# Electrolux Group Instruction on Food Contact Materials (FCM)

Revision A

**Instructions and guidance for managing materials and components that come into contact with food.**

# Contents

## 1. Track of changes

| Revision | Description | Date |
|---|---|---|
| A | First release | 2025/02/28 |

## 2. Introduction

Within the Electrolux Group Sustainability framework "For The Better 2030", the Group strives to create Better Solutions and Better Living by placing on the market safe and healthy products free from harmful chemicals.
The objective of this document is to:

- facilitate compliance towards food contact requirements at global level of products placed on the market by Electrolux Group
- ensure that Electrolux products, including accessories and spare parts, do not transfer their constituents to food in quantities which could:
  - endanger human health.
  - bring about an unacceptable change in the composition of the food.
  - bring about a deterioration in the organoleptic characteristics of the food (taste, smell and color).

The purpose of this document is:

- providing a general overview on food contact.
- Increasing awareness on the global regulatory landscape in relation to FCM requirements.
- Highlighting key aspects of food contact compliance.

It is of the essence, starting from the design phase of a food contact article, to identify the intended application, understand which parts are in contact with food and the type of food that will come into contact with them (e.g. all types of foods, only water), the target markets and the related specific legal requirements.

## 3. Applicability

This document applies to all materials, articles and products which can be used for the preparation, storage and serving of food. Specific attention shall be given to the food contact articles in scope of the different legislations.

Below a list of key definitions commonly used in legislations to define the field of applicability:

- Direct Food contact: all articles that are intentionally designed to be brought into direct contact with food (e.g. baking trays, drawers, pots & pans, coffee tanks).
- Foreseeable contact: all articles for which a contact with food is highly probable during normal use (e.g. splash areas).
- Indirect contact: all articles that are not designed to be in contact with food but for which a contact could occur under certain conditions of use (e.g. substance emitted by a gasket that can impact the food).
- Misuse/incorrect use: all articles that are not designed or foreseen to be in contact with food but that are used wrongly by the user (e.g. the freezer plastic ice scraper used to prepare cakes, or a bottle holder used to store salami).

## 4. Documentation, Labelling & User Manual

Food contact materials, articles and products shall be accompanied by a set of different documents and information along the supply chain.

This may include, depending on the legislation:

- product name, material identification, declaration of conformity/compliance to relevant laws, regulations and standards, test reports, regulatory datasheet (RAPIDS), Safety Data Sheets (SDS)
- name, address and contact information of the producer and (or) dealer, production date, warranty period (if applicable), instruction for use
- other special documents might be requested, as an example, in US customers may ask for a "letter of guaranty" from manufacturers certifying that a particular substance or material is acceptable for the intended food-contact use.

Specific labelling requirements might also be applicable depending on the legislation (e.g. the glass & fork symbol in Europe or spoon & chopsticks in China) above all in the cases in which the final use of the article is not clear.

Any special instruction to be observed for safe and appropriate use of the article or product shall be included in the user manual as well as any specific advice to avoid misuse (e.g. a wine cellar is only meant to store wine bottles).

## 5. Good Manufacturing Practice (GMP)

Food contact materials and articles must be manufactured in accordance with Good Manufacturing Practices (GMP).

GMP shall be applied to all sectors and to all stages of manufacturing, processing and distribution of materials and articles. GMP is based on the effective implementation and monitoring of a Quality System to guarantee that food contact materials and articles are consistently produced and controlled in conformity with the requirements applicable to them.

Examples of GMP legislations are EU 2023/2006, China GB 31603 and US FDA 21 CFR 117.

## 6. High level overview of legal landscape

The table below provides a high-level overview of the food contact regulatory approaches within the different Business Areas, highlighting the main driving countries/governmental organization. This is not intended to be an exhaustive list.

| BA | Highlights |
|---|---|
| Europe | Two overarching Regulations:<br>- The framework EU Regulation EC 1935/2004 sets up general requirements for Material and Articles intended to come into contact with food (FCM)<br>- Regulation EC 2023/2006 outlines the requirements on Good Manufacturing Practice (GMP)<br>- In addition, there are EU daughter harmonized requirements (Directives, Regulations and Guidelines) as well as many National requirements related to specific materials and applications.<br>Requirements are summarized in Electrolux Group SP000003871 - Technical Guideline for Materials and Articles in contact with Food (FCM) for EU markets |
| APMEA | No harmonized requirements through the region/s.<br>Specific measures on different materials and level of requirements highly depending on the country.<br>Some countries require proof of compliance in governmental approved testing institutes (e.g. Korea, China). |
| North America | USA: food contact materials (FCM) are administered by the Food and Drug Administration (FDA). Regulations pertaining to FCM can principally be found in Title 21 of the Code of Federal Regulations (CFR).<br>Canada: Food contact materials (FCM) and articles are regulated by the Canada Consumer Product Safety Act (CCPSA) in Canada |
| Latin America | Food contact regulations depending on country blocks:<br>- MERCOSUR (Brazil, Argentina, Paraguay, Panamá, Uruguay, *Venezuela**)<br>- Non MERCOSUR countries (Chile, Peru, Bolivia, Ecuador, Colombia)<br>*Currently Venezuela is suspended in all the rights and obligations inherent to its status as a State Party of MERCOSUR.<br>Specific FCM requirements in place for Chile, Brazil, Ecuador and Colombia. |

### 6.1. Positive Lists

Specific attention shall be given to requirements that include "positive lists" of materials/substances (as an example Europe, Ukraine, China). A positive list includes materials/monomers/substances that are allowed to be used when producing food contact articles under the provision set in the specific legislation.

Note that materials/monomers/substances not included in the positive list may not be allowed to be used unless an official authorization request is submitted and approved by competent authorities (e.g. European Food Safety Authority – EFSA).

### 6.2. Recycled materials in contact with Food

Recycled materials used in articles intended to come into contact with food must fulfil all applicable legal requirements. In some regions (e.g. Europe, North America), to be able to use these materials for FCM application, there are specific legal requirements, that force the full supply chain to go through specific and detailed authorization processes.

Refer to:

- Electrolux Group Instruction on Recycled Plastics
- SP000003871 - Technical Guideline for Materials and Articles in contact with Food (FCM) for EU market, for detailed requirements on the use of recycled plastics for FCM application in Europe.

## 7. Link to Restricted Material List (RML) substance list

In addition to the specific requirements set in the applicable legislations, special attention shall be given to substances/polymers reported in the RML substance list where specific "FCM" requirements and limits are reported due to intrinsic hazard properties or preventative Electrolux approach (e.g. polycarbonate, PFAS, bisphenols).

## 8. Glossary

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| CCPSA | Canada Consumer Product Safety Act |
| CFR | US Code of Federal Regulations |
| EFSA | European Food Safety Authority |
| FCM | Food Contact Materials |
| FDA | US Food and Drug Administration |
| GB Standards | China national standards also called Guobiao Standards |
| GMP | Good Manufacturing Practice |
| MERCOSUR | Mercado Común del Sur (Spanish), Mercado Comum do Sul (Portuguese)- The LATAM Southern Common Market |
| PFAS | Per- and polyfluoroalkyl substances |
| RAPIDS | Regulatory Affairs Product Stewardship Information / Certification Data Sheet |
| RML | Restricted Materials List |
| SDS | Safety Data Sheet |