

NOUS ALLONS INFORMER

ET RETABLIR L'OBJECTIVITE

Information des journalistes

*Le GECOM ne laisse rien passer
et redresse les erreurs*

Un service de réponses systématiques lit tous les matins toute la presse, écoute les radios... et dans les 24 heures écrit à tous les auteurs d'informations discutables ; pour redresser, courtoisement mais fermement, leurs erreurs, et leur donner des informations véridiques, en demandant si besoin est l'insertion de rectificatifs.

*Le GECOM informe
objectivement les informateurs*

Un dossier de base a été établi et diffusé à 2000 exemplaires :
En 44 pages ce dossier fait le point sur les principaux problèmes :

SANTE = démonstration de l'innocuité du PVC appuyée sur des travaux scientifiques sérieux.

POLLUTION = mise en valeur des actions entreprises pour l'industrie pour récupérer et recycler les bouteilles plastiques.

ENERGIE = bilan énergétique comparé des bouteilles en matières plastiques et en autres matériaux.

*Le GECOM instaure un dialogue
et des discussions*

Des réunions de presse sont organisées :

- le 16 Avril, avec les journalistes ayant déjà eu l'occasion d'écrire à son sujet,
- le 29 Avril, avec la presse médicale, scientifique et de l'environnement
- le 13 Mai, avec la presse économique
- le 21 Mai, avec la presse féminine
- le 29 Mai, avec la presse de la distribution.

Ces réunions permettent de connaître les préoccupations des journalistes, d'y répondre et de discuter. Déjà le GECOM est connu et les journalistes commencent à s'adresser à lui pour s'informer ou contrôler leurs informations.

Information de l'opinion publique

- Une série de témoignages sur R.T.L. et R.M.C. :
entre le 1er Avril et le 20 Juin.

24 messages auront été diffusés sur chaque antenne aux bonnes heures d'écoute ménagère ou générale. En une minute et demie, un témoignage de toxicologue, de techniciens, de ménagères ou de spécialiste de l'environnement etc..... vient informer le consommateur

*de l'action sur les journalistes,
le GECOM s'adresse directement
aux consommateurs*

sur Europe 1

Par exemple dans "Expliquez-vous sur Europe 1" une discussion sur la récupération et le recyclage a déclenché un grand courant d'intérêt et a été suivi d'un reportage à Rouen et au Havre.

• D'autres débats sont prévus sur RADIO-FRANCE

LA GRANDE PRESSE :

FRANCE-SOIR et ELLE - Un journal et une revue de grande audience : 1 900 000 lecteurs pour FRANCE-SOIR 3 300 000 pour ELLE vont publier en juin, une série d'articles basés sur une enquête auprès des consommateurs et apportant des réponses aux opinions qu'ils ont exprimés, aux préoccupations qu'ils manifestent.

La T.V.

Une action est prévue dont les modalités sont à l'étude qui mettra en évidence les aspects pratiques : légèreté, sécurité de la bouteille plastique.

Information vers les milieux officiels

*Le GECOM apporte des éléments
de réflexion et d'information
à ceux qui ont des textes à élaborer*

Un livre blanc va être adressé aux parlementaires et aux fonctionnaires des administrations concernées, pour les informer de toutes les données du problème et sur les conséquences des décisions qu'ils peuvent être amenés à élaborer.

Aux données du dossier de base seront ajoutés des études sur les aspects économiques et sociaux de nos industries et les rapports scientifiques sur la question.

En conclusion

Le GECOM, se devait de vous informer sur l'action entreprise. Il vous informera de la même façon de ses développements futurs.

Persuadé que vous apprécierez cette action qui nous concerne tous, il vous remercie de vous y associer en la faisant connaître et en nous informant de tout ce que vous pourriez apprendre qui pourrait nous aider.

