

This year has seen a continuation of state activity surrounding sustainability and so-called “chemicals of concern” in packaging, coupled with new, unique challenges at the federal level. As compliance deadlines for state laws targeting familiar chemistries (e.g., PFAS, heavy metals) continue to take effect, new state legislative efforts have also emerged encompassing many other substances commonly used in the manufacture of plastic food packaging. At the same time, FDA’s focus on specific chemicals has escalated, taking aim at synthetic food dyes and many other substances as part of its revamped post-market review program. FDA also plans to depart from its long-standing interpretation of the “generally recognized as safe” (GRAS) exemption under the Federal Food, Drug, and Cosmetic Act, which could introduce sweeping changes to the regulatory framework for substances used in food packaging. The presentation will include updates on these developments and the expected effect of these state and federal efforts on colors for plastics.