

PET Product Stewardship Considerations

The U.S. Food and Drug Administration and the European Food Safety Authority maintain rigorous regulatory procedures that the PET recycling industry employs to ensure that recycled PET is used safely in food and beverage packaging applications.

The Guidance below is provided with these two objectives in mind:

1. Minimize the risk that any undesirable chemicals or substances will be present in the wastewater generated by the PET recycling process, even at exceptionally low levels of detection.
2. To remind those in the PET packaging value chain that certain substances have an especially negative public perception. And while these substances are managed in US FDA and EFSA regulations impacting recycled PET, their use is highly undesirable in PET packaging applications.

The terms used in the guidance below are well known to those that manage regulatory aspects of plastics for food packaging applications. If the terms are not familiar to you, APR recommends that you discuss these requirements with your various suppliers who have the required background. The following Stewardship guidance is provided for all PET container, thermoform and component design features in the final state in consumer packaging:

- All components used for food packaging should conform to the regulatory requirements in the locality of use.
- Toxic chemical substances and chemical hazards should be avoided in raw material components used in base resins, printing and label products, and other design features and package components. These include the following:
 - Carcinogenic, Mutagenic or Reprotoxic (CMR) substances; one reference listing is: [Agents Classified by the IARC Monographs, Volumes 1–128 – IARC Monographs on the Identification of Carcinogenic Hazards to Humans \(who.int\)](#);
 - Persistent Organic Pollutants; reference [ECHA POP list](#)

- All PET container and component materials should conform to the following documented regulations and published exclusion lists with threshold levels to guide proper interpretation of risks:
 - CONEG regulations for metals;
 - California Proposition 65-listed materials having Safe Harbor levels;
 - Substances of Very High Concern listings from ECHA; reference [candidate list for authorization](#)

This APR Guidance is offered today to promote industry awareness of these product stewardship topics. A longer-term goal at APR may be to include adherence to this guidance when evaluating package features that meet the APR Preferred category.