

FOOD STANDARDS AGENCY CONSULTATION

Title: THE MATERIALS AND ARTICLES IN CONTACT WITH FOOD (ENGLAND) (AMENDMENT) REGULATIONS 2009

CONSULTATION SUMMARY PAGE

Date consultation launched:	Closing date for responses:
20 th August 2009	21 st September 2009

Who will this consultation be of most interest to?

The proposed Regulations are relevant to port and trading standards officers involved in the enforcement of the law governing these materials and articles. Businesses will need to be aware of the proposals.

What is the subject of this consultation?

The Materials and Articles in Contact with Food (England) (Amendment) Regulations 2009, amending the Materials and Articles in Contact with Food (England) Regulations 2007. To provide notice of the intention to make proposals for statutory provisions for the enforcement of certain requirements, particularly labelling and declaration requirements, in Commission Regulation 450/2009 on active and intelligent materials and articles intended to come into contact with foods (“the AIM Regulation”).

What is the purpose of this consultation?

To seek comments from enforcement authorities on the proposed Regulations, to make businesses aware of the requirements and to provide opportunity for interested parties to comment on the proposals.

Responses to this consultation should be sent to:

Name: Nasreen Shah

Division/Branch: Food Safety:
Contaminants

FOOD STANDARDS AGENCY

Tel: +44 207 276 8553

Fax: + 44 207 276 8446

Postal address: Room 4C, Aviation House,
125 Kingsway

London

WC2B 6NH

Email: Nasreen.a.shah@foodstandards.gsi.gov.uk

Is an Impact Assessment included
with this consultation?

Yes

No See Annex A for reason.



DETAIL OF CONSULTATION

We would welcome your comments on the proposed Materials and Articles in Contact with Food (England) (Amendment) Regulations 2009, enclosed as Annex B. The proposed Regulations provide for the enforcement of a number of provisions contained in Commission Regulation (EC) No. 450/2009, the "AIM" Regulation. These provisions relate to particular labelling and declaration requirements for goods placed on the market. They specifically concern the labelling of parts of the packaging that could be wrongly taken by some consumers to be edible, the written declaration of legal compliance to accompany active and intelligent materials and articles prior to retail sale, and the production, to enforcement authorities on request, of supporting documentation to substantiate the declaration of compliance. These provisions need to be in place by 19th December 2009 to ensure that enforcement authorities have the necessary powers to act under the AIM Regulation at the time they come into force, thus avoiding a gap of several months before the enforcement provisions for the remainder of the AIM Regulation are introduced, probably in July 2010.

We are therefore conducting this short four week consultation to seek comments from interested parties while also ensuring that these provisions are in place by the deadline set out in the AIM Regulation. We welcome your comments on the way in which the proposed Materials and Articles in Contact with Food (England) (Amendment) Regulations 2009 provide for enforcement of the AIM Regulation. See Proposals paragraph 1, below.

The AIM Regulation was published in the Official Journal (OJ) of the EU on 30th May 2009 (Ref OJ, 30.05.2009, L135 pg 3-11), came into force on 18th June 2009 and is directly applicable throughout the EU. Copies of the new Regulation can be freely accessed and downloaded from the following website: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:135:0003:0011:EN:PDF>

The Food Standards Agency in Scotland, Wales and Northern Ireland will each consult on parallel but separate Regulations that will apply in their territories.

Introduction

The general principles on all food contact materials and articles intended to come into contact with foodstuffs are established in Regulation (EC) No. 1935/2004. This lays down the framework of regulation for all materials and articles intended to come into contact with food, including those classed as 'active' and 'intelligent'. The enforcement provisions of that Regulation are implemented in England by The Materials and Articles in Contact with Food (England) Regulations 2007¹. The proposed Materials and Articles in Contact with Food (England) (Amendment) Regulations 2009 will amend the 2007 Regulations to take into account a number of provisions in the AIM Regulation that have to be in place by 19th December 2009. The remaining enforcement provisions will be subject to a full 12 week consultation later in the year.

¹ Statutory Instrument No. 2790/2007

Proposals

1. The proposed Materials and Articles in Contact with Food (England) (Amendment) Regulations 2009 will provide for the effective enforcement of a number of provisions contained in the AIM Regulation by the enforcement authorities in England, as set out in paragraph 3 below.

