



Spanish association
of pulp, paper and
board manufacturers

➤ The paper industry and its commitment to food safety

18th September 2024 EDQM-AESAN Symposium

**We work for the competitive and sustainable
development of the Spanish paper and pulp industry**

A background image showing a close-up of crumpled white paper, with some faint text visible on the surface, such as 'ard; teenind'.

➤ Index

1. Aspapel

2. The paper industry's approach to food safety requirements

2.1 Food contact guidelines

2.2 Good Manufacturing Practice Guideline

3. Future challenges

➤ 1. Aspapel



Mission

- To actively and proactively represent the sector.
- To effectively influence the political arena.
- To improve the competitiveness of member companies.
- Promote a positive image of the sector.
- To help attract talent and capital.
- Develop specific projects of interest.
- To provide a meeting forum.

Vision

Contribute to the **competitive and sustainable development** of its companies, promoting a **positive image** of a sector with the **capacity to influence**.



1978

Foundation of the Spanish association of pulp, paper and board manufacturers.

Represents



95%

Production in Spain

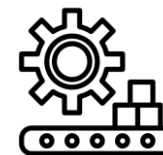
51

Associates



61

Mills



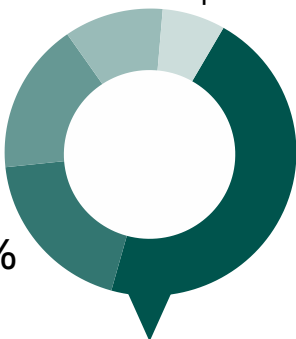
9,2%
Graphic papers

5,1%

Special Papers



7,2%
Tissue

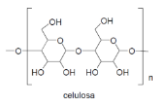


57,2%

Paper and cardboard:
packaging



Sectoral distribution of pulp and paper manufacturing companies in Spain associated with ASPAPEL



21,2%
Pulp

European representation ASPAPEL is a member of CEPI





Turnover



5.261

Million €



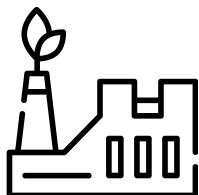
Investments 2023



5,5%

of total turnover

PRODUCTION



74

Paper mills



Paper **6** million t

Pulp **1.6** million t

Jobs

Direct **16.964**

Indirect **85.000**



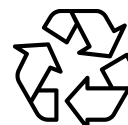
92% permanent jobs

Position in Europe



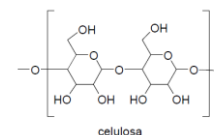
6th

Paper producer



3rd

Recycler



5th

Pulp producer



➤ 2. The paper industry's approach to food safety requirements

➤ The paper industry's approach

Food safety



THE PACKAGING

FOOD PACKAGING

FOOD SAFETY

REGULATIONS

It plays a vital role in the preservation and quality of food throughout the food chain, so it is necessary to take care of this stage.

They protect against possible contamination, but the manufacturing of food packaging has the potential to introduce hazards (physical, chemical, biological, and microbiological) and contaminate food with possible effects on consumer health.

We must ensure the safety of the packaging and that it does not transfer any harmful substances to the food that could pose a risk to the consumer's health

FCMs should be sufficiently inert so that their constituents neither adversely affect consumer health nor influence the quality of the food. To ensure the safety of FCMs, and to facilitate the free movement of goods, EU law provides for binding rules that business operators must comply with.



General legislation for all food contact materials (European Union)



Regulation (EC) No 1935/2004 (Framework Regulation)

It provides the basis for securing a high level of protection of human health and the interests of consumers regarding materials and articles intended to come into contact directly or indirectly with food

Regulation (EC) No 2023/2006 (Good Manufacturing Practice Regulation)

Establishes standards for Good Manufacturing Practice for materials and articles intended to be in contact with food

So far, no specific EU measure has been introduced for paper and board.



Council of Europe

committed to ensuring citizens' right to health protection as a human social right and an essential condition for social cohesion and economic stability.





FRANCE: Fiche MCDA n°4 (V02 – 01/01/2019)
Aptitude au contact alimentaire des
matériaux organiques à base de fibres
végétales destinés à entrer en contact avec
des denrées alimentaires.

GERMANY: German Federal
Institute for Risk Assessment
(BfR) publishes recommendations
for the production of materials
which are not subject to any
statutory provisions.

ITALY: Decreto Ministeriale del
21/03/1973. Disciplina igienica degli
imballaggi, recipienti, utensili, destinati a
venire in contatto con le sostanze
alimentari o con sostanze d'uso personale
(e l'ne sue modifiche).

➤ The paper industry's approach

Industry initiatives for the food safety of paper and board materials and articles



As a result of this commitment and the involvement of Industry associations of the value chain, guidelines have been developed to help in the compliance of paper and board materials and articles for food contact.

The paper industry maintains its commitment to protecting human health and defending consumer interests by providing safe and functionally effective materials.





- Voluntary guideline*.
- Providing guidance to show compliance of the suitability of materials and articles for a variety of food contact applications in the absence of a specific measure for fibre-based materials and articles.
- Extends the scope from paper and board (substrate) to finished articles.
- Includes also beverage cartons and tissue.
- Aimed at all those with an interest in ensuring the safety of paper and board intended for food contact (manufacturers and suppliers, National Authorities, Consumers).
- Download the guide [here](#).

