



Netherlands Food and Consumer
Product Safety Authority
Ministry of Agriculture,
Nature and Food Quality



Maastricht University

Effect based evaluation of the safety of recycled paper food contact materials

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Overview

1. Introduction
2. Use of food simulants
3. In vitro toxicological assessment
4. Correlation of responses
5. Conclusions

Introduction

01

Recycled food contact materials (FCMs) contain both intentionally (IAS) and non-intentionally added substances (NIAS).

02

11,000 intentionally added substances and 40,000-100,000 NIAS can potentially migrate to food.



DIBP	DEP	BP
DEHP	BHT	PFAS

03

The vast majority of those substances have not been assessed from toxicological perspective. Many NIAS not yet even been identified.

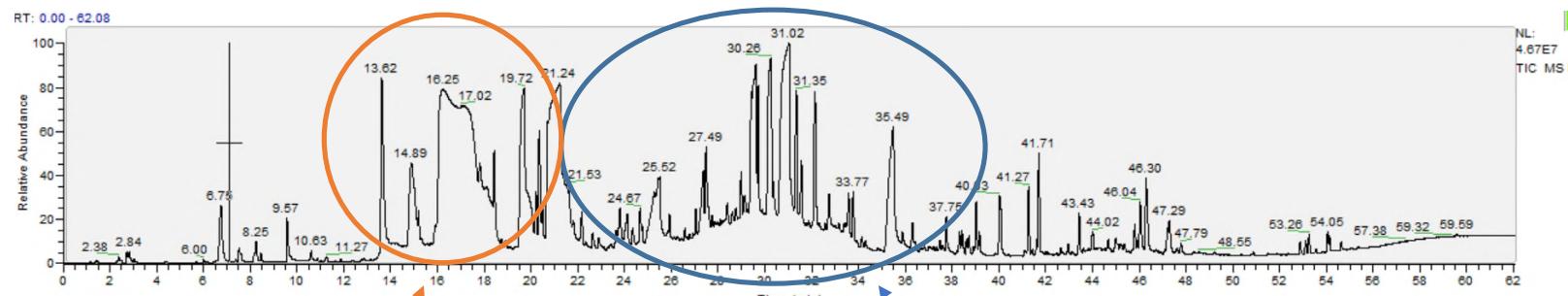
The EU's Paper and Cardboard Risk Assessment: Current State

Major challenges are currently encountered regarding the **commercial use** of paper and board food contact materials (FCMs) due to the:

- **Lack** of harmonized EU regulatory framework.
- **Huge** amounts of **unassessed** food contact chemicals (FCCs).
- Significant **concerns** regarding the chemical safety.
- **Wide variability** in sample preparation and assessment protocols.

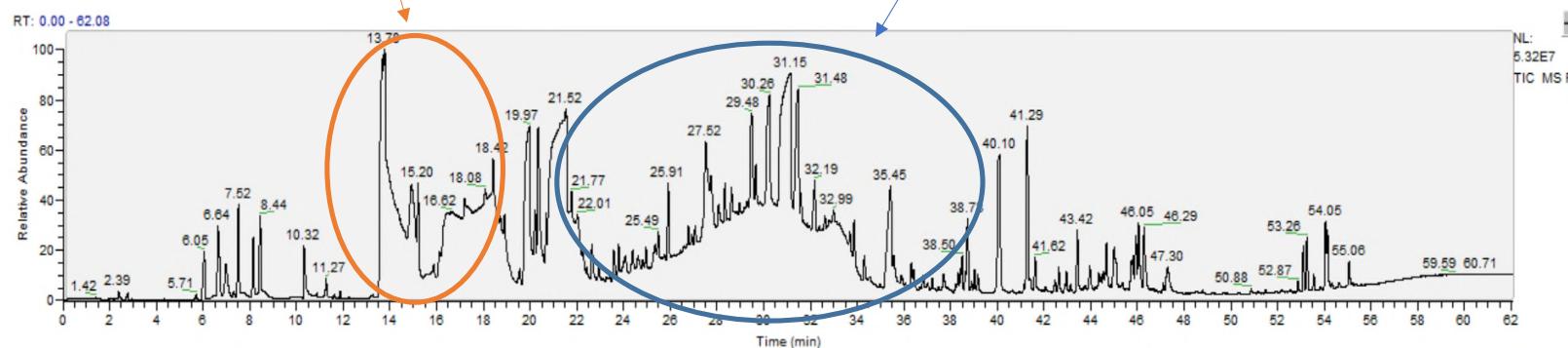
Typical FCMs Chromatograms: Challenges of FCCs Analysis

