



FOODSERVICE PACKAGING
INSTITUTE®

**A Compliance Manual
Related to
Foodservice Packaging in North America**

Updated 2023

Introduction

Foodservice packaging is subject to many different rules and regulations to ensure that the products safely deliver the foods and beverages in them. In addition, customer requests for audits, certifications, etc. related to a number of packaging issues continue to grow.

FPI's Compliance Manual is meant to be a compendium of regulations governing foodservice packaging products, plus other relevant regulations, standards, guidelines, recommendations, and practices, including ones that may be requested by customers.

It is not intended to be – nor could it possibly be – all-inclusive and exhaustive. However, if you have materials that you think should be added to FPI's Compliance Manual, please send the link to fpi@fpi.org for review.

Good Manufacturing Practices – U.S. Resources

FPI has identified regulations in the U.S. that establish standards or guidelines for good manufacturing practices (also known as “GMPs”) in the manufacture of food contact packaging.

The primary regulatory source document for those fabricating food packaging articles in the United States is the U.S. Food and Drug Administration's Code of Federal Regulations (CFR) Section 21, commonly referred to as “CFR 21.” All of the CFR 21 Parts on good manufacturing practices share one thing in common: they are broad, generalized statements about manufacturing actions or procedures that constitute “good” practices, without a lot of specific guidance as to what, exactly, the agency expects from a manufacturer.

- [Code of Federal Regulations Title 21 - Food and Drugs](#). Of particular interest to food purveyors will be:
 - Part 110: Current Good Manufacturing Practice in Manufacturing, Packing, or Holding Human Food
 - Part 117 (forthcoming): Current Good Manufacturing Practices and Hazard Analysis and Risk-Based Preventive Controls (“HARPC”) for Human Food
 - Part 174.5 Indirect Food Additives – General Provisions Applicable to Indirect Food Additives

Of potential importance and interest is the advent and increasing adoption – particularly by foodservice packaging customers – of any number of GMP schemes benchmarked to the [Global Food Safety Initiative \(GFSI\)](#). Those related to the production of food packaging include:

- [BRCGS Global Standard Packaging Materials \(Issue 6\)](#)
- [Food Safety System Certification \(FSSC\) 22000 \(Version 6.0\)](#)
- [IFS PACsecure \(Version 2\)](#)
- [Safe Quality Food \(SQF\) Code \(9th Edition Manufacture of Food Packaging\)](#)

A number of firms offer assistance in determining compliance with GMP regulations and schemes. To name a few, these include:

- [ASI Food Safety Consultants](#)
- [NSF International](#)
- [Packaging Consultants International](#)
- [Merieux NutriSciences](#)
- [Steritech Group](#)

Food Packaging and Materials – U.S. Resources

FPI has also identified regulations in the U.S. that establish standards or guidelines related to the materials used the manufacture of packaging in contact with food. Again, the predominate statute in CFR 21.

- [Code of Federal Regulations Title 21 - Food and Drugs](#). Of particular interest will be:
 - Part 170.100-106: Premarket Notifications
 - Part 174.5 Indirect Food Additives – General Provisions Applicable to Indirect Food Additives
 - Part 174.6: Indirect Food Additives – Threshold of Regulation for Substances Used in Food-Contact Articles
 - Part 175: Indirect Food Additives: Adhesives and Components of Coatings
 - Part 176: Indirect Food Additives: Paper and Paperboard Components
 - Part 176.260: Pulp from Reclaimed Fiber
 - Part 177: Indirect Food Additives: Polymers
 - Part 178: Adjuvants, Production Aids, and Sanitizers
 - Part 179.45: Irradiation of Pre-Packaged Foods
 - Part 181: Prior Sanctioned Food Ingredients
 - Parts 182-186: Substances Generally Recognized As Safe (GRAS)
 - Summary guidance– *please refer to “[Fathoming Food Packaging Regulation Revisited](#),” section F.*

Additional resources from the FDA on food packaging and materials may be found [here](#). Of particular interest in this link will be details on the FDA’s Food Contact Substance Notification program and the use of recycled plastics in food packaging.

