

Legislation – Food Packaging – EU - GMP

Regulation (EC) No 1935/2004 requires that food contact materials are manufactured in compliance with good manufacturing practice (GMP). The rules for GMP are laid out in the Regulation on Good Manufacturing Practice (EC) No. 2023/2006, which ensures that the manufacturing process is well controlled so that the specifications for FCMs remain in conformity with the legislation:

- premises fit for purpose and staff awareness of critical production stages
- documented quality assurance and quality control systems maintained at the premises, and
- selection of suitable starting materials for the manufacturing process with a view to the safety and inertness of the final articles

Good manufacturing rules apply to all stages in the manufacturing chain of food contact materials, although the production of starting materials is covered by other legislation. This includes the establishment of, and adherence to, an effective and documented quality assurance system, and an effective quality control system, together with appropriate documentation. As well as controlling the level of migration, visible and invisible set-off must be prevented in the print process.

In anticipation of the German Printing Ink Ordinance and with increased emphasis on direct food contact applications, EuPIA released a new, updated version of its [Good Manufacturing Practice \(GMP\) document](#). This latest edition of the GMP guide has been fully updated and expanded to cover the manufacture of all varnishes, coatings and inks intended to be printed onto food contact materials (FCM), including all non-food contact and food contact surfaces of packaging and containers. The 47-page document includes references to EU regulations and opinions of the European Food Safety Authority (EFSA), as well as national regulations such as the Swiss Ordinance on printing inks for food packaging. It also provides a comprehensive reference document which clearly outlines all steps required to ensure compliance in relation to food packaging and safeguard against potential hazards.

There are now a number of specific GMP documents available from different sector trade associations, detailing the requirements for different parts of supply chain. These individual sector GMP documents are designed to translate the GMP requirements into processes and best practices that can be easily understood and implemented by their members. The following documents are readily available from the relevant trade association website:

EuPIA: Good Manufacturing Practice (GMP) Printing Inks for Food Contact Materials, 4th edition, March 2016
(www.eupia.org) https://www.eupia.org/fileadmin/user_upload/160331_EuPIA_GMP_4th_version_final.pdf

PlasticsEurope, EuPC and Cefic-FCA: Guidelines for Good Manufacturing Practice for plastic materials and articles intended for food contact applications, June 2011
(www.plasticseurope.org)
https://www.plasticseurope.org/application/files/7315/1862/2612/PlasticsEurope_Guidelines_for_GMP_updated_June_2011.pdf

Flexible Packaging Europe and CITPA: Code for Good Manufacturing Practices for flexible and fibre-based packaging for food, July 2011 (www.flexpack-europe.org)
https://www.flexpack-europe.org/files/FPE/downloads/FPE_GMP_Code_6.0.pdf

ECMA: Good Manufacturing Practice Guide, March 2021 (www.ecma.org)
<https://www.ecma.org/industry-topics/food-safety/-gmp/>

CEPI: Good Manufacturing Practice for the Manufacture of Paper and Board for Food Contact, September 2010 (www.cepi.org)
<https://www.cepi.org/good-manufacturing-practice-for-the-manufacture-of-paper-and-board-for-food-contact/>

Empac: Guide to good manufacturing and hygiene practices for metal packaging in contact with food, May 2009, (www.empac.eu)
<https://www.pac.gr/bcm/uploads/gmp-metal-packaging.pdf>

FEFCO: GMP International Good Manufacturing Practice Standard for Corrugated & Solid Board, January 2006 (www.fefco.org)
<https://www.fefco.org/technical-documents/gmp-good-manufacturing-practice>

FEICA: Guideline for Good Manufacturing Practice of food packaging adhesives in reference to Regulation (EU) No 2023/2006, March 2015 (www.feica.eu)
https://www.feica.eu/information-center/industry-guidelines/preview/951/feica-guidance-paper-2015-guideline-good-manufacturing-practice-food-packaging-adhesives?id=a3fe8c1a-c67c-415d-b293-afd45c52ebbe&filename=20170123213244-GUP-EX-E03-011_L_FEICA_GMP_Guideline.pdf

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.