*NI: The contents of this document are advisory and not legally binding. This is a guideline intended to help the paper and board industry demonstrate compliance to EU Regulation.



Associations behind the Guidelines



ACE (The Alliance for Beverage Cartons and the Environment)

CCB (Cepi Container Board)

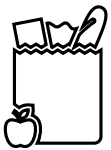
CEPI (Confederation of European Paper Industries)

CITPA (International Confederation of Paper and Board Converters in Europe)

ETS (European Tissue Symposium)

ECMA (European Carton Makers Association)

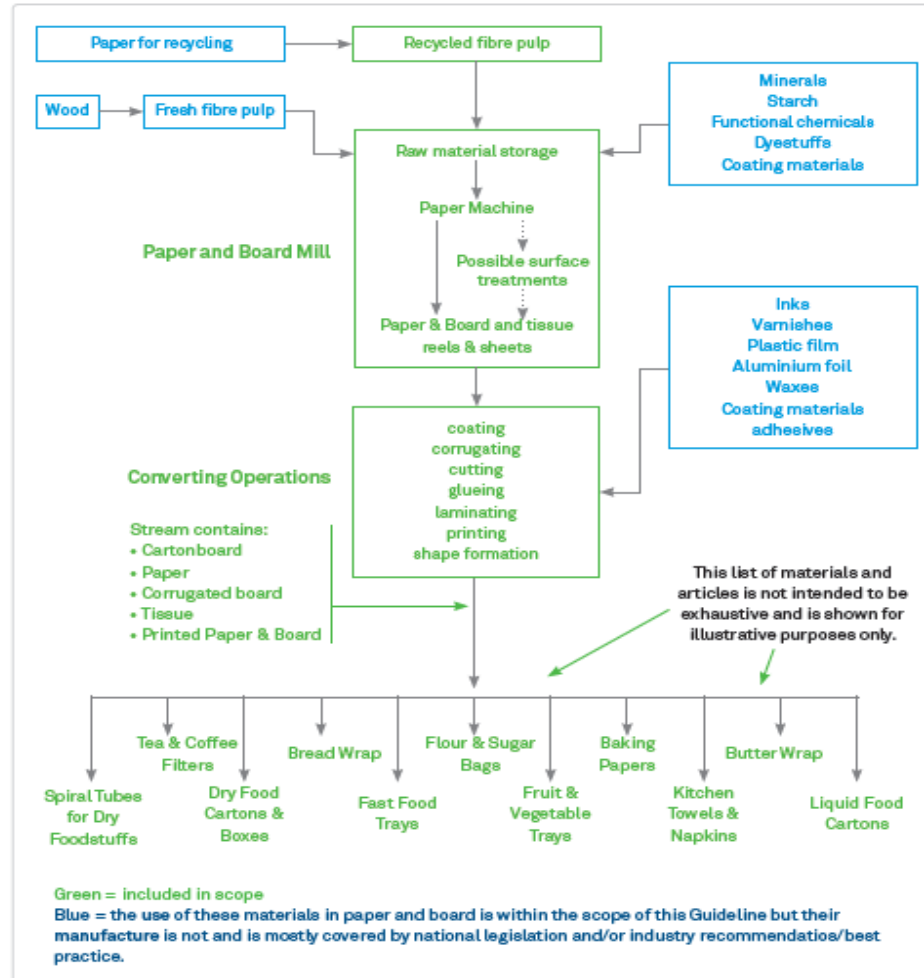
FEFCO (European Federation of Corrugated Board Manufacturers)



