

**Invitation Letter to BTSF National Contact Points seeking applications for
BTSF training activities on
the Audit of authorised recycling processes for
plastic food contact materials in the scope of Regulation (EU) No 282/2008
(superseded by Regulation (EU) 2022/1616)**

Service Contract 2018 96 02

Phase 1

Valid as of 01/07/2023

1. Course objectives.....	2
2. Training dates and locations.....	3
3. Selection criteria for participants	4
4. Country allocations.....	6
5. Face-to-face logistical arrangements	7
Annex 1: Background and main topics covered in training	8
Annex 2: Legislation and guidance	9
Annex 3: Agenda.....	10
Annex 4: Training material, outcomes and dissemination activities.....	11
Annex 5: Contractor contact details.....	12

1. Course objectives

General objective

The aim of the training on auditing of authorised recycling processes for plastic food contact materials in the scope of Commission Regulation (EU) 2022/1616 (repealing Regulation (EU) 282/2008) is to raise awareness on all aspects of the plastic food contact materials and auditing plastic recycling processes. The course also aims to ensure a harmonised and in-depth understanding of the EU requirements for effective implementation of the EU legislation as well as to enhance the uniformity of procedures across the EU Member states.

Specific objectives

- to ensure a clear understanding of the different types of plastics used in food contact materials (FCM), an insight into the process of migration and how migration can be mathematically modelled;
- to help participants to understand the potential sources of contamination in recycled plastics and how the basic principles of risk assessment are applied by EFSA in terms of authorisation of recycling processes;
- to provide deeper understanding of the EU legislation covering recycling, the various processes used for recycling of plastics, the possibilities to reuse plastics as food contact materials again;
- to understand the key points in undertaking an audit of a recycling plant, and be able to identify critical records that need to be provided for inspection;
- to put the theoretical training into a practical context and to provide a 'real-life' experience of typical environments that participants will experience during the field visit during the course.

2. Training dates and locations

One face-to-face training course will be delivered from 20 until 23 February 2024 with approximately **15 trainees**.

An introductory session after the lunch of the first day will be followed by 3 days of training. The course agenda is attached (Annex 3).

Table 1: Training Dates and Location

Year	Training session	Course title	Location	Dates	Registration deadline
2024	TS06	Audit of authorised recycling processes for plastic food contact materials in the scope of Regulation (EU) No 282/2008 (superseded by Regulation (EU) 2022/1616)	Treviso, Italy	20/02/2024 - 23/02/2024	19/01/2024

3. Selection criteria for participants

- Participant must:
1. Fulfil the eligibility criteria
 2. Meet the minimum requirements
 3. Be selected using the evaluation criteria

1. Eligibility criteria for the course: Audit of authorised recycling processes for plastic food contact materials in the scope of Regulation (EU) 282/2008 (superseded by Regulation (EU) 2022/1616)

Applicants must be staff of competent authorities performing auditing of plastic recycling processes for food contact materials.

Only **eligible participants** should be further assessed against the minimum requirements below.

Participants must meet the minimum requirements below to ensure they can follow and fully participate in this course. Participants who do not meet the minimum requirements should not be proposed for the training.

2. Minimum requirements the course: Audit of authorised recycling processes for plastic food contact materials in the scope of Regulation (EU) 282/2008 (superseded by Regulation (EU) 2022/1616)

Yes/No

Participants must:

- have experience in auditing and other controls of recyclers including setting up audit plans
- have a good working level of English
- be inspectors of food, food contact materials and plastic recycling and covering premises, who will be involved in the actual audits and controls of recycling premises and if relevant down-stream users

The evaluation criteria should be used as a tool to prioritise participation (higher score indicates higher priority), but there is no minimum score necessary.

3. Evaluation criteria for the course: Audit of authorised recycling processes for plastic food contact materials in the scope of Regulation (EU) 282/2008 (superseded by Regulation (EU) 2022/1616)

Enter Score

a)	Experience in auditing of plastic recycling processes for food contact materials <u>Scoring</u> less than 3 years = 0 points; ≥ 3 years = 5 points; 5 - 10 years = 10 points; > 10 years = 12.5 points	
b)	Experience in implementing EU legislation within a competent authority in auditing of plastic recycling processes for food contact materials <u>Scoring</u> no experience = 0 points; < 2 years = 5 points; 2-5 years = 7.5 points; > 5 years = 10 points	
c)	Contribution towards very specific advanced outcomes in auditing of plastic	