2. The Agency believes that the adoption of these proposals provides for the continuation of consumer protection through the enforcement of rules that protect consumers against accidentally eating non-consumable parts of packaging and against food contamination by chemicals whose ingestion would carry serious long term and unacceptable risk to consumer health, in particular among vulnerable people. The introduction of harmonised statutory controls would reduce the potential for uncertainty or dispute in relation to the requirements of the AIM Regulation. The key proposals and options are discussed below:

Key proposal(s):

- **To provide for the enforcement of a number of provisions contained in the AIM Regulation that have to be in place by 19th December 2009, by designating local authorities and port health authorities to have responsibility for the enforcement of these provisions in England;**
- **To provide for offences under the Regulation and for defences against conviction for committing an offence in particular circumstances; and**
- **To specify the penalties that the Courts may impose upon conviction for an offence.**

Option 1 – Do Nothing

- **This runs counter to the UK Government’s commitment to meet its EU obligations and to fulfil its policy on consumer protection in this area. It would also create the potential for infraction proceedings to be taken by the European Commission if the labelling and documentation provisions of the AIM Regulation are not enforceable in the UK by the deadline of 19th December 2009.**

Option 2 – Implement enforcement provisions for the AIM Regulation in relation to labelling and documentation.

- **This option fully meets the UK Government’s commitment to fulfil its EU obligations and contribute significantly to the up-to-date means of protecting consumers from ingesting harmful levels of chemicals that could have migrated from materials and articles intended to come into contact with food and not controlled or labelled appropriately.**

3. Details of the proposed Regulations, which would amend The Materials and Articles in Contact with Food (England) Regulations 2007 (“the 2007 Regulations”) to provide for the enforcement of certain provisions of the AIM Regulation, are as follows:

In regulation 2 (interpretation) of the 2007 Regulations:

- regulation 3(a)(i) inserts a full definition of the AIM Regulation so it can then be referred to in shortened form later in the SI;
- regulation 3(a)(ii) amends the definition of “import” by replacing “Member State with “an EEA State”. This amendment takes into account that products from Iceland, Norway and Liechtenstein should not be treated as third country imports. This corrects an existing anomaly and creates consistency between the 2007 Regulations and the Plastic Materials and Articles in Contact with Food (England) Regulations 2009;
- regulation 3(b) deletes paragraph (2) and is a technical drafting amendment.

After regulation 4 of the 2007 Regulations:

- a new regulation 4A is inserted to provide for the enforcement of those provisions in the AIM Regulation that apply from 19th December 2009 by making it an offence if the requirements are not complied with. Note that at regulation 4A(b) reference is made to the transitional phase out period provided for in Article 14 of the AIM Regulation.

After regulation 6 of the 2007 Regulations:

- a new regulation 6A is inserted which designates the Agency and enforcement authorities as competent authorities for the purposes of one particular requirement of the AIM Regulation. This identifies the bodies which may demand documentary evidence that materials and articles and their components are compliant with the legislation. Failure to comply with this request from either the Agency or the relevant local authority may result in prosecution;

In regulation 13 (offences and penalties) of the 2007 Regulations:

- regulation 6 makes an amendment that sets out the applicable penalties if an offence is committed under regulation 4A referred to above.

For regulation 14 (enforcement) of the 2007 Regulations:

- regulation 7 substitutes an amended regulation 14 which adds the relevant provisions of the AIM Regulation to the EU measures that food authorities and port health authorities have a duty to enforce and provides that the Agency may choose to enforce the AIM Regulation in relation to documentation and compliance declarations, a power which it already has in relation to production of documents under Regulation 1935/2004.

In regulation 18(2) (general defences) of the 2007 Regulations:

- regulation 8 provides for the due diligence defence to apply in relation to the named Articles of the AIM Regulation, by including new regulation 4A among the regulations to which the defence is applicable.

In regulation 21 of the 2007 Regulations:

- regulation 9 provides for the application of specified provisions of the Food Safety Act 1990 to enforcement activities connected with the AIM Regulation.

Consultation Process

4. During the course of negotiations with the European Commission, officials of the Food Standards Agency (“the Agency”) have frequently conveyed information to interested organisations including industry, research institutes, consumer groups, enforcement authorities and any other parties with an interest in policy issues related to food contact materials. Earlier stages in the development of these proposals have been subject to two previous consultations, one in 2006 and again in 2008, when these proposals were last amended. These previous consultations did not raise any adverse comments from stakeholders.