FCM sample extraction with acidic food simulant



Column overload

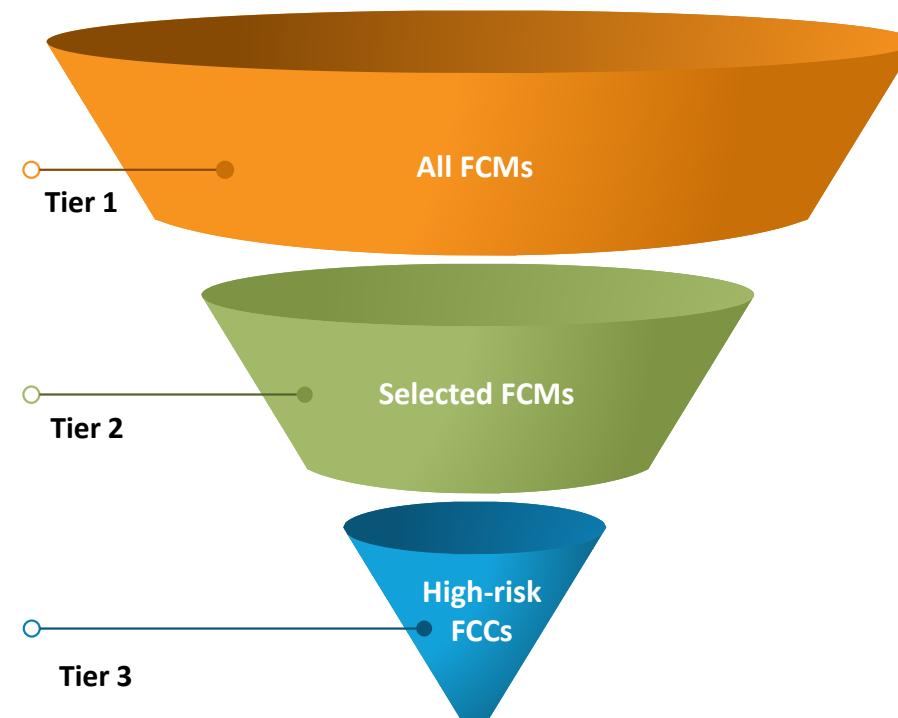
Forest of peaks



FCM sample extraction with THF-Meth-Water

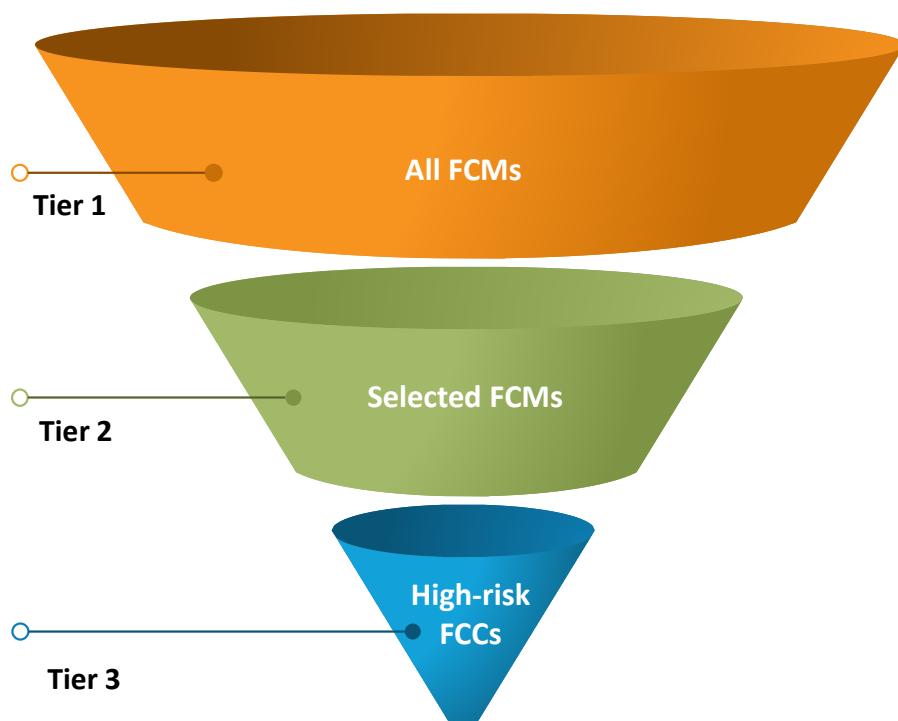
Proposed Approach: Effect based evaluation

From recycled FCMs to high-risk