	<p>recycling processes for food contact materials</p> <p><u>Scoring</u></p> <p>no experience = 0 points; < 2 years = 5 points; 2-4 years = 10 points; > 4 years = 12.5 points</p>	
d)	<p>During the course, participants will be provided with a training package to be used as support dissemination material. Commitment to disseminate the knowledge received is a prerequisite for course participation.</p> <p><u>Scoring</u></p> <ol style="list-style-type: none"> 1. Commitment to distribute the training material among their colleagues = 5 points; 2. Point 1 plus preparing and giving presentations based on the training material for the staff of national competent authorities/uploading training material to national competent authorities' intranets/websites = 10 points; 3. Points 1, 2 plus preparing informative articles in the professional national journals = 15 points; 4. no commitment = NO INVITATION 	
Maximum total score		50

4. Country allocations

A total of 15 seats will be allocated according to the table below for the upcoming training session in Treviso, Italy. Please note that the number of allocated seats per country for the period is indicative.

All NCPs are encouraged to provide as many applicants as possible for each training event. Even if a country does not have allocated seats for the period per the tables below, the NCP may still send applicants. Any excess applicants will be considered as reserves and activated as feasible.

Table 2: Suggested allocation for EU Member States and Candidate Countries

	country / suggested allocation					
Member States	Austria	1	Germany	0	Poland	0
	Belgium	1	Greece	0	Portugal	0
	Bulgaria	1	Hungary	0	Romania	1
	Croatia	0	Ireland	1	Slovakia	1
	Cyprus	1	Italy	2	Slovenia	1
	Czechia	0	Latvia	0	Spain	0
	Denmark	0	Lithuania	0	Sweden	0
	Estonia	0	Luxembourg	1		
	Finland	0	Malta	1		
	France	1	Netherlands	1		
	Total Member States					14
Candidate Countries	Albania	0	North Macedonia	0	Türkiye	1
	Bosna and Herzegovina	0	Serbia	0	Ukraine	0
	Montenegro	0				
	Total Candidate Countries					1
Global participation EU Member States and Candidate Countries						15

You are welcome to nominate more participants for the reserve list than indicated in the table above. If seats will become available, you will be informed in due time.

5. *Face-to-face logistical arrangements*

This training sessions will be face-to-face. The European Commission will fund in full the visa, travel, accommodation, catering, and field visit costs for all training participants. No daily allowance will be paid on top of this. Any other costs are to be paid by the participants themselves.

Participants will arrive at the training venue on Tuesday before the events starts or on Monday afternoon/evening, depending on the travel options. The introductory session will be held on Tuesday afternoon followed by the first training activities. Return travel will be on Friday afternoon/evening after the training has finished or Saturday morning, depending on the travel options.

The NSF Euro Consultants event management team will liaise further with the nominated participants for all logistic and practical aspects.

Annex 1: Background and main topics covered in training

Background

It is very important to ensure that all food contact materials are safe in order to provide a high level of protection of consumer's health which is one of the fundamental objectives of the EU. The use of recycled plastic became increasingly common in recent years and therefore, called for new industrial processes which resulted in publishing Commission Regulation (EU) 2022/1616). Member States shall verify that the business operators strictly respect the requirements of the EU legislative framework and conditions of authorisation.

The integration of training activities on audit of plastic recycling process in the BTSF initiative is a means to promote the upgrading of inspectors' skills as well as improving the effectiveness and harmonization of official controls.

The following topics will be covered during the training session:

- Topic 1: EU legislation, risk assessment and authorisation process
- Topic 2: Plastic recycling process and quality system
- Topic 3: Audit of recycling premises