Area covered by the scope of the Guidelines

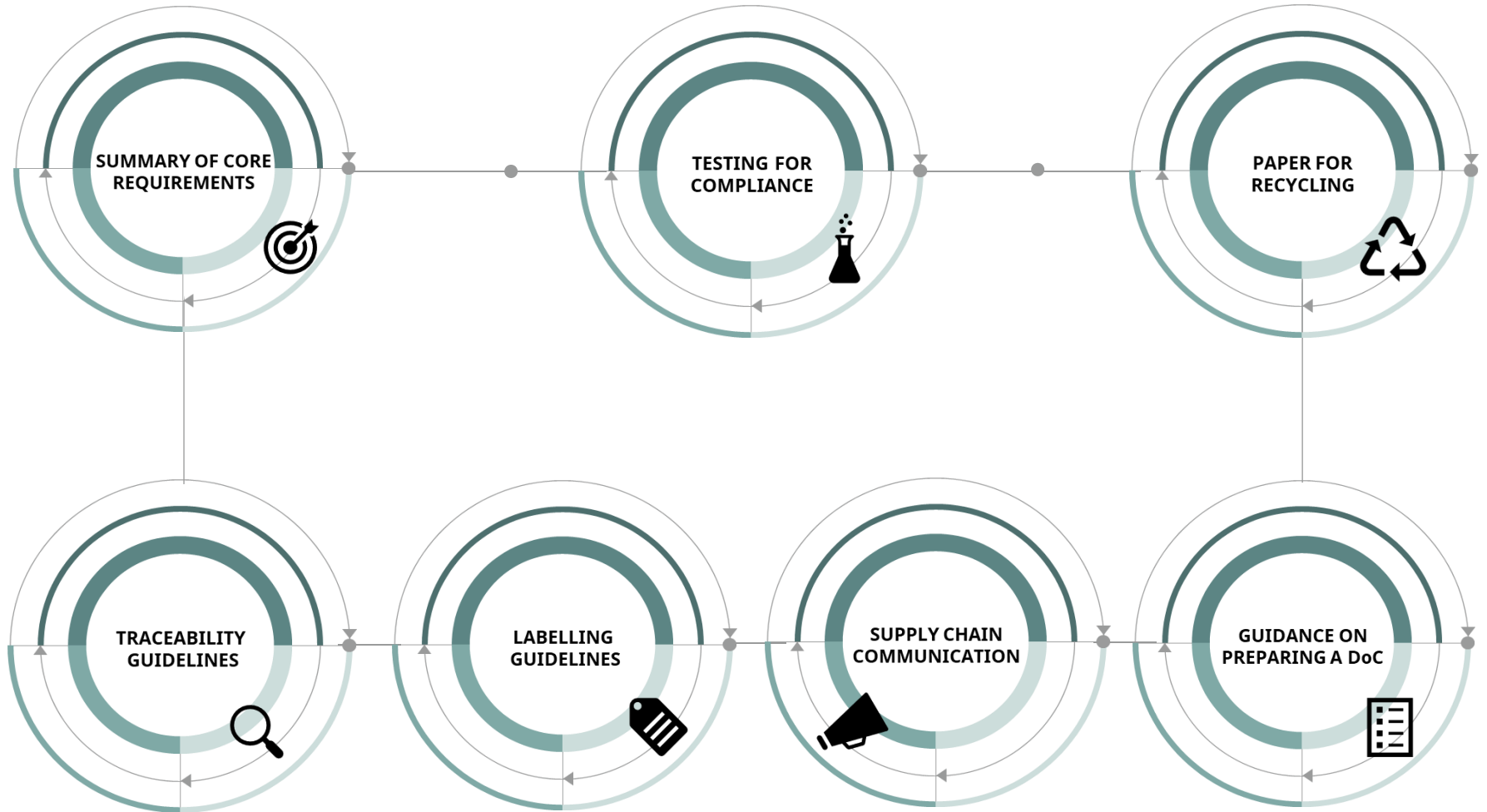
This diagram is intended only to give a general idea of the 'shape' of the operations covered by this Guideline and is not intended to give a fully accurate representation of the flow-lines or products.

Figure 1





Key topics





Examples of how the guide assists stakeholders



3.8 TESTING FRAMEWORK

Figure 2

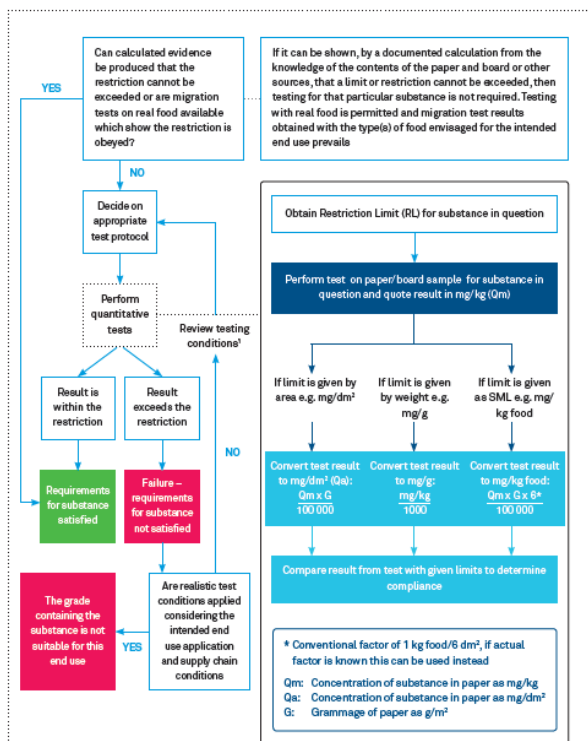


TABLE 1: TESTING RECOMMENDATIONS FOR KNOWN NIAS

NIAS REQUIREMENTS FOR ALL PAPER/BOARD GRADES IRRESPECTIVE OF FIBRE SOURCE					
Substance	Requirement		Source	Method	Food type
	QMA ^a	SML ^b			
NIAS in intentionally added chemicals according to information from suppliers	According to communication from suppliers	According to communication from suppliers	According to communication from suppliers		According to communication from suppliers
Cadmium (Cd)	5 ug/l cold water extract 0.5 mg/kg paper or board	-	DE:BFR XXXVI ⁷ FR: DGCCRF ²⁰	EN 12498 ²⁰ EN 12498	Moist and/or Fatty Moist and Fatty
Lead (Pb)	10 ug/l cold water extract 3 ug/dm ² paper or board 3 mg/kg paper or board	-	DE:BFR XXXVI IT: DM 21.03.73 ³² FR: DGCCRF	EN 12498 Allegato IV Sez VI.5.2 EN 12498	Moist and/or Fatty All Moist and/or Fatty
Mercury (Hg)	0.3 mg/kg paper or board	-	FR: DGCCRF	EN 12497 ²¹	Moist and/or Fatty
Chromium (CrVI)	0.25 mg/kg paper or board	-	FR: DGCCRF	EN 12498	Moist and/or Fatty
Pentachlorophenol (PCP)	0.1 mg/kg paper or board	-	FR: DGCCRF	EN-ISO 15320 ²⁴	All
Antimicrobial substances	The finished paper or paperboard must have no preserving effect on the foodstuffs with which they come into contact.	-	DE:BFR XXXVI FR: DGCCRF	EN 1104 ²⁵ EN 1104	All All

