

RECYCLED CONTENT IN FOOD CONTACT MATERIALS









What are the regulations in Asia?



Many countries in the region do not have regulations that pertain to the use of recycled content for food application, while some have specific restrictions on its usage (e.g. Thailand). Key challenges on the use of recycled content include meeting food safety and religious standards (such as Halal standards), and the removal of blanket regulations that limit usage of all recycled material in food-grade applications. Currently, there is no harmonised standards for Food Contact Materials (FCM) in Asia, including the use of recycled content.

Food Industry Asia is working to create an Asian FCM network and platform that aims to standardise a regulatory framework across Asia and to evaluate and approve FCM through consultations with government agencies and industry stakeholders.

ASIA AT A GLANCE

Recycled Content in FCM	Countries
Use of certain recycled content allowed for FCM	 
Restrictive regulation(s) for FCM	 
No provision	   

CHINA

Food contact materials (FCMs) in China are regulated under the China Food Safety Law. The current Food Safety Law prohibits the importation, use or purchase of food-related products (e.g., food additive, food packaging materials) that are not in compliance with the applicable Chinese Food Safety Standards. The mandatory national standards (GB standards) for food contact materials and articles includes GB 4806.1 (general safety requirements), GB9685 (use of additives), GB 4806.6 (plastic resins), GB 4806.7 (plastics), etc.

For recycled materials intended to be used for food contact, a petition process for every single case is necessary.

INDONESIA

Packaging is regulated under the Food Act of 1996 which mandates the use of safe materials for food packaging. Under the Act, the government can identify forbidden packaging materials and methods for packaging certain foods. Packaging material where effects on human health are not known, cannot be used before being checked for safety. According to Article 67 Halal Products Law, full mandatory Halal certification for all food and beverages products must commence from 17 October 2019 to 17 October 2024.

All food packaging which use recycled materials shall comply with Regulation No. 20 of 2019 on Food Packaging, particularly on Article 10. Materials that are not covered under the above regulation may be used for packing food only after receiving approval from the Indonesia National Agency of Drug and Food Control (BPOM).

MALAYSIA

Food packaging materials in Malaysia are regulated under the Food Act of 1983. Malaysia prohibits the use of recycled packaging for certain foods such as sugar, flour, and edible oil. In addition, packaging for a product / packaging of swine-origin shall not be used for food of non-swine origin and any bottle that has previously been used for alcoholic beverage or shandy shall not be used for any food, other than alcoholic beverage and shandy. Lastly, reuse of packaging material previously used for milk, soft drink, alcoholic beverage or shandy, vegetable, fish or fruit, and polished rice, is prohibited.

PHILIPPINES

Food packaging materials are generally regulated by the Food and Drug Administration (FDA) and the regulations fall under the Food Safety Act of 2013. Generally, the restriction on packaging is on setting mandatory food safety standards. There is currently no provision on the use of recycled content for food application in the Philippines. Generally, Philippines accept food-contact materials compliant with either the US FDA or covered by the Japanese Food Sanitation Law.

SINGAPORE

Singapore's G.N. No. S 59/2019 – Food (Amendment) Regulations 2019 Part III, Art. 37 outlines the regulations with respect to food packaging which prohibits usage of food packaging containing heavy metals or other carcinogenic, mutagenic, teratogenic, poisonous or injurious substance. There is currently no provision on the use of recycled content for food application in Singapore.

SOUTH KOREA

In South Korea, the use of recycled synthetic resins for direct food contact applications is allowed, if the resins are poly(ethyleneterephthalate)(PET) or poly(ethylenenaphthalate)(PEN) that are decomposed into raw materials by heating, chemical reactions and etc., and then polymerized after purification.

A recent revision in February 2020 **allows** other recycled plastics including mechanically recycled plastics to be used in indirect food packaging so long as there is no risk of harmful substance migration into food.

THAILAND

Thailand's Notification of the Ministry of Public Health (No. 295) B.E. 2548 (2005) prohibits the use of plastic containers made from reused plastic exempt using for packing fruits with peel.

Currently, the Thai Food and Drug Administration (FDA) is considering updating the country's regulations on plastic FCM to permit the use of recycled plastic in contact with food. As part of that review, the Thai FDA has requested information on chemicals used in the manufacture of certain plastic FCMs, focusing on FCM composed of recycled polyethylene terephthalate (PET) and high-density polyethylene (HDPE).

VIETNAM

Vietnam's food plastic packaging requirements do not specifically limit the use of recycled content as long as the criteria covered in the food packaging regulations as stated in are covered under QCVN 12-1:2011/BYT.

ANALYSIS

Policies and standards governing the use and application of recycled content can positively support the end-use market for packaging. However, currently there is a lack of clarity with regards to food application recycled content standards in the region, given that many countries have no provision provided.

Given the role of food-grade recycled content in enabling circularity, and the commitment by packaging and FMCG companies to use recycled materials in food packaging, it is crucial for governments in Asia to provide supportive and clear policies and standards with regards to recycled content for food applications.

Food Industry Asia (FIA) plans to collaborate with the industry and government agencies to set up a FCM platform to share best practices and to evaluate approvals of recycled materials for FCM. The platform also seek to establish deeper regulatory relationship between North Asia (which have more developed regulations) and

Southeast Asia (which are more emerging), and builds a formal and transparent platform for discussion of protocols and standards not just within Asia, but inviting and involving EU & US FDAs.

FIA/industry collaboration will kick-start through partnering the Thai Food and Drug Administration (FDA) and China's Inspection & Quarantine Technology Centre (IQTC) to host a forum bringing together Asian FCM regulators and the food & beverage industry.

**This report is prepared by the FIA
Sustainability team. Should you
have any questions, please
contact:**

Edwin Seah
Head of Sustainability
edwin.seah@foodindustry.asia
33 Mohamed Sultan Road, #03-02
Singapore 238977
T. +65 6235 3854

Lee Wei Yang
Sustainability Manager
weiyang.lee@foodindustry.asia
33 Mohamed Sultan Road, #03-02
Singapore 238977
T. +65 6235 3854

200428