

## **Guidance to Consultants on Hot Food Product Development - Product Packaging**

### **UK/EU Legislation**

EU/UK Regulations such as (EC - No. 1935/2004) are designed to protect consumers from food products that are packaged with inappropriate food contact materials (printing ink migration, polymer degradation at temp, etc.) and are supplemented by specific laws (Regulation 450/2009) governing the use of particular materials (food contact plastics, food contact materials etc.).

### **Food Retail Companies and Consultants**

Food Retail companies, keen to enlarge their Hot Food to Go offering, are engaging companies and consultants to assist them with their development of Hot Food to Go Products. When contracted, these companies are often asked to provide guidance in relation to product development, operational practice and Health and Safety. In undertaking these tasks, these companies can also be asked to verify for the Retailers that the products so designed are safe and meet current standards. The product validation process can present a number of issues which are complicated by the fact that current regulations on packaging refer to both packaging materials manufacturers and packaging suppliers.

### **Packaging Suppliers**

Packaging Suppliers provide food product packaging which is designated as suitable for use under a variety of conditions, such as that of temperature exposure. For example, the packaging product specification sheets will refer to the exposed temperature conditions directly by referring to an optimum threshold, ex 75C. In addition, the packaging product is generally provided to the retailers with recommendations for use. These recommendations are often provided in addition to the product specification sheet.

### **Packaging and Packaging Materials Manufacturers**

Packaging manufacturers, supplying materials for use to packaging suppliers, are required to provide packaging materials specification sheets which outline in detail the conditions of application for the packaging materials, i.e., for example the thermal stability of the materials.

### **Concerns for Consultants**

- 1.) The design and development of hot food product to be held in Hot Food Display Units is still fairly new.
- 2.) There appears to be widespread use of packaging products (Solo Cup, Seda Cup) originally designed to hold hot food product but not designed to hold hot food product in hot holding cabinets. There is evidence that this 'adapted' use may be incorrect and pose health risks.
- 3.) Retail Food Companies, lacking operational expertise in this new area, are deploying solutions that make further use of 'adapted' packaging products, i.e., products that were not originally intended to hold hot food product in heated environments.
- 4.) Retail Food Companies may lack or not have access to the supporting documentation (product and material specification sheets) for supporting their current use of packaging.

### **Recommendations**

- 1.) Companies and Consultants engaged in the design and development of Hot Food Product for Hot Food Display Units should ensure that they have access to all packaging product and material specification sheets and confirm that these are up to date.
- 2.) Due to the relative newness of Hot Food to Go products and the lack of either an Equipment or Operational Standard for Hot Food Display Equipment, validation of full production processes should include a review of preparation, cooking and holding stages to ensure that overall production processes lead to the creation of a safe product for consumers.
- 3.) The final arbiters of the safety of the food product should remain the Food Retailers themselves. This will require that they are fully informed of all processes and materials relating to the final and signed-off product and have confirmed and fully validated the safety of the product.