^aMaximum permitted content in paper or board expressed as mg/kg paper or board or as mg/dm² paper or board

^bMaximum permitted transfer to food expressed as mg/kg food

* Conventional factor of 1 kg food/6 dm², if actual factor is known this can be used instead
 Qm: Concentration of substance in paper as mg/kg
 Qa: Concentration of substance in paper as mg/dm²
 G: Grammage of paper as g/m²



Examples of how the guide assists stakeholders

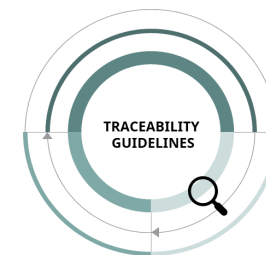
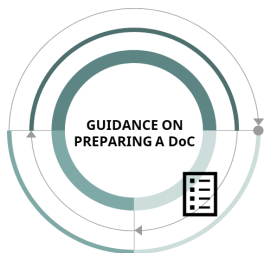


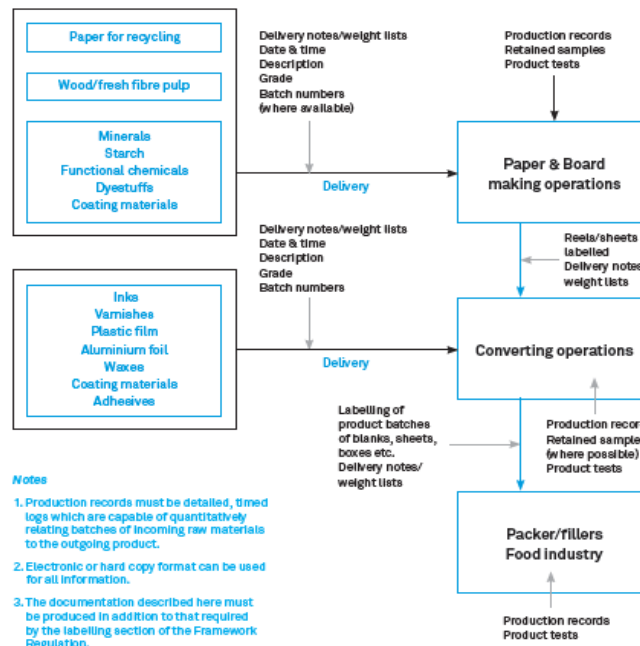
Table 3. Declaration of Compliance – List of Contents

MAIN ELEMENT	DETAILS	COMMENTS
Date	1. Date of Declaration of Compliance (DoC)	
Business operator issuing the DoC	2. Identity and address of the organisation which manufactures the materials or articles	
	3. The address of the manufacturing site. The address of the manufacturer.	Only if different from the first address
Identity of the materials and articles	4. Generic product description	
	5. Trade name or grade description, including other relevant identifying information. Description of the product.	
Confirmation of compliance with legislation and Food Contact Guidelines	6. Statement that the product complies with the relevant requirements of the Framework Regulation and relevant Food Contact Guidelines	
	7. Statement that the different non-harmonised materials (paper and board, inks, adhesives, coatings) as well as polymer layers in MMLs comply with existing reference legislation and food contact guidelines, when these exist	
	8. Known migrants with SML restrictions for paper and board in BfR XXXVI or other relevant lists of authorised substances, and intentionally added substances that, based on risk assessment can potentially migrate to food, should be communicated to downstream operators	Compulsory
	9. Dual use substances (deliberately added only) with quantitative restrictions in food legislation	When risk assessment indicates that there is a risk of transfer to food
	10. Statement on end uses or the restrictions of use, if any (e.g. food type, temperature)	

Figure 4

TRACEABILITY IN THE PAPER & BOARD SUPPLY CHAIN

This diagram shows examples of the various documents and tools which are used to establish product traceability. The list is neither exhaustive nor compulsory as operators will decide which tools best enable the requirements of traceability, within the Framework Regulation, to be met.





