines and recommendations regarding the safety and quality of FCM prepared by CD-P-MCA.
  - Giving advice to industry using these recommendations and guidelines.





## Actively Used Recommendations and Guidelines

- Colorant for Plastics (ResAP 89/1) – Transposed to national regulation
- Technical Guide on Metals and Alloys - RASFF notifications on metal FCM; Türkiye responds these notifications by using the guide.
- Technical Guide on Paper and Board - RASFF notifications on paper and board FCM - Türkiye responds these notifications by using the guide.



# Implementation Examples of the CoE Documents

	İSTANBUL GIDA KONTROL LABORATUVAR MÜDÜRLÜĞÜ			
	GIDA İLE TEMAS EDEN MADDE VE MALZEMELERDE FİTALAT ANALİZİ			
Doküman No: İGKL.AT.09.25	Yayın Tarihi: 23.03.2016	Rev.Tarihi/No :07.12.2023 / 02	Sayfa:1/7	

## 1. İLGİLİ DOKÜMANLAR, KAYNAKLAR ve EKLER

TS EN 13130-1, Materials and articles in contact with foodstuffs - Plastics substances subject to limitation - Part 1: Guide to test methods for the specific migration of substances from plastics to foods and food simulants and the determination of substances in plastics and the selection of conditions of exposure to food simulants

TS EN 14372:2004; Çocuklar için kullanım ve bakım eşyaları - Çatal-bıçak ve mama eşyaları - Güvenlik kuralları ve deneyler. "Child use and care articles - Cutlery and feeding utensils - Safety requirements and tests". (Aralık 2004)

TS EN 15519 Gıdalarla temas eden kağıt ve karton-Organik çözücü ekstraktlarının hazırlanması

TS EN 1541 Kağıt ve Karton-Gıda Maddeleri ile Temasta Olan- Sulu Özütte Formaldehit Tayini.

JRC Technical Report Testing conditions for kitchenware articles in contact with foodstuffs: plastics metals, silicates, paper and board

EDQM Paper and board used in food contact materials and article



## Implementation Examples of the CoE Documents

Alüminyum

### GGYS KAPSAMINDA YAPILAN DIŞ LABORATUVAR ANALİZLERİ

Araçlar	Salınım (migrasyon) Analizleri			Yönetmelik/Test Prosedürü	Test Süresi	Simülant	
	Analiz	Analiz yeri	Test periyodu				
8079, 8006M, 8079B, 8011, 1235, 1200, 1100	Salınım (migrasyon), sensory	Akredite Dış Lab.	minimum 2 yılda 1*	EDQM CoE (2024-2nd edition)	40 C 0 gün	Yapay Musluk Suyu	
8079	Salınım (migrasyon), sensory	Akredite Dış Lab.	minimum 2 yılda 1*	EDQM CoE (2024-2nd edition)	40 C 0 gün	Yapay Musluk Suyu	
8006M, 8006F, 8156, 8011, 3003	Salınım (migrasyon), sensory	Akredite Dış Lab.	minimum 2 yılda 1*	EDQM CoE (2024-2nd edition)	40 C 0 gün	Yapay Musluk Suyu	
8006F, 8156, 8026, 3423, 3003, 3005	Salınım (migrasyon), sensory	Akredite Dış Lab.	minimum 2 yılda 1*	EDQM CoE (2024-2nd edition)	40 C 0 gün	Yapay Musluk Suyu	
Container Foli	8006F, 8156, 8026, 3423, 3003, 3005	Salınım (migrasyon), sensory	Akredite Dış Lab.	minimum 2 yılda 1*	EDQM CoE (2024-2nd edition)	40 C 0 gün	Yapay Musluk Suyu
Foli	8006M, 8079	Salınım (migrasyon), sensory	Akredite Dış Lab.	minimum 2 yılda 1*	EDQM CoE (2024-2nd edition)	40 C 0 gün	Yapay Musluk Suyu
	1050, 3003,	Salınım (migrasyon), sensory	Akredite Dış Lab.	minimum 2 yılda 1*	EDQM CoE (2024-2nd edition)	100 C 2 saat	Yapay Musluk Suyu
	1050, 3105	Salınım (migrasyon), sensory	Akredite Dış Lab.	minimum 2 yılda 1*	EDQM CoE (2024-2nd edition)	100 C 2 saat	Yapay Musluk Suyu
Foli	8079	Salınım (migrasyon), sensory	Akredite Dış Lab.	minimum 2 yılda 1*	EDQM CoE (2024-2nd edition)	5 C 0 gün	Yapay Musluk Suyu

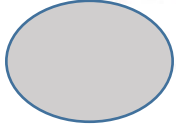
Etik deklare edilmediği sürece

Y kullanım

Yönetmelik/Test Prosedürü	Te
EDQM CoE (2024-2nd edition)	40
EDQM CoE (2024-2nd edition)	40
EDQM CoE (2024-2nd edition)	10
EDQM CoE (2024-2nd edition)	40
EDQM CoE (2024-2nd edition)	10
EDQM CoE (2024-2nd edition)	40
EDQM CoE (2024-2nd edition)	10
EDQM CoE (2024-2nd edition)	40
EDQM CoE (2024-2nd edition)	10
EDQM CoE (2024-2nd edition)	10
EDQM CoE (2024-2nd edition)	5 (
EDQM CoE (2024-2nd edition)	40



# Implementation Examples of the CoE Documents



MATBAACILIK

## DECLARATION OF CONFORMITY

(food contact and hygiene sensitive products)

Manufacturer Address:

### 3- Paperboard

The paperboard complies where applicable and under foreseeable conditions of use with;

- Europe: Regulation (EC) No 1935/2004 on materials on materials and articles intended to come into contact with food, (Regulation 1935/2004/EC and its amendment up to and including 2019/1381) and CM Resolution (2020) 9 Paper-and-board-used-in-food-contact-materials-and-articles (Council of Europe).
- Germany: BfR (Bundesinstitut für Risikobewertung) XXXVI. Paper and board for food contact (version 1.9.2017)

Effective Date:10.10.2015

Revision Date:14.03.2024

Revision No:09

FR.HJY.24



## Plans for Transposing CoE Documents to National Regulations

- Technical Guide on Paper and Board Used in Food Contact Materials and Articles (Pending for new edition)
- Technical Guide on Documentation Supporting Compliance and Safety of Food Contact Materials and Articles (pending for publication)



**TÜRKİYE CUMHURİYETİ**  
**TARIM VE ORMAN BAKANLIĞI**

**Thank you**