SPI23292

Present:

Mr J-C Thomas - Rhone Poulenc	-	Chairman of French VCM Committee
Dr W Kamm - BASF	-	Harmonization of Food Packaging Regulations and Related Affairs
Dr H A Van Vucht - DSM	-	Toxicology of Plastics and Related Problems BIT Analytical Group
Dr B List - Lonza	-	Environmental Problems
Mr Nielsen - Norsk-Hydro	-	Technical Service Manager BIT Packaging Group
Mr J Bystedt - Kemanord	-	VCM Question - Packaging
Mr Garland - Montedison	-	Environment and Standards
Mr H M Clayton - BIP PVC Division	-	Convenor of CIA VCM Committee Customer Liaison Sub-Group. (In place of Mr Stafford, ICI).

Absent:

Mr Berthollet - Solvay (Belgium).
Secretary Mr Scarchilli (CEFIC) in place of Mr Garnett.

Meeting No. 1 (a.m.)

SPI23293

Mr J-C Thomas presided.

Background to meeting was discussed by J-C Thomas. Recent CEFIC VCM Committee Meeting in Munich had requested formation of the present Committee to deal with the results of moves towards EEC Regulation.

On November 25th there would be a meeting of the EEC Consultative Committee on Foodstuffs and it was important that industry views should be made known to balance the inevitable political pressures. Dr Kamm and Mr Rodeyns (President of BIT Working Group on Packaging) were Consultative Committee Members chosen from industry.

The Main CEFIC VCM Committee had posed the following tasks:-

- (1) Collection of all available Technical/Commercial information relevant to the problem.
- (2) Collection of National Laws, Directives, Standards etc., already enforced or proposed.
- (3) Collect data on Technical Aspects/Toxicological Studies etc.
- (4) Prepare common arguments to defend if necessary PVC in food packaging.

J-C Thomas envisaged frequent meetings initially - say monthly until year end in order to hasten progress to an EEC Directive. Thereafter some reduction in frequency of meetings was envisaged.

The various delegates were asked to comment on the situation in their countries.

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(1) Dr Kann (Germany)

Dr Kann started by presenting copies of the latest VKE Publication VC/PVC: Beispiel einer Problemlösung (VC/PVC: Example of a Solution of a Problem).

He then reported a conversation with Rossi the previous week when three questions had been posed by Rossi:-

- (1) What kind of foodstuffs are packaged in PVC?
- (2) How much VCM remains in the packaging used?
- (3) How does industry envisage regulations concerning packaged food and containers?

The situation in Germany was described as 'open'. The Kunststoffkommission recognised that its earlier pronouncement (1 mgm per Kg daily intake of food is safe) was no longer politically acceptable. Another meeting was taking place in October and Dr Kann would give a full report to the next CEFIC Ad Hoc Committee Meeting in Brussels. (Note: The KK is part of the BGA).

Main markets: Oils, fats, vinegar. No precise data on usage, however, foil predominated.

(2) Dr Van Vucht (Holland)

The Inspector of Public Health had written to the Food Control Laboratories stating that migration from PVC into the food contents of packages should not exceed 50 micrograms/6 square decimetres (equivalent to 50 ppb maximum in the food). So far where limit was exceeded, the food had simply been returned to the manufacturer, although powers of prosecution existed.

Van Vucht had had sight of a highly confidential letter from the Office of the Inspector of Public Health which concluded as a result of studies conducted on PVC bottles containing acetic acid, that the above requirements could be met from bottles containing a maximum of 11 ppm residual VCM.

Foils accounted for most packaging in Holland. Unable to give precise figures.

(3) Mr Clayton (UK)

* Resume of results of voluntary stepwise reduction in VCM levels given - 10 ppm maximum quoted for foils, most results currently below 5 ppm, 5 ppm maximum quoted for bottles but most results less than 1 ppm. Discussed results of retail outlet survey with undetectable levels in the majority of contents. Migration studies and partition coefficient derived therefrom described (enthusiastically supported by J-C Thomas and Dr Van Vucht - See Appendix 1). UK industry views on prior control rather than retrospective survey of contents described. 15-18000 tonnes bottles, 12000 tonnes foil (6000 tonnes copolymer with special problems).

