



RECYCLED PET IN FOOD CONTACT APPLICATIONS¹

As the collection and recycle of PET bottles in Europe grew, the PET industry recognised that recycled PET outlets were reaching saturation and we needed to recycle PET back into food contact packaging. As PET is the only polymer manufactured exclusively to food contact regulatory standards, the PET industry identified PET as the right candidate to lead recycle back to food contact.

In Europe there were little or no harmonised regulations and some countries even banned the use of recycled plastics in food contact applications. The PET industry decided to drive for a European-wide regulation and chaired a meeting of EU industry associations with an interest in recycled plastics in food contact applications. This group proposed a recycle regulation to the EU Commission. Member States and Industry finally agreed a Regulation for Europe in March 2008 - (EC) 282/2008.

This Regulation lays down a series of rules for recycled plastics to be used to package food which:-

- must be exclusively mechanically recycled;
- exclude chemical recycling and in-house scrap;
- exclude recycled plastics behind a functional barrier;
- stipulate only food contact plastics, used for food contact applications, can be recycled back to food contact applications;
- state that articles made from recycled plastics and intended for food contact must comply with Article 3 of Regulation 1935/2004 (no contamination);
- require good manufacturing practice, as laid down in Regulation 2023/2006;
- require an effective, audited, QA system;
- mandate the European Food Safety Authority (EFSA) to approve complete processes for the recycle of plastics to food contact applications.

The Industry believes the Regulation is clear and fit for purpose.

EFSA has proposed guidelines to approve recycle processes for plastics to food contact applications. However the PET Industry perceives positive points and potential issues with these guidelines:-

The positive points:-

- They are based on good science;
- They are data-based;
- They are independent.

¹ This column is based on a presentation made at Identiplast 2009 by Mark Kenrick, PTA Business Director of Artenius's PET & PTA Division, Chairman of the *PlasticsEurope* PET Committee and a Petcore Board member.



The perceived issues are:-

- There is a lack of clarity versus what is 'acceptable';
- They do not appear to recognise different process steps in the value chain. They give collective authorisation with no regard to individual steps and whether they have been previously approved;
- New installations require full approval with no credit for technology/previous partial approval.

The net effect is that, as written, the guidelines de-incentivise new recycle plant investment.

The PET Industry therefore recommends:-

- EFSA recognises that the value chain has 3-5 processes from feedstock reception to final product and these can be independent and collective;
- For new technologies EFSA should provide time-limited approval for individual plants, based on trial and pilot plant scale processes and provide speedy approval for individual full scale processes when ready;
- For existing technologies EFSA should simplify the approval process and approve individual processes and feedstock streams recognising the part they play in the whole recycle process.

The PET Industry will meet consumer expectations and maintain the highest level of health, safety and environmental standards. It fully supports innovation, growth and investment in the recycling value chain.

The PET Industry positively drove the need for, and supports the Recycle to Food Contact Regulation but we need EFSA to produce a flexible process mechanism to allow appropriate approvals.