FCCs: A top-down approach



Proposed Approach: Effect based evaluation

From recycled FCMs to high-risk
FCCs: A top-down approach



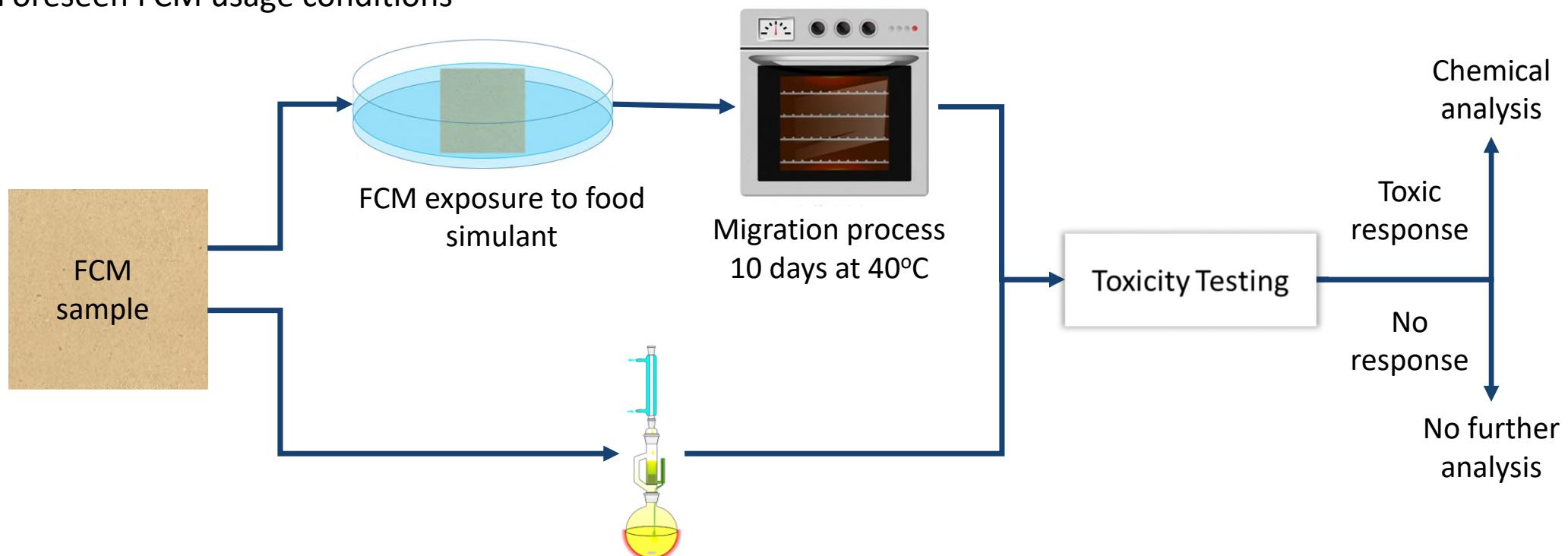
Effect based evaluation, which is a **combined** in vitro bioassays/chemical analysis, provides:

