

Conclusions and recommendations

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16. Environmental plastic or OBP appears to be a relatively new input material for mechanical recycling and use in final recycled PET FCMs, hence the available information on these materials is limited. Uncertainty remains regarding the definition and therefore sources of the input material referred to as environmental plastic or OBP, i.e. whether it has been exposed to the open environment for prolonged periods of time or is collected from more controlled systems. There was also insufficient evidence as to whether plastic obtained from sources outside of the EU/UK would contain any additional plastic additives or contaminants, which differ from EU/UK kerbside collected plastic.

17. While there is currently no international or standardised guidance on the use of such materials in established recycling processes, work is being undertaken by industry to contribute to the overall body of evidence. However, sufficient evidence is required to inform and ensure compliance with the relevant assimilated UK regulations. To inform compliance it would need to be demonstrated that contamination of environmental plastic or OBP collected for use as input material in established mechanical recycling processes was comparable to that of UK kerbside plastic. At the present time there remains uncertainty as to the overall contamination of environmental or OBP or the appropriate reference standards or contamination levels to use in an assessment. Therefore, it is challenging to carry out an accurate risk assessment. More work is

required to address the data gaps to derive the reference contamination level from this source (e.g. is the 3 mg/kg reference level derived from the FAIR recyclability project for kerbside collections (EC, 2004) also applicable to environmental plastic and OBP) and to allow an appropriate approach to be undertaken. Work will also be needed to assess the standard of proof/evidence that is required.

18. The FCMJEG recognises the benefits of recycling environmental plastic and OBP and the value of any measures that recycles and puts these materials to a sustainable use. However, based on the current evidence, the FCMJEG could not exclude a safety risk from the use of environmental plastic or OBP in food contact materials, either in direct contact with food or behind a functional barrier. Should, in the future, appropriate evidence derived from additional data sets become available to support the safe use of these materials in FCM's then the FCMJEG and FSA/FSS would carry out a safety assessment at that point.

FCMJEG Position Paper

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