5. The informal consultations carried out in 2006 and 2008 did not raise any pertinent issues about the cost implications in relation to the AIM Regulation from enforcement authorities or businesses. There were however, several comments on points of detail from the 2008 consultation that were noted and, where they did not affect overall UK negotiating lines, were raised in discussions with the Commission and other EU Member States and, in some cases small changes to the text of the AIM Regulation resulted.

6. This consultation is not being held for a full 12 weeks because substantive provisions of the AIM Regulation have already been subject to two earlier consultations and businesses will be aware of their obligation to comply with these provisions, which have not changed since the consultation in 2008. The specific provisions that are subject of this consultation relate specifically to the labelling and documentation requirements that have to be in place by 19th December 2009. If these provisions are not in place by this date, then parts of the European Regulation cannot be enforced and the United Kingdom could be open to infraction proceedings by the European Commission. This provides restricted flexibility in the consultation period that we can allow, but we will try to accommodate those needing more time where it is essential.

Comments

7. We would now welcome comments on the proposed Regulations (which are attached as Annex B) in so far as they relate to the provisions for enforcement, offences, defences and penalties. We would also now welcome comments on any costs likely to be incurred in implementing the enforcement proposals. Although costs arising from the need to comply with the AIM Regulation are not strictly part of this consultation, it always helps us to provide a full picture of any burdens (particularly administrative burdens) placed upon those affected by the proposals. Where the costs for compliance relate to the AIM Regulation itself, they should be shown under separate headings from those attributable to the enforcement issues dealt with in the Regulations for England, which are the subject of this consultation. If these costs are indivisible or unquantifiable, this should be made clear.

8. We believe that there are no new or additional costs to business but that there will be some familiarisation costs for enforcement authorities associated with the proposal to implement the enforcement provisions of the AIM Regulation in England.

The need for compliance declarations, documentation and labelling are not new burdens on business, as these are existing requirements under Regulation (EC) No. 1935/2004, Articles 4(5) and 4(6) (labelling of active and intelligent materials and articles), 15(e) and 16. If you disagree with our assumptions, please provide evidence as appropriate on financial costs associated with the proposed English Regulations and/or the AIM Regulation to support your view(s).

9. The Food Standards Agency also has an enforcement role with regard to the EC Regulation 1935/2004 in respect of declarations of compliance, as indicated in Article 16 of that Regulation. Chapter IV, Article 12 and Article 13 of the AIM Regulation require that appropriate documentation be made available to competent authorities on demand to show that their products comply with the legislation, which are being reinforced by the provisions being implemented here.

10. We would welcome any comments on our view that there are no new administrative costs associated with these proposals. We would also welcome your comments and evidence to support your view, if you believe that the proposed Regulations do introduce any new administrative costs, over and above what a business would do in the normal course of commercial activity.

11. Any other comments you are able to provide in relation to the proposed Regulations would be helpful. We would be particularly keen to hear from small businesses on any likely impact of the Regulations and would encourage them to comment on all aspects of the proposal and its intended effect.

Questions asked in this consultation:

Q1. Is our assumption reasonable that the only new or additional costs associated with the proposed Regulations are familiarisation costs for enforcement authorities? If you disagree with this assessment, please provide evidence to support your views.

Q2. Is our assumption reasonable that there are no new or additional administrative burdens for business associated with the enforcement of the new EU rules on labelling in the proposed Regulations? Are there others that we have not mentioned? Please provide evidence to support your views.

Q3. Do you agree with the proposal at Regulation 6A that designates the Food Standards Agency as the competent authority together with the food authorities in relation to the request for supporting documentation? The consequence of this proposal is that failure to comply with the request from either the Agency or the relevant authority may result in prosecution. If you disagree with the proposal please provide evidence to explain and support your views.

Other relevant documents

12. Copies of the AIM Regulation can be freely accessed and downloaded at the following website address:

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:135:0003:0011:EN:PDF>

13. The Materials and Articles in Contact with Food (England) Regulations 2007 are available from Stationery Office book shops or the Stationery Office PO Box 29, Norwich, NR3 1GN ☎: 0870 600 5522, fax: 0870 600 5533. Statutory Instruments issued since 1997 are also published, free-of-charge, on the website of the Office of Public Sector Information (previously Her Majesty's Stationery Office (HMSO)), address <http://www.opsi.gov.uk>. Copies can also be purchased from this website address.

