



## Germany Proposes to Restrict MOAH in Food Contact Recycled Paper and Board

The World Trade Organization (WTO) announced a draft regulation in Germany which proposes to amend its national Consumer Goods Ordinance (BedGgstV) to establish provisions to minimise the transfer of mineral oil aromatic hydrocarbons (MOAH) from materials and articles in contact with food made from recycled paper and board.

### Definition

The draft regulation has included below new definition:

- Waste paper pulp:
  - fibre material obtained from waste paper through processing methods for the manufacture of paper, paperboard or cardboard
- Aromatic mineral oil hydrocarbons (MOAH):
  - alkylated aromatic hydrocarbons with carbon numbers C16 to C35 which contain one or more rings, with the exception of diisopropylnaphthalenes
- Functional barriers:
  - one or more layers or coatings of a food contact material or
  - the wrapping of a foodstuff,
 which ensures that certain substances from food contact materials do not migrate to the food
- Food simulant:
  - Food simulant as defined by Article 3(12) of Regulation (EU) No 10/2011

### Requirement

Food contact materials made of paper, paperboard or cardboard using recycled paper may only be manufactured and placed on the market if a functional barrier in accordance ensures that no aromatic mineral oil hydrocarbons (MOAH) are transferred from the food contact materials to the food.

A transfer is deemed not to have occurred if

1. the detection limit of 0.5 milligrams of the sum of aromatic mineral oil hydrocarbons per kilogram of food is not exceeded or
2. the detection limit of 0.15 milligrams of the sum of aromatic mineral oil hydrocarbons per kilogram of food simulant is not exceeded

### Effective date

- apply after a three-year transition period
- provide a two-year sales period for products that are in compliant before the amendment

### Additional Information

Draft regulation (in English):

[https://docs.wto.org/dol2fe/Pages/FE\\_Search/ExportFile.aspx?id=272089&filename=2021/SPS/DEU/21\\_2072\\_00\\_e.pdf&Open=True](https://docs.wto.org/dol2fe/Pages/FE_Search/ExportFile.aspx?id=272089&filename=2021/SPS/DEU/21_2072_00_e.pdf&Open=True)

### How Does this Impact You? Contact Us to Discuss

If you have any comments and/or questions regarding these requirements, please contact your customer service representative or contact us at [info@us.bureauveritas.com](mailto:info@us.bureauveritas.com)

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