- An **integrated picture** of **total toxicity** of FCMs as affected by all FCCs (including **NIAS** and **mixtures**).
- **High throughput** and **cost-effective**.
- **Many toxicological endpoints** through battery of bioassays
- **Prioritization** of FCCs of higher toxicological potency.

Sample Preparation & Toxicity Testing Workflow

Approach 1: Migration

Foreseen FCM usage conditions



Approach 2: Exhaustive extraction

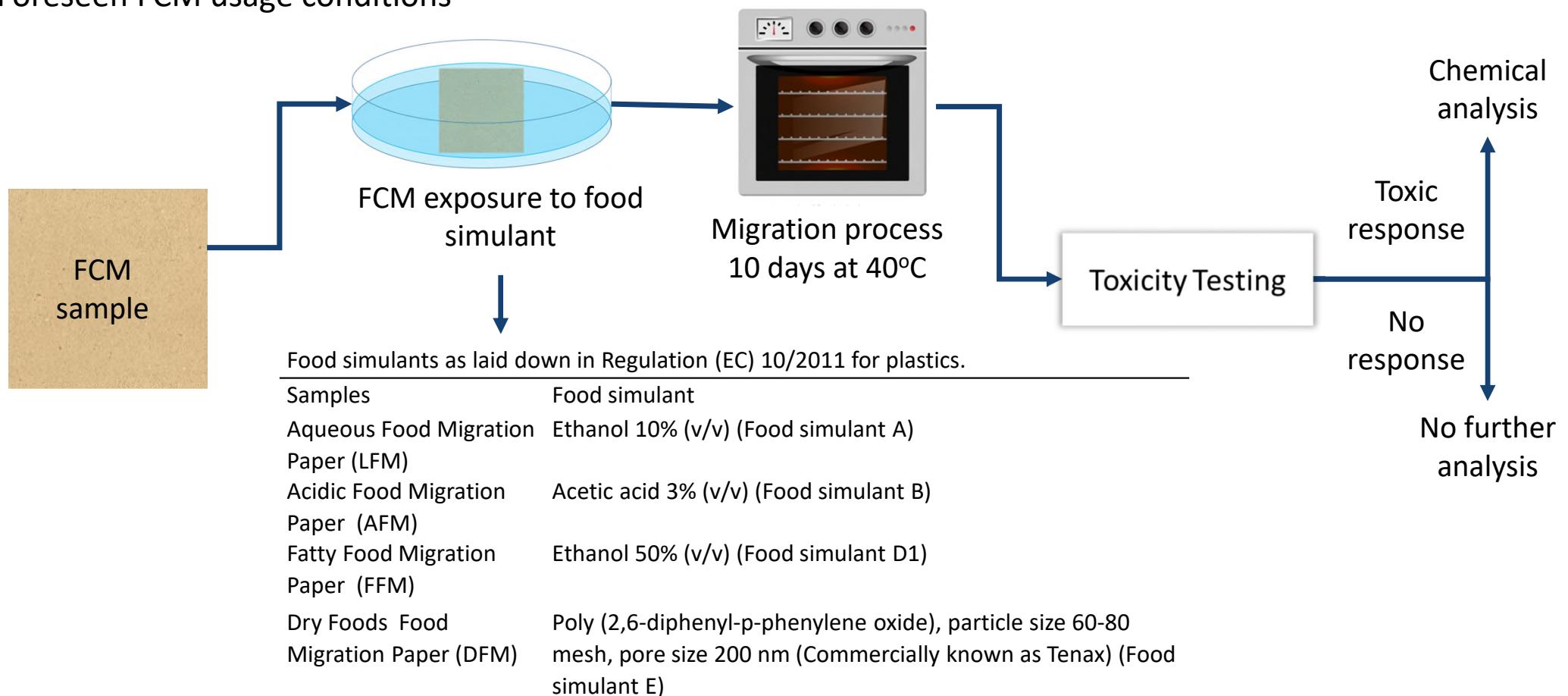
Unforeseen usage conditions

Soxhlet extraction

Sample Preparation & Toxicity Testing Workflow

Approach 1: Migration

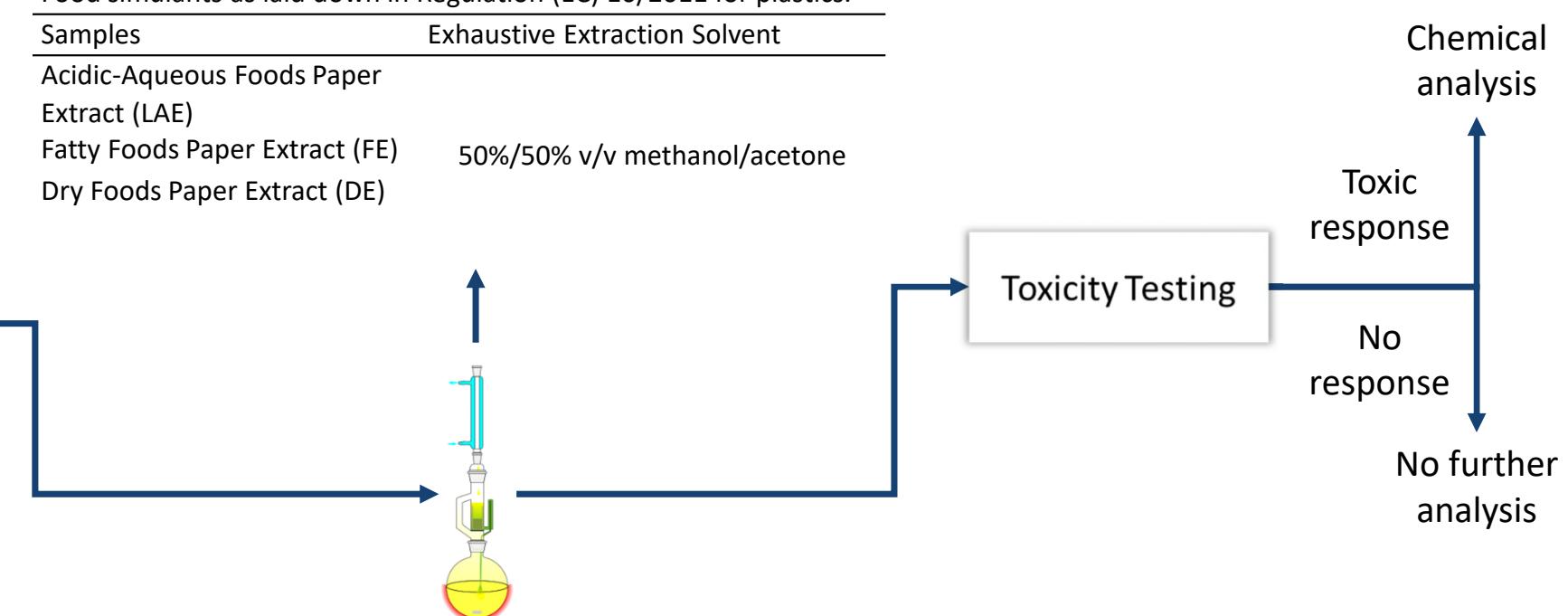
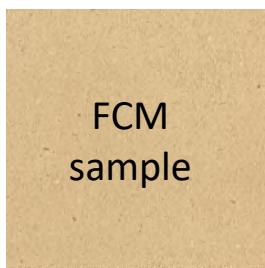
Foreseen FCM usage conditions



Sample Preparation & Toxicity Testing Workflow

Food simulants as laid down in Regulation (EC) 10/2011 for plastics.