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(4) Mr Bystedt (Sweden)

Kemanord guarantee 5 ppm maximum in bottle compounds. Rigid foil is made to 1 ppm maximum (used for margarine). Legislation lays down 50 ppb maximum in food. Recent discussions between regulating authorities and industry led to suggestions of 2 ppb maximum by

.....the Government. Mostly contacted by industry, but agreed that 50 ppb might be possible. From January 1st 1977, resins with more than 10 ppm residual VCM must be labelled with CSHA type warning signs.

10-15% of all PVC used in Sweden goes into packaging. Main outlets are fats (margarine and butter) beer, fruit squash, syrups, some edible oil, chocolate.

(5) Mr. Nielsen (Norway)

No VCM legislation. There is a general food law. In general Norway looks to Sweden for a lead. When Sweden introduced the 50 ppb limit on July 1st, 1975 Norwegian food manufacturers tried to meet the requirements. Norsk Hydro started migration studies in late 1973 with bottles containing 100-200 ppm VCM. Less than 10% migrated into the food. Storage trials showed that one could calculate the 12 months equilibrium level. Calculations showed that 5 ppm maximum would allow 50 ppb to be met without difficulty. Norsk Hydro guarantee 5 ppm maximum in bottle compounds. Do not calendar, but homopolymer foil made in Norway has less than 1 ppm. Products packaged are mainly squashes, some vinegar and oil; also margarine and butter.

10-15% of all PVC used in Norway goes into packaging.

(6) Mr J-C Thomas (France)

Prefaced his remarks by saying that 0.05 mgm/kilo sounds better than 50 ppb and should be employed in future - meeting agreed.

Currently 120000 tonnes/year of PVC used in rigid packaging of food - 100000 tonnes for water, 10,000 tonnes for wine.

The directive of July 1975 poses its maximum of 0.05 mgm/kilo in food - it is not related to a specified analytical procedure. GECON have just produced a "white book" on subject of packaging. Has been circulated to Government Ministers, Deputies etc. More copies for wider circulation will be available in approximately 2 weeks time.

The meeting then discussed the three questions posed by Rossi to Kamm. Question 1 was easily answered - all types of food.

Question 2 produced much debate. Summarized, all present wanted prospective control of the container. The UK, Holland and France strongly argued that levels of VCM in contents reached a predictable equilibrium. Germany disagreed supported by Sweden; Switzerland produced some theoretical extraction studies - See Appendix 2. (J-C Thomas mentioned evidence from studies on mineral water in bottles that VCM oxidizes in the container contents on prolonged storage). Garlanda of Italy joined the meeting late, but again supported the UK, Dutch and French position on predictability.

All agreed that if necessary 0.05 mgm/kilo maximum in food could be accepted as an alternative. 5 ppm in containers was considered acceptable, notwithstanding the UK problem with copolymers - it was expected that the delay in full implementation of any directive would allow sufficient time to get levels below 5 ppm.

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Karr proposed a compromise based on F and DA already under consideration by the EEC for permissive migration limit in packaging. Two requirements are stipulated:-

- (a) A maximum permitted concentration of gas additive in the container.
- (b) A maximum migration into the container contents.

Only one requirement has to be met. Under Karr's proposals, the requirement would be 5 ppm in the container or 0.05 mgm/Kg in the contents. This was accepted enthusiastically.

With regard to Rossi's third question, all member countries used variations of the headspace method of gas chromatography. It was arranged therefore that delegates should submit details of the methods used to the Committee Secretary together with any relevant comments.

Meeting No. 2 (p.m.)