Responses

14. **Responses are required by close 21st September 2009**. Please state, in your response, whether you are responding as a private individual or on behalf of an organisation/company (including details of any stakeholders your organisation represents).

Thank you on behalf of the Food Standards Agency for participating in this public consultation.

**Nasreen Shah,
Policy Manager
Strategy and Policy Unit
Food Safety: Contaminants Division
Food Contact Materials Team (Policy and Legislation), Branch 1**

Enclosed

Annex A: Standard Consultation Information (which also provides an explanation on why an Impact Assessment is not included as part of the consultation)

Annex B: The Draft Materials and Articles in Contact with Food (England) (Amendment) Regulations 2009

Annex C: List of interested parties

Queries

1. If you have any queries relating to this consultation please contact the person named on page 1, who will be able to respond to your questions.

Publication of personal data and confidentiality of responses

2. In accordance with the FSA principle of openness our Information Centre at Aviation House will hold a copy of the completed consultation. Responses will be open to public access upon request. The FSA will also publish a summary of responses, which may include personal data, such as your full name and contact address details. If you do not want this information to be released, please complete and return the Publication of Personal Data form, which is on the website at <http://www.food.gov.uk/multimedia/pdfs/dataprotection.pdf> Return of this form does not mean that we will treat your response to the consultation as confidential, just your personal data.
3. In accordance with the provisions of Freedom of Information Act 2000 and/or the Environmental Information Regulations 2004, all information contained in your response may be subject to publication or disclosure. If you consider that some of the information provided in your response should not be disclosed, you should indicate the information concerned, request that it is not disclosed and explain what harm you consider would result from disclosure. The decision on whether the information should be withheld rests with the FSA. However, we will take into account your views when making this decision.
4. Any automatic confidentiality disclaimer generated by your IT system will not be considered as such a request unless you specifically include a request, with an explanation, in the main text of your response.

Further information

5. A list of interested parties to whom this letter is being sent appears in Annex C. Please feel free to pass this document to any other interested parties, or send us their full contact details and we will arrange for a copy to be sent to them direct.
6. Please let us know if you need paper copies of the consultation documents or of anything specified under '**Other relevant documents**'.
7. This consultation has been prepared in accordance with HM Government Code of Practice on Consultation, available at: <http://www.berr.gov.uk/files/file47158.pdf> The Consultation Criteria are available at <http://www.berr.gov.uk/whatwedo/bre/consultation-guidance/page44458.html>
8. Criterion 2 of HM Government Code of Practice on Consultation states *Consultations should normally last for at least 12 weeks with consideration given to longer timescales where feasible and sensible. This consultation is not being held for 12 weeks.* Please see explanation at paragraph 6 of the consultation letter.
9. The Code of Practice states that an Impact Assessment should normally be published alongside a formal consultation. We have not produced an Impact Assessment for this Statutory Instrument on the basis that there will be no impact on business because they will already be labelling their products, as required by the provisions set out in Regulation (EC) No. 1935/2004 (Article 15) on food contact

materials, and that there will be very little impact on enforcers, other than those mentioned in paragraph 7 of the consultation letter (public sector costs are below the threshold for an Impact Assessment).

10. For details about the consultation process (not about the content of this consultation) please contact: Food Standards Agency Consultation Co-ordinator, Room 2C, Aviation House, 125 Kingsway, London, WC2B 6NH. Tel: 0207 276 8630.

Comments on the consultation process itself

11. We are interested in what you thought of this consultation and would therefore welcome your general feedback on both the consultation package and overall consultation process. If you would like to help us improve the quality of future consultations, please feel free to share your thoughts with us by using the Consultation Feedback Questionnaire at <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc>
12. If you would like to be included on future Food Standards Agency consultations on other topics, please advise us of those subject areas that you might be specifically interested in by using the Consultation Feedback Questionnaire at <http://www.food.gov.uk/multimedia/worddocs/consultfeedback.doc>. The questionnaire can also be used to update us about your existing contact details.