Samples	Exhaustive Extraction Solvent
Acidic-Aqueous Foods Paper Extract (LAE)	
Fatty Foods Paper Extract (FE)	50%/50% v/v methanol/acetone
Dry Foods Paper Extract (DE)	



Approach 2: Exhaustive extraction

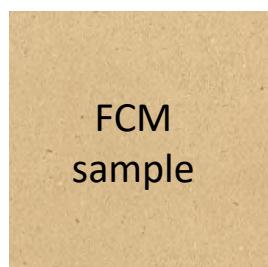
Unforeseen usage conditions

Soxhlet extraction

Sample Preparation & Toxicity Testing Workflow

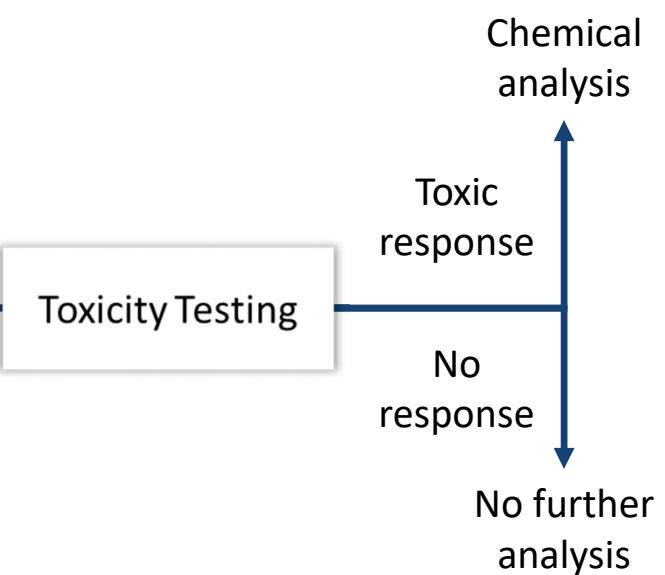
Approach 1: Migration

Foreseen FCM usage conditions



In vitro bioassays involved in the battery.

Cytotoxicity	Genotoxicity	Endocrine disruption	Dioxin like activity
MTT	Ames assay	AR-/Anti-AR-Calux	AhR-/Anti- AhR Calux
LDH	Micronucleus assay Comet assay	ER α -/Anti-ER α -Calux	



