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Recycled Paperboard Technical Association Comprehensive Program for Food-Contact Paperboard Produced From Recycled Fiber

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Introduction

Under authority of the Food, Drug and Cosmetics Act, the U.S. Food and Drug Administration (FDA) regulations allow the use of pulp from reclaimed fiber in food packaging. These regulations recognize that the sources of reclaimed fiber may be either “*industrial waste from the manufacture of paper and paperboard*” or “*salvage from used paper and paperboard...*” In both cases, the regulations stipulate that the material may not bear or contain “*any poisonous or deleterious substance... that migrates to the food except as provided in the regulations...*”

In 1999, the Recycled Paperboard Technical Association (RPTA) and the American Forest & Paper Association jointly published **A Guidance for Industry on The Use of Pulp from Reclaimed Fiber as a Component of Paper and Paperboard Products for Food Packaging under 21 C.F.R. 176.260**. The Guidance identified steps appropriate to ensure compliance with FDA requirements. To complement the Guidance, RPTA issued the first edition of its *Chemical Testing Protocol for Food Contact Paperboard Made from Recycled Fiber* (RPTA Protocol) as a tool to help manufacturers of recycled paper and paperboard identify substances in recycled paperboard and determine the regulatory status of those substances.

Since then, the RPTA Protocol has evolved into a comprehensive program to ensure that recycled paperboard can be the first choice for food packaging.

The RPTA Comprehensive Program

In July 2012, RPTA rolled out its most recent update of the program to ensure manufacturers of recycled paperboard used in food-contact applications can continue to assure compliance with FDA requirements. The Program has been enhanced to comprehensively address the various regulatory requirements under the FDA statutory authority that apply to recycled paperboard use in food packaging. The Program includes processes to address:

- Control of sources of recovered fiber
- Implementation of a chemical testing protocol
- Implementation of microbiological testing to assure that contamination of the surface of the paperboard is reduced to as low as practicable and the paperboard is free of pathogens
- Implementation of Good Manufacturing Practices which include a variety of processes to assure the manufacturing of the packaging does not render the package unfit for food
- Implementation of quality control end-testing
- Maintenance of adequate company records

RPTA Chemical Testing Protocol

From the beginning, RPTA developed the chemical testing protocol through the collaborative efforts of industry experts, outside consultants, and experts in the area of health-risk assessment. It addresses chemicals that are the subject of FDA regulations for food packaging and California's Proposition 65 with regard to unintentional chemical constituents.

The RPTA Protocol contains a list of chemicals, along with their corresponding health risk-based allowable concentrations. The Protocol establishes a testing regime to evaluate levels of unintended chemical constituents in paperboard and contains information on how to use the test data. In addition, it establishes a process for further evaluations should test results deem additional study is needed.

RPTA selects chemicals for inclusion in the Protocol based on the potential for their presence in recycled fibers because they are common industrial and commercial contaminants. Classes of chemicals contained in the list include:

Heavy Metals
Pesticides
Phthalates
Polyaromatic Hydrocarbons
PCB's
Volatile Organic Compounds
Semi-Volatile Organic Compounds

The list of chemicals contained in the Protocol is not static. Based on information from the U.S. Environmental Protection Agency, FDA, the US Department of Agriculture and other government and quasi-government entities, RPTA periodically revises the list to

include new chemicals which could potentially be found in recycled fiber streams and have potential health effects. In addition, the allowable concentrations are subject to change as new information about any health effects becomes available. RPTA monitors changes to the underlying toxicological data used to develop the allowable concentrations for the chemicals, and updates the information contained in the Protocol as necessary. The RPTA Protocol included in the 2012 Comprehensive Program is the fifth update to the original Protocol document.

Conclusion

The Comprehensive Program for Food-Contact Paperboard Produced from Recycled Fiber is a confidential and proprietary tool that helps RPTA members assess compliance with FDA's requirements for manufacturing food-contact packaging. The RPTA Comprehensive Program is a living document. RPTA draws on the knowledge of recognized experts in the field of risk assessment, authoritative scientific literature, and commonly accepted safety assessment techniques to present a methodology for achieving this purpose.

The Comprehensive Program is a licensed product of RPTA. It is available only to RPTA members and licensees. For information on becoming a RPTA member or licensing the Program please contact Amy Schaffer at (847) 622-2544 or rpta@rpta.org.