Mr Rossi joined the meeting. The meeting was conducted entirely in French with pauses for translation and occasional polyglot consultation. The principal points arising were:-

- (1) DGVI is under pressure due to public opinion and recent F and DA proposals. The European Parliament has already put questions on the use of PVC in food packaging. Rossi would like help from CEFIC and other organisations to answer such questions.
- (2) Rossi is constrained by the Report of the Scientific Committee (Report 27/6/75 - Document 2630/V1/75 - F). In particular he referred to points 3 and 4 of the Conclusions and Recommendations.
- (3) Rossi had not read the full F and DA proposal only the preliminary announcement with word "ban". This had obviously affected his thinking. The precise text of the proposals was made clear, i.e. withdrawal of prior sanction and the implications of the proposal.
- (4) Rossi had the choice of a Directive (binding) or a Recommendation (non binding).
- (5) There was much discussion on control techniques. Rossi appreciated the points made and emphasised that the recommendation to use a method sensitive to 0.001-0.002 mg/kg did not necessarily imply control to that level. It was pointed out in return that the "non-detectable" concept inevitably led to using a "go-no go" test of increasing sensitivity as analytical methods improved.
- (6) Rossi explained that there could be a control on the limit permitted in a package coupled with a limit in food - this could restrict the range of foods permitted to be packed in PVC. He did not think Karr's proposals (an either or situation) would be possible.
- (7) Rossi thought that gas chromatography would be the analytical method used for regulation purposes.
- (8) It is unlikely that the Scientific Committee report will be published in the near future.

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- (9) Rossi, on 11.1.75, of the above report was contacted. Rossi, on 11.1.75, of VCM levels in foodstuffs of the work in Italy and possible equilibrium levels in food and Rossi appeared to accept the view.
- (10) In conclusion Rossi posed seven questions:
- 10.1 What PVC resins and copolymers of PVC are involved in food packaging?
 - 10.2 What are the different types of package involved?
 - 10.3 What different kinds of foodstuffs are involved?
 - 10.4 What are the conditions of contact - temperature, storage time, closeness of contact etc.?
 - 10.5 What migration data is available?
 - 10.6 What are the residual VCM levels in the PVC resins used and in the packaging made from them?
 - 10.7 What analytical methods are used for analysing food and PVC packaging for VCM?

It was agreed that there would be another meeting of the Ad Hoc Committee on November 13th (10 a.m. Westbury) to discuss the data presented. This would be followed on November 14th by a small delegation meeting Rossi.

Distribution:

Mr A W Barnes	(4)	} ICI	Mr B N P Hutchesson	(15)	- CIA
Mr Stafford	(4)		Mr E J Hoskins		- BP
Mr P Raffield			Mr D M Jonas		- Vinatex
Mr T W Moffitt			Mr P B Bartlett	(6)	- BDF

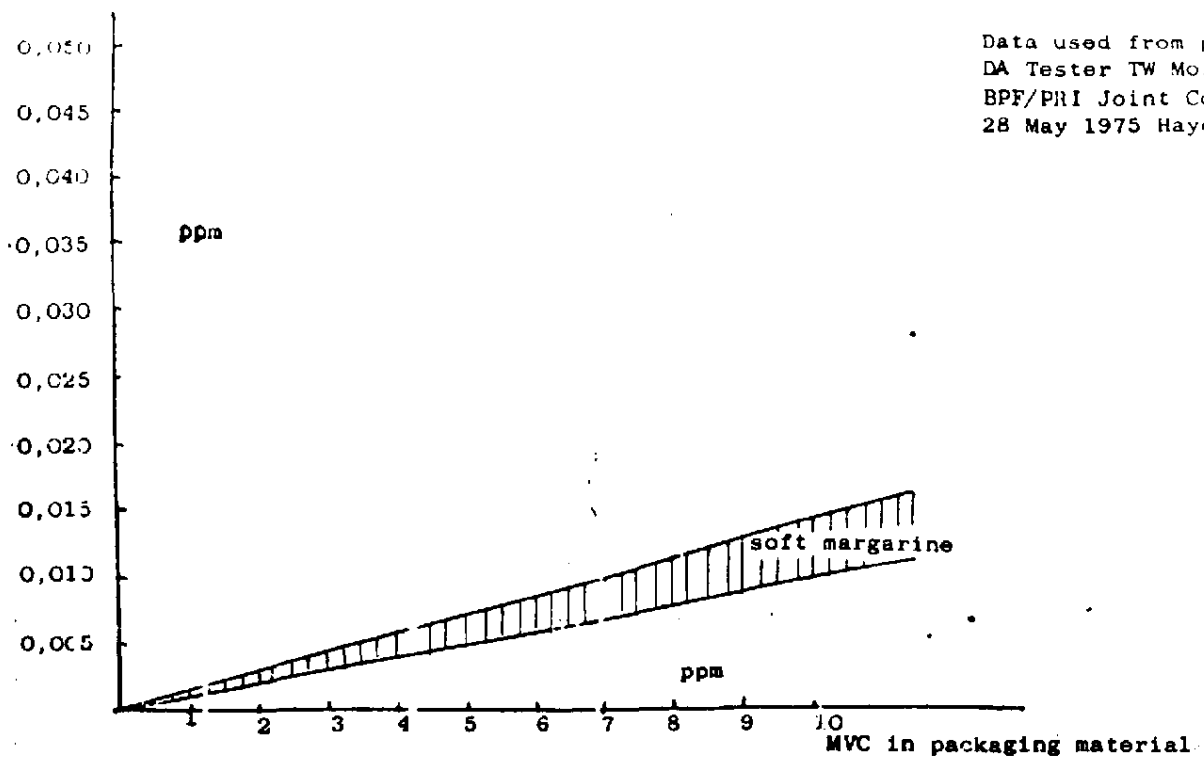
WVC: RMI/DM: TMI: PL: RGM/JMP/PJC: HMC: (6)

