



To whom it may concern

Machinery for the manufacture of food contact materials, folder gluer belts

Materials and articles coming into contact with food must fulfil specific requirements with regard to purity and migration behaviour of individual substances. In the European Union detailed regulations apply at EU and national levels. In the USA "indirect food additives" resulting from food contact materials and articles are regulated by FDA.

In the EU the framework Regulation (EC) 1935/2004 covers the general requirements applying to food contact materials and provides the definition of food contact materials and articles in Article 1: "materials and articles which in their finished state (a) are intended to be brought into contact with food; or (b) are already in contact with food and were intended for that purpose; or (c) can reasonably be expected to be brought into contact with food or to transfer their constituents to food under normal or foreseeable conditions of use." The definition is repeated in Regulation (EU) 10/2011 on plastic materials and articles intended to come into contact with food.

In the USA a food contact substance is defined as "any substance intended for use as a component of materials used in manufacturing, packing, packaging, transporting, or holding food if such use is not intended to have a technical effect in such food" according to the Food, Drug & Cosmetic Act.

From these definitions it results that machinery used in the manufacture of food contact materials and articles does not fall under the regulations applying to food contact materials because there is no contact of such machinery with food *. Accordingly, also parts of such machinery like folder gluer belts and other conveyor belts need not to comply with any food contact material regulations. Compliance of e.g. folder gluer belts with food contact regulations does not add safety to the packaged food and any such hint is misleading.

In conclusion, all technically suitable materials may be used in the manufacture of folder gluer belts and other belts not having direct contact with food. No safety concern is expected when such belts are used in machinery for the manufacture of food packaging material.

* Based on the fast production process of packaging materials the contact time between parts of the machinery and the packaging material will be very short. Additionally, all materials processed are dry. Thus, transfer of any constituents from the belt material to the packaging material is negligible.

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