

Avery Dennison ADvantage: Complete Compliance

Compliance Quick Facts Sheet

U.S. Food Contact Products

Avery Dennison products that are used for food packaging and labeling may be subject to the main food safety law of the U.S., the Federal Food, Drug, and Cosmetics Act (FFDCA). Under this law, the U.S. Food and Drug Administration (FDA) regulates food and food additives, including materials that are intended to be used in contact with food such as food packaging.

The definitions of items regulated by the FDA are broad enough to encompass some Avery Dennison products and materials. A food contact substance (FCS) is defined as any substance that is intended for use as a component of materials used in manufacturing, packing, packaging, transporting, or holding food, if use of the substance is not intended to have any technical effect in the food. An FCS may be considered an indirect additive, which needs to be approved by the FDA. The approval may occur through listing or meeting the requirements in 21 Code of Federal Regulations Parts 173-186. These regulations contain separate sections for adhesive and coatings; paper and paperboard; polymers; and adjuvants, production aids, and sanitizers. In some cases, for additives not already approved or that do not meet the requirements of these regulations, it may be necessary to submit a food contact notification to FDA before manufacturing or using an FCS.

A food packaging substance may be used without prior FDA review when there is a sound basis for concluding that it is not a food additive because it is not reasonably expected to become a component of food under the conditions of its intended use. This is a determination that a company can make when there is evidence based on extraction studies and/or calculations that the substances will not migrate into the food. There are a number of other exemptions that are outlined in the regulations and the FDA guidance. Determining if a material or a products meets these exemptions and are safe for use in food is done by experts who specialize in the testing, calculations, and records to support the determination.

Avery Dennison ADvantage: Complete Compliance is a global service initiative that helps customers navigate the complexities of regulatory, trade and customer compliance issues. Complete Compliance delivers training, tools and advice that guides customers through regulatory data and certifications to ensure products meet the compliance demands of specific applications.

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Classification: Avery Dennison - Public

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U.S. Food Contact Products Product Compliance

Avery Dennison's product compliance team includes experts on the requirements that apply to the products we sell for food packaging and labeling applications who also help our product development team ensure that the materials we use in products intended for food contact comply with the requirements of the U.S. FDA.

Avery Dennison conducts the necessary analyses of our food contact products (e.g., labels, adhesives, and others), and obtains clearances and approvals when required. We also partner with third party food contact experts and laboratories to assist with these assessments and approvals as needed. Our product compliance team is available to support our customers with food contact compliance data, including migration test results and other information on the suitability of our products for use with food. We provide food contact declarations as necessary and applicable.

Information on the U.S. food contact requirements is available at:

<http://www.fda.gov/food/ingredientspackaginglabeling/packagingfcs/default.htm>

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