Cepi
RENEWABLE
RECYCLED
RESPONSIBLE
EUROPEAN PAPER

GOOD MANUFACTURING PRACTICE GUIDELINE FOR THE MANUFACTURE OF PAPER AND BOARD FOR FOOD CONTACT

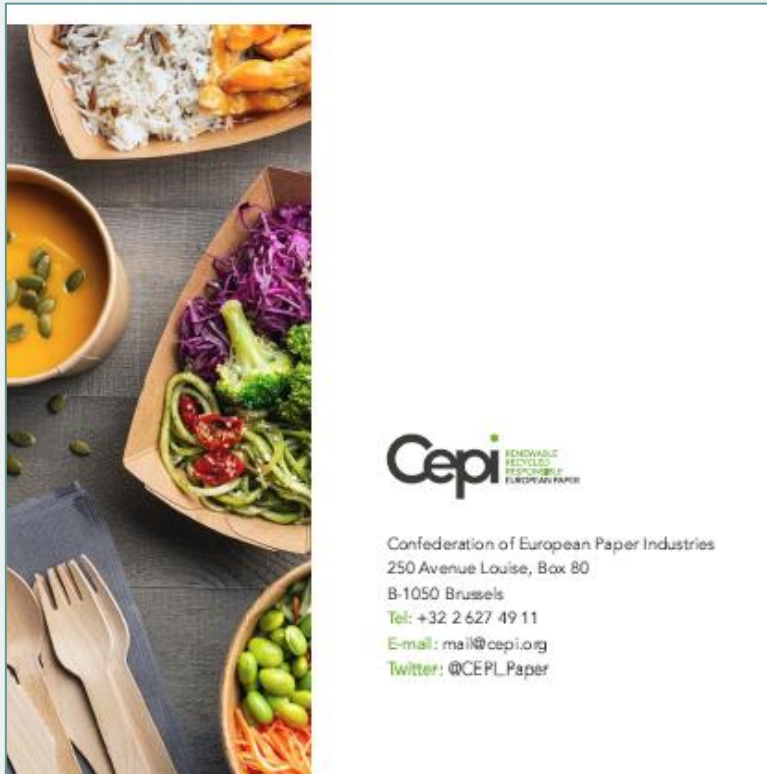


- Voluntary guideline*.
- Roadmap for paper and board manufacturers to implement a GMP system for food contact materials and articles.
- Guidance/Checklist for the auditors inside and outside the mill.
- To be read together with the Food Contact Guidelines for the Compliance of Paper & Board Materials and Articles.
- Download the guide [here](#).

*NI: The contents of this document are advisory and not legally binding. This is a guideline intended to help the paper and board industry demonstrate compliance to EU Regulation.



Association behind the Guidelines



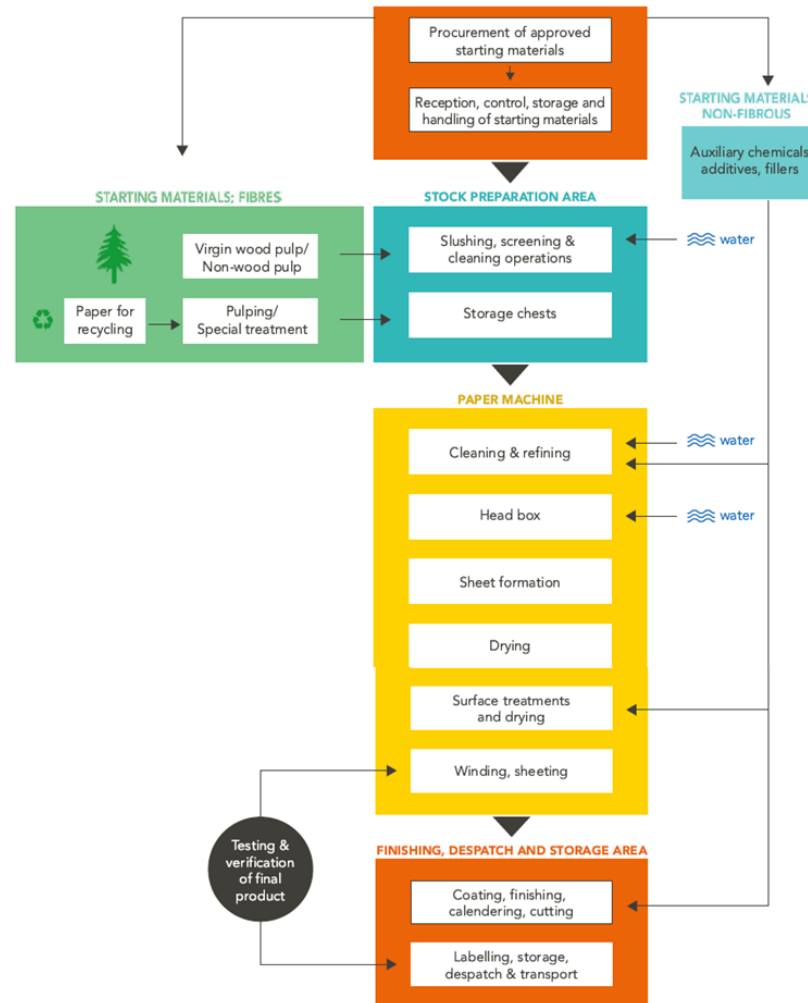
Confederation of European Paper Industries
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CEPI (Confederation of European Paper Industries)



