



European Plasticised PVC
Film Manufacturers' Association

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COPY

Prof. Dr. A. Hildebrandt
Bundesgesundheitsamt
Postfach 330013
D-1000 Berlin 33
West Germany

10th May, 1985

Dear Professor Hildebrandt,

Flexible PVC Sheets

We refer to your letter of 21st January, in which you give advance notice of intention to withdraw the recommendation of flexible PVC sheets for the packaging of fresh meat. We would strongly urge you to reconsider this proposal for the following reasons:

First, with regard to the alleged disadvantage of PVC in transferring plasticiser to meat. Dr. Rudt has reported (Hamburg Conference on Migration, November 1983) that the total migration of plasticiser from this type of wrapping into all foods, even with safe assumptions, is only 1.5 gms per person per year. This is obviously a perfectly safe quantity where approved plasticisers are concerned. Indeed, the Council of Europe's recommendations (agreed by the German representative) give for such plasticisers specific migration limits into food of 60 mg/kg. This is the same limit agreed between us and currently incorporated in BGA recommendations. The migration of plasticisers into meat from PVC films is below this figure.

Second, we would urge that, while other films could be used for wrapping meat, they suffer from many disadvantages, some of which are listed below:

- (i) Inferior meat keeping because of lower moisture vapour transmission. This in practice limits the loading of trays thus increasing cost.
- (ii) Inferior machinability and costs of adapting packaging machines.
- (iii) Inferior cling and heat seal.
- (iv) Inferior clarity and antifog properties.
- (v) Inferior elastic recovery and puncture resistance.

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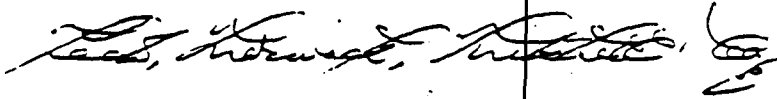
As previously suggested in our discussions, we believe the opinions of the users should be obtained before a final decision is taken.

... We are enclosing the report from NATEC, and a covering letter which elaborates on the first point above.

Third, we draw your attention to the illogicality of banning one product because another is alleged to be satisfactory, and the undesirability of taking unilateral action at a time when the EEC is working on harmonising legislation. Germany is at present the only Common Market Country proposing a ban on PVC film for meat wrapping. We believe such action would be contrary to Article 30 of the Treaty of Rome (e.g. Cassis de Dijon Judgment).

We suggest it would be helpful in resolving these matters for us to have a further meeting.

Yours faithfully,



Secretaries