 S T A T U T O R Y I N S T R U M E N T S

2008 No.

FOOD, ENGLAND

**The Materials and Articles in Contact with Food (England)
(Amendment) Regulations 2009**

Made - - - - - ***

Laid before Parliament ***

Coming into force - - - - - *19th December 2009*

The Secretary of State makes the following Regulations in exercise of the powers conferred by sections 16(2), 17(1) and (2), 26(1)(a) and (2)(a) and 48(1) of the Food Safety Act 1990(a), and now vested in him(b).

In accordance with section 48(4A) of the Food Safety Act 1990 he has had regard to relevant advice given by the Food Standards Agency.

As required by Article 9 of Regulation (EC) No. 178/2002 of the European Parliament and of the Council laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety(c), there has been open and transparent public consultation during the preparation and evaluation of these Regulations.

Title and commencement

1. These Regulations may be cited as the Materials and Articles in Contact with Food (England) (Amendment) Regulations 2009 and come into force on 19th December 2009.

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- (a) 1990 c.16, section 1(1) and (2) (definition of “food”) was substituted by S.I. 2004/2990. Sections 17 and 48 were amended by paragraphs 12 and 21 respectively of Schedule 5 to the Food Standards Act 1999 (1999 c.28), “the 1999Act”. Section 48 was also amended by S.I. 2004/2990. Section 53(2) was amended by paragraph 19 of Schedule 16 to the Deregulation and Contracting Out Act 1994 (1994 c.40), Schedule 6 to the 1999 Act and S.I. 2004/2990.
- (b) Functions formerly exercisable by “the Ministers”,(being, in relation to England and Wales and acting jointly, the Minister of Agriculture, Fisheries and Food and the Secretaries of State respectively concerned with health in England and food and health in Wales and, in relation to Scotland, the Secretary of State) are now exercisable in relation to England by the Secretary of State pursuant to paragraph 8 of Schedule 5 to the 1999 Act. Functions of “the Ministers” so far as exercisable in relation to Wales were transferred to the National Assembly for Wales by the National Assembly for Wales (Transfer of Functions) Order 1999 (S.I. 1999/672) as read with section 40(3) of the 1999 Act, and thereafter transferred to the Welsh Ministers by paragraph 30 of Schedule 11 to the Government of Wales Act 2006 (2006 c.32). Those functions so far as exercisable in relation to Scotland were transferred to the Scottish Ministers by section 53 of the Scotland Act 1998 (1998 c. 46) as read with section 40(2) of the 1999 Act.
- (c) OJ No. L31, 1.2.2002, p.1.). That Regulation was last amended by Commission Regulation (EC) No. 202/2008 (OJ No. L60, 5.3.2008, p.17).

Amendments to the Materials and Articles in Contact with Food (England) Regulations 2007

2. The Materials and Articles in Contact with Food (England) Regulations 2007(a) are amended in accordance with regulations 3 to 9.

3. In regulation 2 (interpretation) —

(a) in paragraph (1) —

(i) after the definition of “Regulation 2023/2006” insert the following definition —

““Regulation 450/2009” means Commission Regulation (EC) No. 450/2009 on active and intelligent materials and articles intended to come into contact with food(b);”, and

(ii) in the definition of “import” for “a Member State” substitute “an EEA State”; and

(b) paragraph (2) is omitted.

4. After regulation 4 (enforcement of Regulation 1935/2004) insert the following as regulation 4A —

“Enforcement of Regulation 450/2009

4A. Any person who contravenes any of the following provisions of Regulation 450/2009 is guilty of an offence —

(a) Article 4(f) (prohibition on the placing on the market of active and intelligent materials and articles that do not comply with labelling requirements);

(b) Article 11(1) and (2) (additional rules on labelling), as read with the 4th indent of Article 14;

(c) Article 12 (declaration of compliance); and

(d) Article 13 (supporting documentation).”.

5. After regulation 6 (competent authorities for the purposes of Regulation 1934/2004), insert the following as regulation 6A —

“Competent authorities for the purposes of Regulation 450/2009

6A. The competent authorities for the purposes of Article 13 of Regulation 450/2009 are the Food Standards Agency and the authority having responsibility for enforcement pursuant to regulation 14(1).”.

6. In paragraph (2)(a) of regulation 13 (offences and penalties), for “regulation 4 or 5” substitute “regulation 4, 4A or 5”.

7. For regulation 14 (enforcement) substitute the following —

“**14.**—(1) Each food authority in its area and each port health authority in its district shall execute and enforce —

(a) the provisions of Regulation 1935/2004 mentioned in regulation 4;

(b) the provisions of Regulation 450/2009 mentioned in regulation 4A; and

(c) subject to paragraph (3), these Regulations.

