

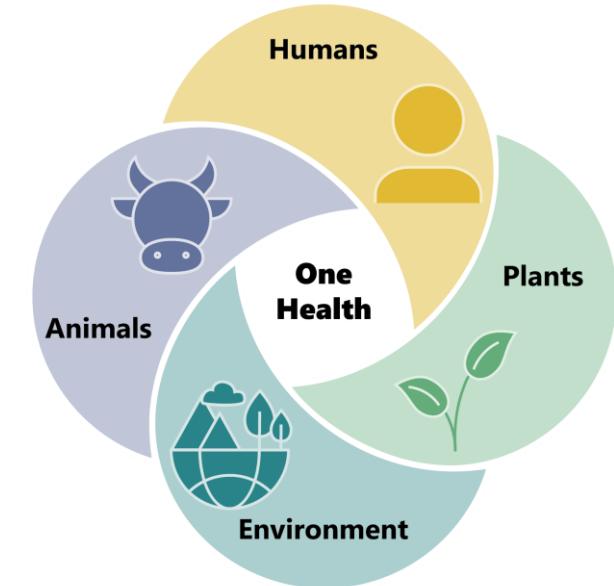
Council of Europe: Technical Guide on Paper and Board

EFSA FCM Network, 12th Meeting 21-23.10.2025



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PAPER AND BOARD

used in food contact
materials
and articles



EDQM
2021



European Directorate
for the Quality
of Medicines
& HealthCare



COUNCIL OF EUROPE
CONSEIL DE L'EUROPE

Part I. Council of Europe Resolution CM/Res (2020) 9 on the safety and quality of materials and articles for contact with food

Adopted by the Committee of Ministers
on 7 October 2020 at the 1385th meeting of the Ministers' Deputies

PAPER AND BOARD USED IN FOOD CONTACT MATERIALS AND ARTICLES

Appendix: Guiding principles for food contact materials and articles

Part II. Technical guide on paper and board used in food contact materials and articles

Contents of Part II

- Scope
- Definitions
- General requirements
- Compliance testing
- Detection of recycled material
- Supporting documentation and DoC
- References
- Further reading

Annex I: References/links to national regulations or recommendations

Annex II: Specific migration limits (SML) for some constituents or conaminants

Annex III: Currently available standard methods for testing compliance

Update of the 1st Edition

- Editorial corrections
- Chapter „Compliance Testing“
 - ✓ Implementation of the JRC Guideline (5th Edition is under preparation, includes a testing scheme for paper and board articles)
 - ✓ Addition of useful standards (Annex III)
(BPA: CEN/TS 17497, PAH: CEN/TS 16621, microbiological examination: ISO 8784-1)
- Annex II: Specific migration limits (SML) for some constituents or contaminants
 - ✓ (New) limits for: Bisphenols, MOAH, Phthalates (allocation factor 10 or 20%), PFAS
 - ✓ New substances: 3-monochloro-1,2-propanediol (3-MCPD), 1,3-dichloro-2-propanediol (1,3-DCP), formaldehyde

Substances which need to be added in Annex II – under discussion



Substance	CAS No.	SML (mg/kg in food/food simulant)	Notes	Reference and explanations
Bisphenol A, Bisphenol S, 4,4-isobutylethylidenediphenol and other hazardous bisphenols and derivatives	80-05-7 80-09-1 6807-17-6 xx-xx-xx	under discussion; to be amended following further developments at EU level	1	Substances acc. Regulation (EU) 2024/3190 Article 2(2)e EFSA Journal doi: 10.2903/j.efsa.2023.6857 TDI of 0.2 ng BPA/kg bw/d

Note 1: Impurities, entry sources may be printing inks, adhesives, organic coatings and recovered fibres

Substances which need to be added in Annex II – under discussion



Substance	CAS No.	SML (mg/kg in food/food simulant)	Notes	Reference and explanations
Mineral oil aromatic hydrocarbons (MOAH)		0.5	1, 2	<p>Joint statement of the Member States regarding the presence of Mineral Oil Aromatic Hydrocarbons (MOAH) in food https://food.ec.europa.eu/document/download/fc82efb9-e180-45ff-8202-3df60ec00fb2_en?filename=cs_contaminants_catalogue_moah_ntfs_js_0.pdf</p> <p>EFSA Journal doi: 10.2903/j.efsa.2023.8215: BMDL10: 0.49 mg/kg bw/d</p>

Note 1: Impurities, entry sources may be printing inks, adhesives, organic coatings and recovered fibres

Note 2: Until a specific migration limit or other restrictions based on the evaluation of the latest available scientific evidence can be established, producers or other operators responsible for the placing on the market of food contact materials and articles are recommended to keep migration of MOH as low as reasonably feasible and to ensure that migration of genotoxic, carcinogenic MOAHs does not occur.

Substances which need to be added in Annex II – under discussion



Substance	CAS No.	SML (mg/kg in food/food simulant)	Notes	Reference and explanations
Phthalates				EFSA Journal 2019;17(12):5838
Di(2-ethylhexyl) phthalate (DEHP)	117-81-7	0.3*	1, 3	*The sum of DBP, DIBP and DEHP, calculated as DEHP equivalents using the equation below, must not exceed 0.3 mg/kg. DBP x 5 + DIBP x 4 + DEHP x 1
Di-n-butyl phthalate (DBP)	84-74-2	0.06*		
Diisobutyl phthalate (DIBP)	84-69-5	0.06*		

Note 1: Impurities, entry sources may be printing inks, adhesives, organic coatings and recovered fibres

Note 3: 10% allocation factor for impurities (instead of 20% for intentional use in plastics)

Substances which need to be added in Annex II – under discussion



Substance	CAS No.	SML (mg/kg in food/food simulant)	Notes	Reference and explanations
Sum of PFOA, PFNA, PFHxS and PFOS		ND (0.00005)	6	EFSA Journal doi: 10.2903/j.efsa.2020.6223 TWI of 4.4 ng/kg bw/week Regulation (EU) 2019/1021
PFCA (C9-C14) and related substances		ND	6	Regulation (EC) No 1907/2006 (REACH) Annex XVII entry 68 25 ppb in the material
PFHxA and related substances		ND	6	Regulation (EC) No 1907/2006 (REACH) Annex XVII entry 79 25 ppb in the material
PFAS (per- and polyfluoroalkyl substances)		—	6	Regulation (EU) 2025/40 sets limits in packaging materials for individual PFAS

ND: Not detectable: unless otherwise specified the LOD should be not higher than 0.01 mg/kg food. These substances must not be intentionally added/used.

Note 6: Restrictions under REACH will apply to one or more of these substances. National restrictions will also apply.

Substances which need to be added in Annex II – under discussion



Substance	CAS No.	SML (mg/kg in food/food simulant)	Notes	Reference and explanations
3-Monochlor-1,2-propandiol (3-MCPD)	96-24-2	0.012		EFSA Journal 2018;16(1):5083 TDI 2 µg/kg bw per day BfR-Empfehlung XXXVI, 01.08.2024
1,3-Dichlor-2-propanol (1,3-DCP)	96-23-1	ND (0.002)		BfR-Empfehlung XXXVI, 01.08.2024
Formaldehyde	50-00-0	6.0	7	BfR Stellungnahme Nr. 046/2019 doi: 10.17590/20191121-072641 https://www.bfr.bund.de/cm/343/gefaesse-aus-melamin-formaldehyd-harz.pdf

Note 7: 20% allocation factor for formaldehyd

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