Annex 2: Legislation and guidance

1	EFSA Scientific Opinion on the criteria to be used for safety evaluation of a mechanical recycling process to produce recycled PET intended to be used for manufacture of materials and articles in contact with food - EFSA Journal (2011)9:2184
2	Guidelines on submission of a dossier for safety evaluation by the EFSA of a recycling process to produce recycled plastics intended to be used for manufacture of materials and articles in contact with food. EFSA Journal (2008) 717: 1-12
3	Regulation (EC) No 1935/2004 of the European Parliament and the Council
4	Commission Regulation (EC) No 2023/2006
5	Commission Regulation (EU) No 2022/1616
6	Commission Regulation (EU) No10/2011
7	Commission Regulation (EC) No 882/2004
8	European Parliament and Council Directive 94/62/EC
9	Scientific Opinion on the safety assessment of the process SOREPET, based on Buhler B technology, used to recycle post-consumer PET into food contact materials. EFSA Journal 2014;12(4):3631
10	Scientific Opinion on the safety assessment of the process “Greenfiber” based on VACUREMA Prime® technology used to recycle post-consumer PET into food contact materials. EFSA Journal 2014;12(6):3713.
11	Scientific Opinion on the safety assessment of the process “Petra Polimeri” used to recycle polypropylene trays and insert trays for use as food contact material. EFSA Journal 2014;12(7):3780
12	European Commission guideline document for industry and inspectors and Compliance Monitoring Summary Sheet (CMSS)
13	Regulation (EC) No 882/2004 of the European Parliament and the Council

Annex 3: Agenda

Training course on the audit of authorised recycling processes for plastic food contact materials in the scope of Regulation (EU) 282/2008 (superseded by Regulation (EU) 2022/1616)

Training Programme



Training Coordinator: GILBERT John (JGI), Key Experts: MILANA Maria Rosaria (MMI), FOISNER Johanna (JFO), PECHACKER Lisa (LPE), TILLIEUX Geoffroy (GTI) / VAN DEN DUNGEN Casper (CVA)

	Tuesday			Wednesday			Thursday			Friday			
	1. EU legislation, risk assessment and authorisation process			2. Plastic recycling process and quality system; 3. Audit of recycling premises			3. Audit of recycling premises			3. Audit of recycling premises			
8:30													8:30
8:45							LPE	3.2.	Preparation for audit: document check	GTI/ CVA	3.8.	Field visit - Practical exercise and debriefing	8:45
9:00				JFO	2.1.	Legislation concerning plastic recycling							9:00
9:15													9:15
9:30							JFO	3.3.	Declaration of Compliance (DoC) Annex II				9:30
9:45										JGI	3.9.	Feedback and conclusions Q&A	9:45
10:00							Coffee break			Coffee break			10:00
10:15				Coffee break			Coffee break			Coffee break			10:15
10:30							JFO & LPE	3.4.	Case study on document check	Dissemination module			10:30
10:45				JFO	2.2.	Timelines according to Regulation (EU) 2022/1616				Dissemination module			10:45
11:00							JFO & LPE	3.5.	Discussion on audit preparation	Final test of knowledge			11:00
11:15										Final test of knowledge			11:15
11:30				JFO & LPE	2.3.	Operation of processing technologies				HaDEA Online evaluation and training session conclusions			11:30
11:45										HaDEA Online evaluation and training session conclusions			11:45
12:00				Registration and lunch			Lunch			Closing session			12:00
12:15							Lunch			Closing session			12:15
12:30				Opening & welcome Introduction			Lunch			Lunch			12:30
12:45				BTSF initiative presentation			Lunch			Lunch			12:45
13:00				Training objectives and presentation of the training programme			Lunch			Lunch			13:00
13:15				Presentation and expectations of each participant									13:15
13:30				LPE	2.4.	Recycling from product loops which are in a closed and controlled chain	GTI/ CVA	3.6.	Field visit preparation: personal safety requirements and practical activity on recycling premises documentation				13:30
13:45													13:45
14:00	MMI	1.1.	Overview of food contact materials and migration	JFO	2.5.	Novel technology	Trip to the field visit's premises						14:00
14:15							Trip to the field visit's premises						14:15
14:30	JGI	1.2.	Information exchange by participants and discussion about plastics waste collection and recycling operations in their respective countries	LPE	2.6.	Compliance Monitoring Summary Sheets (CMSS)	Trip to the field visit's premises						14:30
14:45							Trip to the field visit's premises						14:45
15:00	MMI	1.3.	Specific risks and potential contamination sources in recycling material				Trip to the field visit's premises						15:00
15:15				Coffee break			Trip to the field visit's premises						15:15
15:30				Coffee break			Trip to the field visit's premises						15:30
15:45							Trip to the field visit's premises						15:45
16:00	MMI	1.4.	Specific EU provisions on recycled plastics materials and articles intended to come into contact with food	LPE	2.7.	Practical exercises – CMSS checks	GTI/ CVA	3.7.	Field visit to a plastics recycling plant, implementing a quality assurance system				16:00
16:15													16:15
16:30	MMI	1.5.	Recycling process authorisation and EFSA safety assessment				Trip to the field visit's premises						16:30
16:45							Trip to the field visit's premises						16:45
17:00				LPE	3.1.	Audits in theory and practice	Trip to the field visit's premises						17:00
17:15							Trip to the field visit's premises						17:15
17:30	MMI	1.6.	Practical exercise on safety assessment of recycling process applications				Trip to the field visit's premises						17:30
17:45				Feedback and day conclusions Q&A			Trip back to the hotel						17:45
18:00							Trip back to the hotel						18:00
18:15				Feedback and day conclusions Q&A			Feedback and day conclusions Q&A						18:15
18:30							Feedback and day conclusions Q&A						18:30
18:45							Feedback and day conclusions Q&A						18:45
19:00				Welcome cocktail			Social activity (visit of the city and dinner)						19:00