Other U.S. Resources

- Consumer Product Packaging and Labeling Regulations and Guidances
 - [ASTM Standard D7611/D7611M-2: Standard practice for Coding Plastic Manufactured Articles for Resin Identification](#)
 - [Code of Federal Regulations Title 21 - Food and Drugs](#) – Part 101: Food Labeling
 - [Fair Packaging and Labeling Act \(FPLA\)](#)
 - [FTC Regulations under the FPLA -- 16 CFR 500](#)

- [FTC Regulations under the FPLA -- 16 CFR 501](#)
 - [FTC Regulations under the FPLA -- 16 CFR 502](#)
 - [FTC Regulations under the FPLA -- 16 CFR 503](#)
 - [Nutritional Labeling and Education Act \(NLEA\) Requirements](#)
 - [Uniform Packaging and Labeling Regulation](#)
- [Consumer Product Safety Improvement Act \(CPSIA\)](#)
- Environmental Marketing and Labeling Regulations
 - [Environmentally Friendly Products: FTC's Green Guides](#)
 - [FTC 16 CFR PART 260: Guides For The Use Of Environmental Marketing Claims](#)
- [Federal Insecticide, Fungicide and Rodenticide Act](#)
- [Grade "A" Pasteurized Milk Ordinance \(2019 Revision\)](#) – *please refer to Appendix J: FDA Standards for the Fabrication of Single-Service Containers and Closures for Milk and Milk Products*

State Rules and Regulations

- California's [Rigid Plastic Packaging Container \(RPPC\) Law](#)
- California's [Safe Drinking Water and Toxic Enforcement Act](#) ("Prop 65")
- California's [Toxics in Packaging Prevention Act](#)
- CONEG's [Toxics in Packaging](#)

Good Manufacturing Practices – Canadian Resources

- [IFS PACsecure \(Version 2\)](#)

Food Packaging and Materials – Canadian Resources

An overview of various resources related to food packaging materials in Canada may be found [here](#). Of particular interest will be:

- [Information Requirements For Food Packaging Submissions](#)
- [Guidelines for Determining the Acceptability and Use of Recycled Plastics in Food Packaging Applications](#)
- [Lists of acceptable polymers for use in food packaging applications](#)
- [Guidance for Food Establishments Concerning Construction Materials and Packaging Materials and Non-Food Chemicals](#)

Product Testing Standards

Foodservice packaging products are subject to a number of tests for a variety of reasons. Below is a listing of common tests used in the foodservice packaging industry:

- [ASTM Standard D6400: Specification for Compostable Plastics](#)
- [ASTM Standard D6868: Specification for Biodegradable Plastics Used as Coatings on Paper and Other Compostable Substrates](#)
- [ASTM Standard 6866: Specification for Determining Biobased Content](#)
- [CAN/BNQ Standard 0017-088: Specifications for Compostable Plastics](#)
- [ISO 16532-1:2008: Paper and board – Determination of grease resistance – Part 1: Permeability test](#)
- [ISO 16532-2:2007: Paper and board – Determination of grease resistance – Part 2: Surface repellency test](#)
- [ISO 16532-3:2010: Paper and board – Determination of grease resistance – Part 3: Turpentine test for voids in glassine and greaseproof papers](#)
- [Non-Intentionally Added Substances \(NAIS\) Screening for Food Contact Materials](#)
- [TAPPI 454 om-21: Turpentine Tests for Voids in Glassine and Greaseproof Papers](#)
- [TAPPI 559 cm-22: Grease Resistance Test \(KIT Test\) for Paper and Paperboard](#)

In addition to these external resources, please be sure to check out the voluntary technical standards and guidelines adopted by FPI's Foodservice Packaging Standards Council, also found on FPI's website in the Technical section on the "[Resources](#)" page.

Examples of Other Technical Resources for Foodservice Packaging

- Kosher Certification: [Orthodox Union](#)
- Halal Certification: [Islamic Food and Nutrition Council of America](#)
- Conference for Food Protection [Guidance Document for the Safe Reuse of Containers](#)

"Green" Certifications, Seals and Standards

Materials:

- [Programme for the Endorsement of Forest Certification](#)
- [Forest Stewardship Council](#)
- [Sustainable Forestry Initiative](#)

Products:

- [Biodegradable Products Institute](#)
- [Compost Manufacturing Alliance](#)
- [Green Seal's GS-35 Food Service Packaging](#)
- [GreenScreen Certified for Reusable Food Packaging, Service Ware, & Cookware](#)
- [Sustainable Biomaterials Collaborative's The BioSpecs for Food Service Ware: Environmentally Preferable Specifications for Compostable Biobased Food Service Ware](#)
- [U.S. Department of Agriculture's BioPreferred Program](#)

Markets:

- [Events Industry Council Framework for Sustainable and Socially Impactful Events](#)
- [Green Restaurant Association](#)
- [Green Seal's Healthy Green Hotels](#)

Other:

- [U.S. Green Building Council's LEED certification](#)

If there are other resources that should be considered for inclusion in FPI's Compliance Manual, please kindly send them to fpi@fpi.org. Thank you for your help.