

FOOD CONTACT CERTIFICATION FOR Clarifoil DIACETATE FILM EUROPEAN AND USA FDA REGULATIONS

Clarifoil hereby certifies that P20 and P27 grades of Clarifoil cellulose diacetate film are suitable for use in contact with foodstuffs. These grades of film comply with EEC Plastics Directive 2002/72/EC and all subsequent amendments up to 2007/19/EC. They also meet the requirements of the UK enactment of this directive, Statutory Instrument No. 205, The Plastic Materials and Articles in Contact with Food Regulations, 2009. All monomers and starting substances used to produce this grade of film appear this directive and are not restricted.

In addition, P20 Clarifoil films comply with the food contact regulations in Germany as published by BfR, § 2, Para. 6, No. 1 of the Food and Feed Code (LFGB). Regarding the migration of substances to foods from consumer goods that come into contact with food, the LFGB refers to Article 3, para 1 of the EC Regulation 1935/2004 on materials and articles intended to come into contact with food.

P20 film is also produced in accordance with the recommendations of the BVV XXVI for cellulose acetate films for food contact use.

Listed below are the relevant sections of the Code of Federal Regulations (CFR), which we understand are applicable to the use of Clarifoil films where FDA requirements must be met.

Title 21 of the CFR (revised 1st April 2008), cites the following:-

The use of cellulose acetate in paper and paperboard products is generally recognised as safe (GRAS) as in Part 182.90. Cellulose acetate may also be used as a component of coatings (Part 175,300). Other components are covered in sections 175.105, 172.480, 172.860, 184, 1005, 184.1090, 182.1711 (multiple purpose GRAS food substances).

The only plasticiser contained in food grade Clarifoil is specifically cited in Parts 175.300, 175.320 and 181.127

In summary, the constituents of Clarifoil cellulose acetate are, to the best of our knowledge, either prior sanctioned as a food wrapping or GRAS as a food additive in the USA by the FDA.

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