general points in orange	plenary sessions and theoretical modules in white	practical modules in green	field visit in blue
--------------------------	---	----------------------------	---------------------

Annex 4: Training material, outcomes and dissemination activities

Training material

Face-to-face format

Participants will receive in advance the training material to be used during the F2F training sessions. The following materials of relevance to the course will be uploaded and made accessible on the BTSF Academy:

- Modules Description & Syllabus
- all theoretical presentations
- any materials needed to prepare for the practical modules

Printed training material can be provided upon participants' request received at least 30 days before the training week. The paperless BTSF trainings are in accordance with the European Commission's policy on "going paperless", and with the Commission's Green Deal.

During the training week, participants will be regularly divided to work on different exercises and case studies within smaller groups. The results from the practical activities (case studies, exercises, open discussions) will be shared with the group right after the end of the training.

All participants will receive a Dissemination Kit electronically to enable them to actively disseminate course knowledge upon their return from BTSF training.

Dissemination kit

This contains the following training materials:

- All course presentations
- Study notes on field trips and group activities/discussions and conclusions thereof
- The course syllabus
- The training information sheet
- Glossary of terms and abbreviations used in the course
- Additional references for further study
- Written guidance on how to actively disseminate course knowledge to colleagues upon participants' return to their home countries, different methodologies/examples/best practice
- Other information and material delivered at the course such as quizzes, FAQs etc.

Dissemination questionnaire

Two to three months after the respective training session, participants will receive a standard questionnaire requesting information on the dissemination activities of the participant after the training, and details on differences in the approach adopted in day-to-day work following the training.

Self-assessment test

Furthermore, the programme will include an anonymous knowledge test to be carried out at the beginning and at the end of each training session in order to measure the impact of the training on the understanding of the participants of the subjects taught.

Participants are expected to agree to carry out the above tests and to reply to the surveys and questionnaires.

HaDEA Online Evaluation

Feedback on each training session will be collected through the HADEA on-line evaluation survey, completed by all participants at the end of the training. The Event Management Team will provide instructions to the participants how to access and fill out the survey through the BTSF Academy. Trainees will be asked to evaluate the course in several aspects: performance of tutors, technical coverage and training materials, networking and interaction opportunities provided during the training, relevance of the topics to their everyday work, reaching the training objectives.

Personal data protection

Consent to carry out the above tests and to reply to the surveys is a prerequisite for participation in the training. Participants agree to be registered in the BTSF Academy and to take a group photo of the participants and tutors at the end of the training. Photos will be published in the BTSF Academy in the corresponding training course section and will be visible only to registered users of the BTSF ACADEMY.

NSF EC will process personal data only with the explicit prior consent of each applicant/participant. A specific Personal Data Consent Form will be provided to each BTSF applicant at the outset of their communication with the EMT.

Please find more information regarding data protection here:

<https://btsfacademy.eu/training/mod/page/view.php?id=417>

Annex 5: Contractor contact details

The Project is managed by: NSF Euro Consultants

Project Manager: Ms. Yana Elenkova

Training Coordinator: Dr. John Gilbert

Separate notifications will be sent to National Contact Points for each course and will contain the names and contact details of the Event Manager and Assistant Event Manager as well as logistical details on the event.

All official communication between National Contact Points and the Project team will be maintained through the functional e-mail address 2018.96.02-PR@nsf-ecg.com.

All information on the BTSF training can be found at the [BTSF Academy](#) website. This website will be regularly updated with details of forthcoming courses.