

Submission for Proposal P1034 Chemical Migration from Packaging into Food

Question:

Q1 Do you consider that an ongoing monitoring and surveillance strategy, possibly by jurisdictions responsible for enforcement and compliance of food laws⁸ would be a practical measure to identify and manage unknown risks associated with CMPF?

Clorox is supportive of an ongoing monitoring and surveillance strategy, by enforcement and compliance of food laws to identify and manage unknown risks associated with CMPF.

Clorox believes that the data obtained from the monitoring and surveillance should be carried out for a couple of years to establish a robust baseline data for CMPF (like phthalates). Decision for a prescriptive approach option should only be made after the CMPF baseline data on phthalates indicated that the dietary exposure limit is attributed solely from plastic food contact material and that it presented a health risk to the consumer.

Clorox believes that establishing a robust baseline data for CMPF (e.g phthalates) attributed to plastic food contact material is important as our experiences had shown that test data can easily be skewed easily by other contaminants in the environment as well as other factors.

Question:

Q4 What problems can you identify with the status quo option and therefore abandoning this proposal?

For multi-national companies like Clorox, the status quo option works well. We prefer that the status quo option remains.

Questions:

Q6 What do you see as the costs/benefits of this option for consumers, industry and government? Do you consider it would ensure industry has adequate knowledge of the risks from CMPF and implemented available risk mitigation measures?

The prescriptive approach will result in an increase cost for the consumer, industry and government. Multi-national companies like Clorox, has adequate knowledge of the risks from CMPF and have adopted the US approach and the Australian Standard (AS 2070-1999). Thus a prescriptive approach is not required.