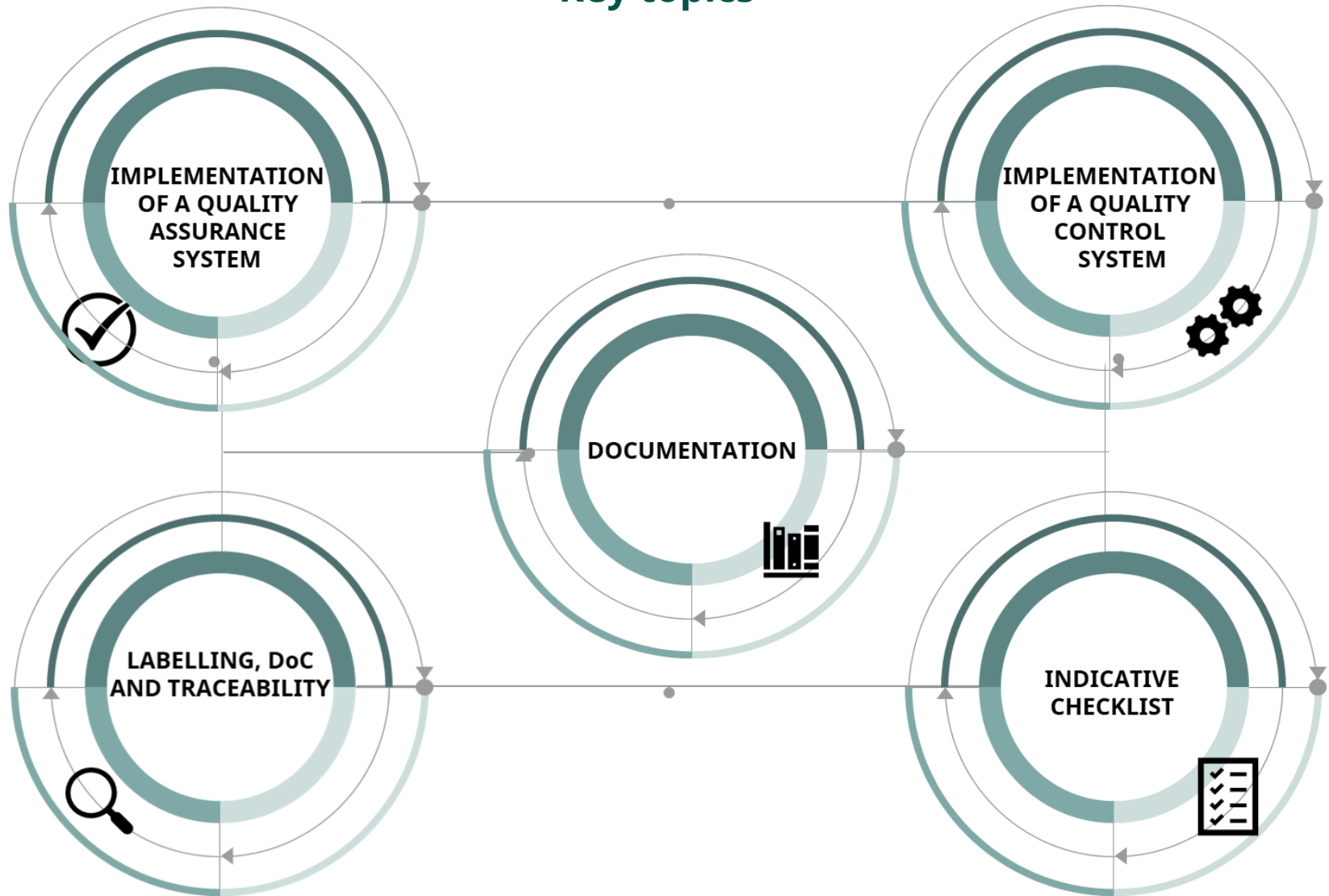
Area covered by the scope of the GMP Guidelines

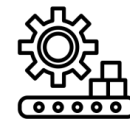
Figure 1 - Schematic Representation of the Activities covered by this GMP Guideline





Key topics





Examples of how the guide assists stakeholders



A2.3. Performing the Risk Assessment

Follow the steps shown in Figure 3

Figure 3 - Steps in the Risk Assessment Process

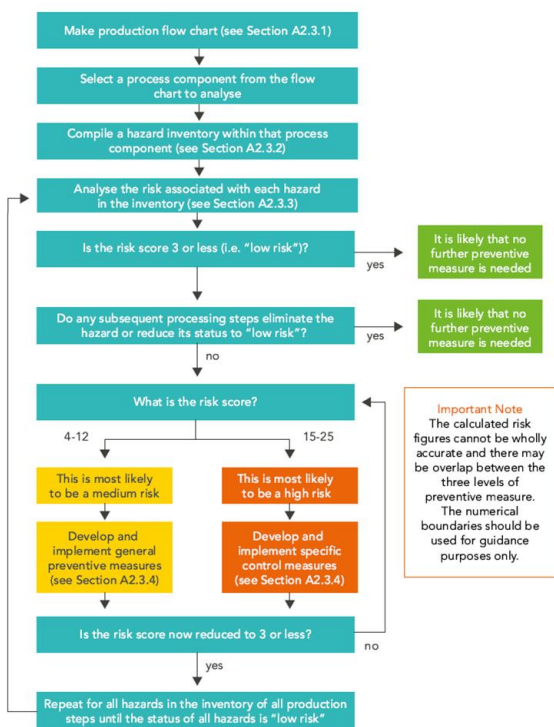


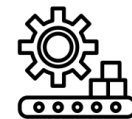
Table 5 - Examples of Documentation of Hazards, Risk Assessment and their Associated Preventive Measures

Process Step	Hazard	Severity	Likelihood	Risk	Low Risk	Medium Risk	High Risk	Preventive Measures	Residual Likelihood (after Preventive Measures)	Residual Risk (after Preventive Measure)
raw material purchasing	incorrect pulp	C	3	2	6		X	define/document process (procedure) incl. checklist	1	3 (low)
	starch out of microbiological specs	B	3	2	6		X	define specification with supplier; verify starch quality risk based-periodically in the lab	1	3 (low)
stock preparation & paper/board machine	use wrong additive	C	3	2	6		X	define/document process (procedure) incl. checklist, evaluate all chemicals prior sourcing	1	3 (low)
	incorrect dosage	C	3	2	6		X	install inline flow meter (control & document dosage)	1	3 (low)
slitting & winding	metal part of snap off blade in finished pallet	P	5	4	20			nosnap off blades to be used onsite (metal policy)	1	5 (medium)
transportation	paper is contaminated with chemicals during transportation	C	5	3	15			define hygiene transport criteria with the logistics partner in the contract, check/document hygiene of each transportation device	1	5 (medium)