H M CLAYTON

SPI23297

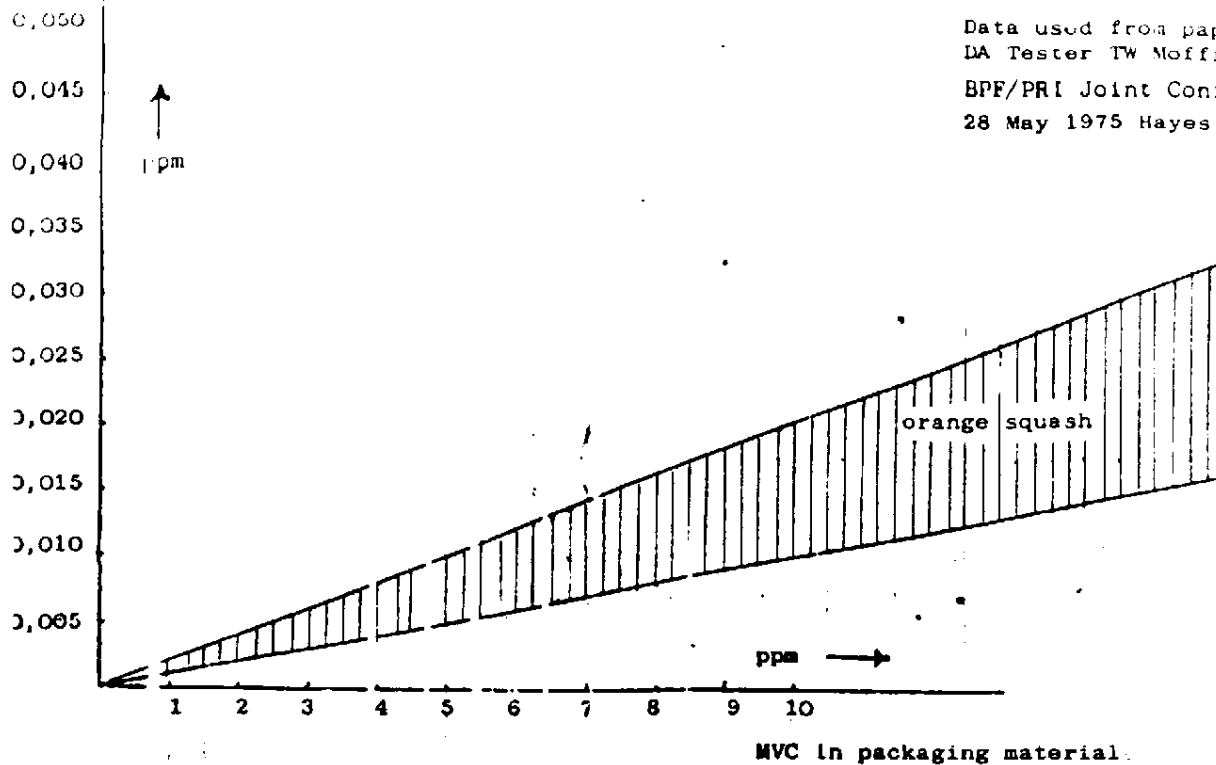
HMC/DAS
8.10.75.

