



EUROPEAN COMMISSION
HEALTH AND FOOD SAFETY DIRECTORATE-GENERAL

Food and feed safety, innovation
The Director

Brussels,
SANTE/E2/JB/aa (2019) 3180968

Dear Petitioner,

Subject: Call on the European Commission to protect European consumers from mineral oils and other potentially hazardous substances migrating into our food from recycled cardboard

Thank you for submitting your petition on "No dangerous mineral oils in our food" to Commissioner Andriukaitis. The Commissioner has asked me to reply on his behalf.

The Commission follows this important issue closely. The scientific opinion from the European Food Safety Authority (EFSA) published in 2012 identified a range of possible different sources of mineral oils in food, including cardboard packaging. In this opinion, EFSA highlighted the many uncertainties and complexities of this subject and made a series of recommendations to be addressed.

At present, it is not possible to introduce measures at EU level on mineral oils due to the significant scientific limitations that exist. These include lack of information on the occurrence and sources of mineral oils in food, particularly those that are toxicologically significant and make a relevant contribution to consumer exposure, as well as an absence of suitable and available analytical methodology, which would render any such measure impractical at this time.

The Commission has taken the initiative to publish a Recommendation¹ in this area, which aims to characterise the occurrence and sources of contamination at various stages of food production including the possible contribution from paper and board food packaging materials and the effectiveness of functional barriers. The work will also help improve analytical methods and enforcement capabilities, facilitated by the EU Reference Laboratory, who recently published guidance² in support of the Recommendation.

Under the monitoring Recommendation, the occurrence data in different food products will also allow an estimate of the exposure of EU consumers to these substances. This information is needed in order for EFSA to update its risk assessment before starting any discussions on possible maximum levels in the EU for MOH in food and on possible migration limits for food contact materials.

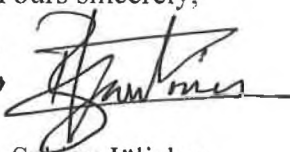
¹ Commission Recommendation (EU) 2017/84 of 16 January 2017 on the monitoring of mineral oil hydrocarbons in food and in materials and articles intended to come into contact with food

² <http://publications.jrc.ec.europa.eu/repository/handle/JRC115694>

Additionally, the European Commission is closely following the work of EU Member States on this issue and relevant initiatives being undertaken by industry, including development of analytical methodology and technical solutions to prevent possible mineral oils contamination from food packaging, such as the use of functional barrier layers and use of paper from primary sources. The Commission also welcomes the study published by EFSA in 2017 to elaborate further on bioaccumulation and toxicity of saturated mineral oils³.

In addition, the Commission is presently undertaking a full evaluation of the EU food contact materials legislation⁴. Once the evaluation is complete, the Commission will conclude on the results and consider what, if any, possible steps need to be taken in the future on food contact materials where there is no harmonised legislation at EU level, such as paper and board food packaging including the presence of mineral oils.

Yours sincerely,

p/o 

Sabine Jülicher

³ <https://efsa.onlinelibrary.wiley.com/doi/10.2903/sp.efsa.2017.EN-1090>

⁴ https://ec.europa.eu/food/safety/chemical_safety/food_contact_materials/evaluation_en