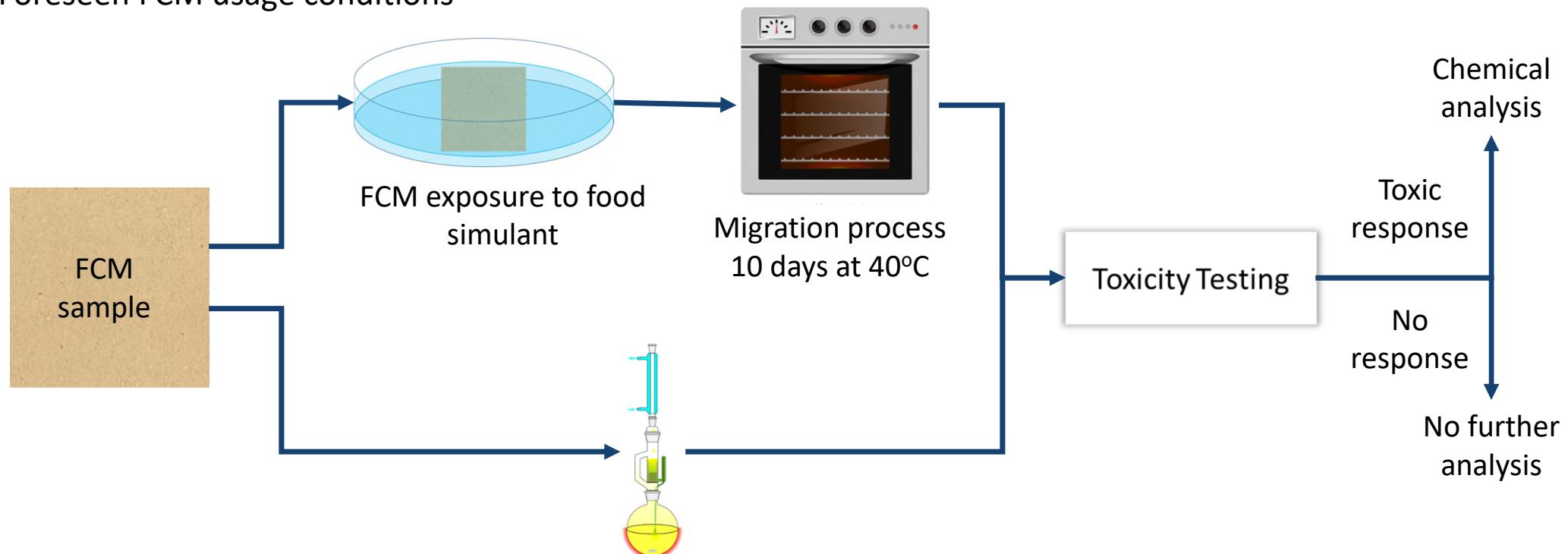
Approach 2: Exhaustive extraction

Unforeseen usage conditions

Sample Preparation & Toxicity Testing Workflow

Approach 1: Migration

Foreseen FCM usage conditions



Approach 2: Exhaustive extraction

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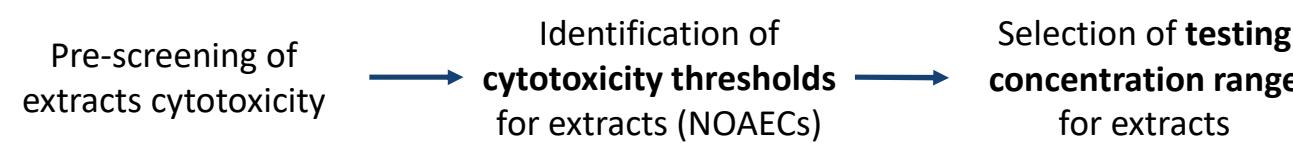
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Screening of FCM samples



Toxicity Testing Workflow

Battery of in vitro bioassays: Testing Procedure



The extracts were tested both in the **absence** and presence of **external metabolizing system (S9)** in all the bioassays.

Mutagenicity and chromosomal aberration testing of extracts:

- Ames test
- In vitro Micronucleus Assay

Androgen receptor (AR), estrogen receptor alpha (ER α) & aryl hydrocarbon receptor (AhR) disrupting testing of extracts:

- AR, ER α , AhR Calux

Summary of toxicity results from extracts

01

Food simulants influenced the ER α
and DR of the extracts

02

The involvement of S9 led to distinct
ER α .

03

No mutagenic and genotoxic effects
were observed via the Ames test, in
vitro micronucleus and modified
comet assay.



Conclusions

01

Sample preparation method, in vitro bioassays and testing conditions should be carefully selected to not interfere with the in vitro toxicological testing.

02

DR shows distinct toxicity compared to ER α and AR

03

The involvement of external metabolizing system (S9) in the testing led to distinct toxicity profiles of the extracts.

- Xenobiotic metabolism should be taken into account as an important factor in hazard identification.**

04

Predicted site of toxicity should guide the selection of relevant biological testing systems (preferably more than one)

05

The current framework does not assess for the presence of EDC

- While genotoxic effects were not identified, EDCs were present in the majority of samples.**