Key: C = Chemical contamination

P = Physical contamination

B = Biological contamination



Examples of how the guide assists stakeholders

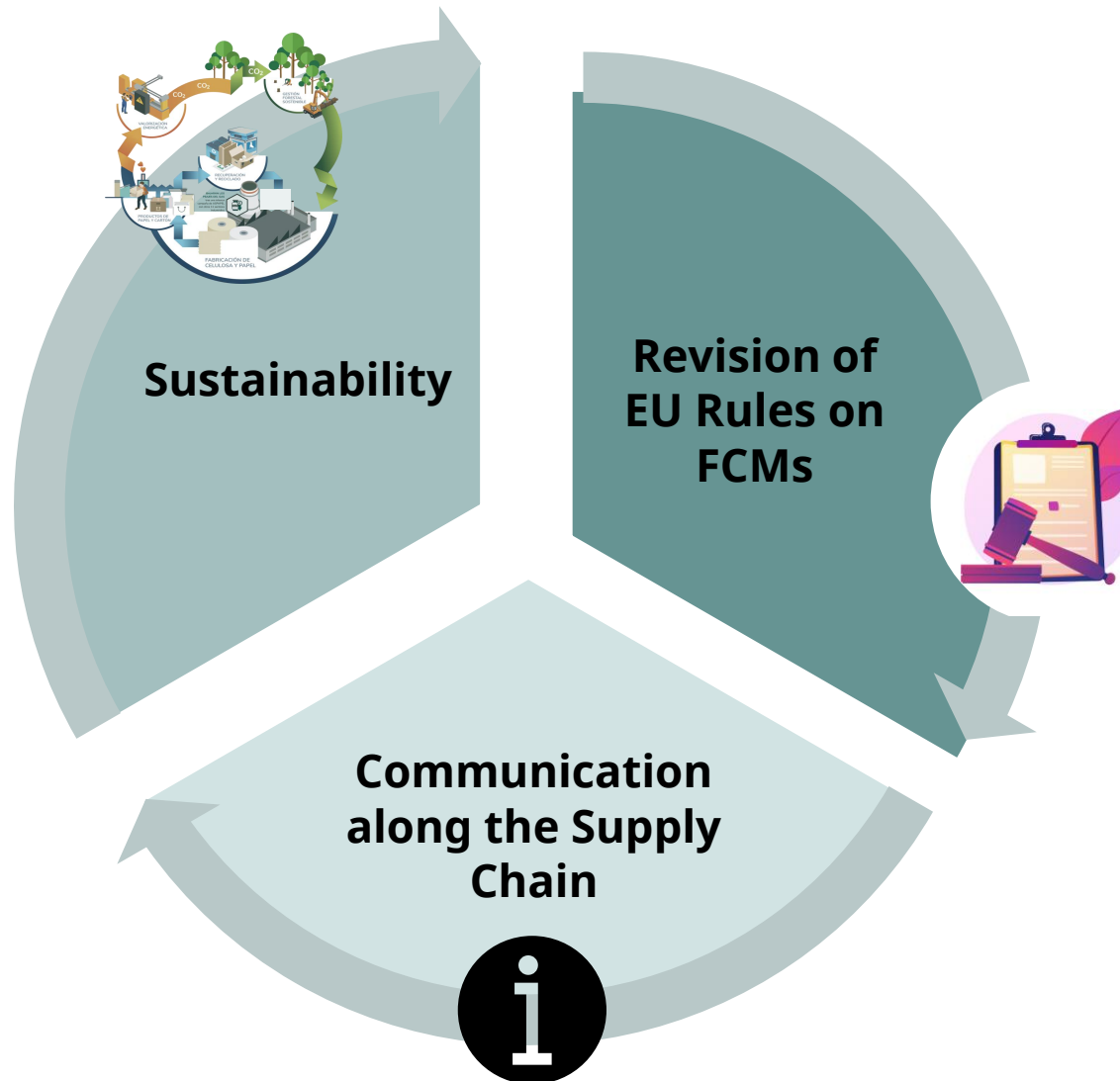


Table 2 - Indicative Checklist for Elements of the GMP System

Component of the GMP System	Section of the GMP Guidelines	Comments
Implementation of a Quality Management System		
ISO 9001 or equivalent quality management system should be implemented.	4.	
Quality policy should include aspects specific to food contact.	4.	
Management Responsibility and Organisation		
Management should show leadership and commitment to GMP systems and ensure conformity of the operations and supplied paper and board to the relevant requirements.	4.1	
A food/product safety/hygiene team and/or a designated person for GMP implementation and maintenance should be appointed.	4.1	The requirement should be proportional to the size of the business.
Adequacy, knowledge, and skills of personnel. Training		
New and existing personnel including subcontractors should be trained on GMP requirements and hygiene aspects specific to the food contact material.	4.2	Needs to apply only to personnel working in areas where the food contact material could be affected. Informal briefings may suffice in circumstances where the risk is low.
Training records should be maintained for all personnel that have been trained.	4.2	
There should be clear internal communication with all appropriate staff and personnel about the GMP requirements and any relevant changes to the GMP practices.	4.2/5.2	
Risk Analysis, Risk Assessment, Risk Management		
Risk assessment (see Annex 2) should be performed an annual review is required.	4.3	Implication of changes likely to affect product safety should be reviewed on an ongoing basis.
For the risk management there should be a plan and implemented controls and measures to manage the observed risks in order to maintain the necessary level of safety and compliance with legal and customer requirements.	4.3	

