

Communication 022/2026

10 April 2026

Public Consultation on the Draft Revision of BfR Recommendations on paper and board for food contact

The BfR Recommendations XXXVI, XXXVI/1, XXXVI/2, and XXXVI/3 on paper and board for food contact are to be revised and updated step by step in the coming years, as is currently being done for BfR Recommendations XXI, XXI/1, and XXI/2 on commodities based on natural and synthetic rubber. As a first step, the four paper recommendations have been converted from text to tabular form and combined. In addition, the CAS numbers of the listed substances have been included where available. Apart from minor editorial adjustments, no substantive revision of the recommendations is planned at this stage.

The German Federal Institute for Risk Assessment (BfR) asks companies that manufacture or market products in accordance with BfR Recommendations XXXVI, XXXVI/1, XXXVI/2, and XXXVI/3 to review the draft of the consolidated and tabular revision of these BfR Recommendations.

Please note: There is currently no English version of the draft.

Particular attention should be paid to the following points:

1. General review: If you have used or are using previously listed substances in accordance with the aforementioned BfR recommendations, please check the entries in the new draft tabular revision to see whether, in your opinion, they correspond to the listings in the previously applicable BfR recommendations XXXVI, XXXVI/1, XXXVI/2 and XXXVI/3 – including possible restrictions – and whether the substances can therefore continue to be used in accordance with the updated BfR recommendation XXXVI (including the application areas XXXVI/1, XXXVI/2 and XXXVI/3).

2. CAS numbers: For a number of substance entries, CAS numbers – insofar as they were known to the BfR – have been included in the draft. In some cases, several CAS numbers may be applicable to a single entry – for example, in broader entries such as "Iron oxides and iron hydroxides (E 172)." If you have used or are using previously listed substances in accordance with the aforementioned BfR recommendations, please check whether the CAS

numbers of the substances you use are listed in the draft tabular version. If the CAS number of the substance you use is missing from the draft revision, please send an email to the BfR with the substance entry and the corresponding CAS number that you believe to be correct. The BfR will check the submitted CAS numbers and add them to the respective substance entries if they match the chemical names.

Please note: For entries where CAS numbers are listed, only the listed CAS numbers are compliant with the updated BfR Recommendation XXXVI (including application areas XXXVI/1, XXXVI/2, and XXXVI/3) following its publication.

Please also note: For entries where no CAS number(s) are listed (---), no CAS numbers need to be checked or submitted at this time, as in this state of revision, still only the respective substance name remains decisive for compliance with the respective entry.

Please submit any remarks and comments directly in the document or in a separate letter by 30 June, 2026, to fcm@bfr.bund.de.

Further information on Food Contact Materials

XXXVI. Papiere, Kartons und Pappen für den Lebensmittelkontakt (in German only)

<https://empfehlungen.bfr.bund.de/recommendations/360/pdf>

BfR Recommendations on Food Contact Materials

<https://www.bfr.bund.de/en/service/databases/bfr-recommendations-on-food-contact-materials/>

About the BfR

The German Federal Institute for Risk Assessment (BfR) is a scientifically independent institution within the portfolio of the German Federal Ministry of Agriculture, Food and Regional Identity (BMLEH). It protects people's health preventively in the fields of public health and veterinary public health. The BfR provides advice to the Federal Government as well as the Federal States ('Laender') on questions related to food, feed, chemical and product safety. The BfR conducts its own research on topics closely related to its assessment tasks.

This text version is a translation of the original German text which is the only legally binding version.

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Publisher:

German Federal Institute for Risk Assessment

Max-Dohrn-Straße 8-10

10589 Berlin, Germany

T +49 30 18412-0

F +49 30 18412-99099

bfr@bfr.bund.de

bfr.bund.de/en

Institution under public law

Represented by the President Professor Dr Dr Dr h. c. Andreas Hensel

Supervisory Authority: Federal Ministry of Agriculture, Food and Regional Identity

VAT ID No. DE 165 893 448

Responsible according to the German Press Law: Dr Suzan Fiack



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