MVC in Food, (long storage periods at roomtemperature)

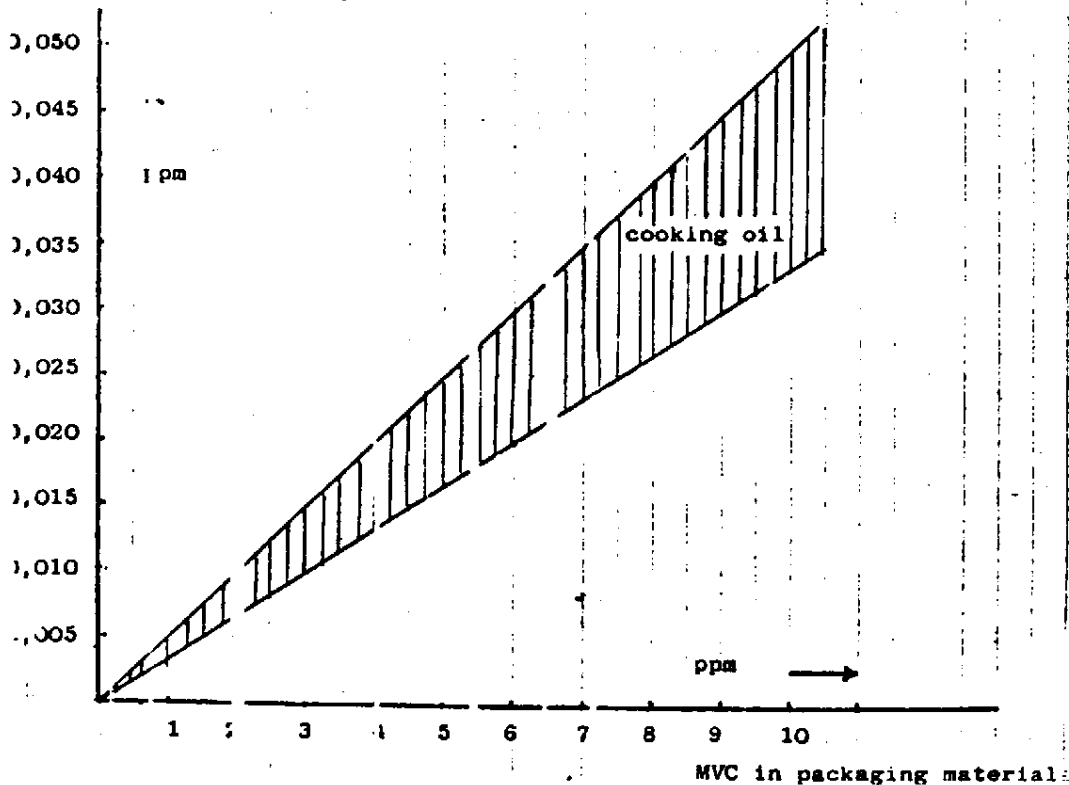


SPI23298

MVC in food (long storage periods at room temperature)



MVC in food (long storage periods at room temperature)



SPI23299

SPI23300

VC-GEHALT IM FÜLLGUT IN ABHÄNGIGKEIT VOM VC-GEHALT IM PVC
ANNAHME: 50% DES IM PVC VORHANDENEN VC MIGRIERT INS FÜLLGUT. PVC-VERPACKUNGSGEWICHT: FÜLLGEWICHT