Selection of Suppliers – Compliance of starting materials		
All starting materials used in the production of the food contact material should be assessed to ensure compliance with the current regulatory requirements and the intended end use application.	4.6	Suppliers should provide documentation showing conformity with the current regulations. In cases where suppliers change the composition and/or introduce new raw materials or additives to their products, where new suppliers are used or the regulations change, a compliance documentation has to be updated accordingly.
The requirements for individual non-fibrous raw materials should be specified using a risk assessment. A specific factor to consider would be whether the process chemical is likely to remain in the supplied food contact paper and board.	4.6	
Records of all starting materials and relevant process chemical deliveries should be kept so that conformity with regulatory requirements can be checked.	4.6/6	
Suppliers of paper for recycling should supply documented evidence of conformity with the Capi Guidelines for Responsible Sourcing. The requirement for this conformity should be included in the contractual arrangements.	4.6	
There should be documented requirements, approval procedures and monitoring for all suppliers and subcontractors.	4.6	
Conformity to pre-established instructions and procedures		
Procedures for ensuring the accuracy of substance input using dosing equipment should be in place to ensure correct addition of functional additives and process chemicals having a compositional limit in the final product.	4.7/5.1	
Storage, shipment, transport and delivery		
All vehicles used for transporting mill finished product should be suitable for the purpose, well maintained and in a good state of hygiene. Contractual arrangements with transport companies should include requirements for hygiene and cleaning. There should be a preloading check procedure in place for checking transport of finished products paper and board for cleanliness and water tightness.	4.8/4.6	
All external warehouses should be suitable for the purpose, well maintained and clean. Contractual arrangements with the supplier of warehousing facilities should include requirements for hygiene, pest control and cleaning.	4.8/4.6	

➤ 3. Future challenges





Close monitoring of the revision is conducted within the sector

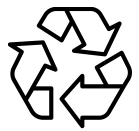


Challenges:

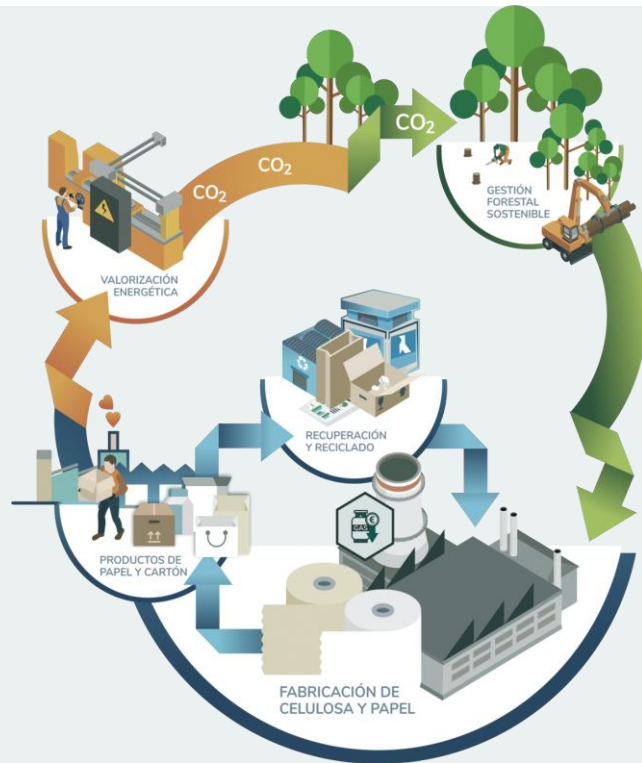
- Shift in focus towards the final product.
- Grouping into broader material categories.
- Risk assessment of substances, classification of substance types.

Industry needs:

- Analytical methods that are fit for and tailored to paper and board characteristics.
- Development of a harmonized measure for paper and cardboard.
- Facilitate the development of innovative safe and sustainable products.



A sector as an example of circular economy



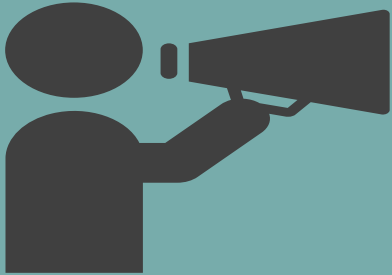
Industry based on a natural and renewable raw material that massively recycles its products.

An example of collaborative innovation



4evergreen

At the European level 4evergreen initiative formed by the entire value chain to develop recyclability solutions.



- Industry committed to proper communication as a prerequisite **for food safety.**
- **Guidelines** place significant emphasis on the accurate preparation of the declaration of compliance.
- Challenges: **Development** of an easy and efficient IT-infrastructure.



Thanks for your attention

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ASPAPPEL se compromete a cumplir con los principios y valores de su Código de Conducta, en sus relaciones con las autoridades, cargos electos y demás empleados públicos.



Nº Registro Transparencia Unión Europea: 814014013312-48



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<https://www.linkedin.com/company/aspapel/about/>