(2) The Food standards Agency may execute and enforce the provisions of —

(a) Articles 16(1) and 17(2) of Regulation 1935/2004; and

(b) Article 13 of Regulation 450/2009.

(3) Each food authority in its area shall execute and enforce the provisions of Regulation 2023/2006 mentioned in regulation 5.”.

(a) S.I. 2007/2790, as amended by S.I. 2008/916 and S.I. 2009/205.

(b) OJ No. L135, 30.5.2009, p.3.

8. In paragraph (2) of regulation 18 (general defences), for “regulation 4 or 13(1)(a)” substitute “regulation 4, 4A or 13(1)(a)”.

9. In regulation 21 (application of various provisions of the Act) —

- (a) in paragraph (2), for “Regulation 1935/2004 or as appropriate to Regulation 2023/2006.” substitute “Regulation 1935/2004, Regulation 2023/2006 or Regulation 450/2009 as appropriate.”; and
- (b) in paragraph (3), for “Regulation 1935/2004 or, as appropriate Regulation 2023/2006,” substitute “Regulation 1935/2004, Regulation 2023/2006 or Regulation 450/2009 as appropriate”.

Signed by authority of the Secretary of State for Health

Date

Minister's name
Minister of State,
Department of Health

EXPLANATORY NOTE

(This note is not part of the Regulations)

1. These Regulations *(to be completed after consultation period)*

Interested Parties

Company
AJH Consulting
AJN Solutions
APD Scientific Limited
AMDEA
Alba Plastics
Alcan Packaging
Association of Consumer Research
Association of Port Health Authorities
Avent Limited
Bilcare Limited
Bird and Bird
Bodycote Testing Group
Boots UK Limited
Boots PDQ Centre
British Adhesives and Sealants Association
British Ceramic Confederation
British Coatings Federation
British Disposable Products Association
British Hardware and Housewares Manufacturers Association Ltd
British Plastics Federation
British Plastics Federation
British Retail Consortium
British Soft Drinks Association
BPIF
CATRA
Cadbury Schweppes
Campden & Chorleywood Food Research Association
Campden & Chorleywood Food Research Association
Catering Equipment Suppliers Association
Centre for Analytical Research in the Environment
Chemical Industries Association
Chilled Food Association
Colormatrix Europe
Confederation of Paper Industries
Crown Corporate Technologies
Dairy Industry Federation
Danapak Flexibles Limited
Department for the Environment, Food and Rural Affairs Business, Innovation and Skills
Dexter Packaging Products
Double D Food Engineering Ltd
Eclipse Scientific Group
Enterprise Directorate
Federation of Small Businesses
The Food and Environment Research Association
FOODAWARE
Food And Drink Federation
Food Policy Update
H J Heinz
Halton Borough Council
Home Retail Group

ICI Paints
ICI Packaging Coatings Limited
Industry Council for Packaging and the Environment
Innovia Films
JWP Ltd
JEFPAC Limited
Kenwood Limited
Kirkstone Plastics Limited
Laboratory of the Government Chemist
Laboratory of the Government Chemist
LACORS
LINPAC Packaging Limited
London Port Health Authority
Lovell White Durrant
Marks & Spencer Plc
Meridian Speciality Packaging
Metal Packaging Manufacturers Association
Metal Packaging Manufacturers Association
National Consumer Council
National Consumers' Federation
Nippon Gohsei
Office of Fair Trading
Packaging and Films Association
Packaging and Films Association
Packaging and Films Association
Packaging and Films Association
Pillsbury Europe
Pulse Speciality Products
PIRA International
Provision Trade Federation
Plastics Europe
RAPRA Technology Limited
RDA Packaging Consultants
Rexam Plastic Packaging
SafePharm Laboratories Limited
Sainsburys Supermarkets Limited
Sinclair International Limited
Society of Chemical Industry
Spikommat Limited
Sustain
SCA Packaging
Technical Indexes
The Co-operative Retail Group (CWS) Ltd
The Industrial Packaging Association
Toxicology Advice & Consulting Limited
Trading Standards Institute
United Biscuits (UK) Limited
UNIVAR Limited
Weetabix Limited
WHICH
Wilsanco Plastics Limited