

## Legislation – Food Packaging – Belgium

On September 25, 2016, Belgium passed a royal decree on **varnishes and coatings intended to come into contact with foodstuffs**, which entered into force on January 1, 2017. The decree allows substances listed in the EU Plastics Regulation (EU No 10/2011) or approved by another Member State or the European Food Safety Authority to be used intentionally to manufacture food contact coatings. Individual substances should not migrate above their specific migration limits, or if unavailable, should not exceed the generic limit of 60 mg/kg of food. Substances that do not migrate to a detectable amount in food, are not classified as carcinogenic, mutagenic or toxic to reproduction (CMR), and are not in nanoform, are also permitted. Coatings and varnishes intended for food contact are requested to be accompanied by a compliance statement.

Migration should be tested according to the EU Plastics Regulation and the Commission's migration guidelines, but there are concerns that these methods will be applied inappropriately to non-plastic food contact materials, such as coatings and printing inks. Trade associations covering non-plastic sectors are working to develop their own migration testing guidelines, and demonstrate where the approach specified for food contact plastic is not suitable.

[The Belgian and Dutch authorities are reported to be working on aligning their national legislation on food contact coatings.](#)

The information contained herein is based on data believed to be up-to-date and correct at the time writing. It is provided to our customers in order that they are able to comply with all applicable health and safety laws, regulations, and orders. In particular, customers are under an obligation to carry out a risk assessment under relevant Good Manufacturing Practices (GMP) in line with legislation and as a result take adequate measures to protect consumers.