Recycled Paperboard Technical Association
Recycled Paperboard Alliance

RPTA Compliance Program
October 17, 2017
Member driven industry organizations

Goal = promote & ensure purity of recycled paperboard

RPA = Brand Owner Focus Certification Program

RPTA = Member Mill Focus RPTA Comprehensive Program
What is the RPTA/RPA Compliance Program?
What is the RPTA/RPA Compliance Program?

• Developed by RPTA and outside consultants
  • Keller and Heckman
  • Cardno ChemRisk
  • ALS Laboratories
  • FDA

• Contains the elements mills need to put in place to demonstrate regulatory compliance
Compliance Program

• Enables Mills to demonstrate compliance with Federal Regulations
  • 21 CFR 176.260
  • 21 CFR 176.170
  • 21 CFR 176.180

• Program also addresses California Proposition 65 requirements for food contact applications
Compliance Program

21 CFR 176.260

“sources of reclaimed fiber may be either ‘industrial waste from the manufacture of paper and paperboard...’ or ‘salvage from used paper and paperboard....’. In both cases, the regulation stipulates that the material may not bear or contain ‘any poisonous or deleterious substance...that migrates to the food except as provided in the regulations....’.”
Comprehensive Program – Evergreen Document

Potential Chemicals for Testing

Comprehensive Trace Analysis (CTA)
- Naturally occurring in wood pulp?
  - Yes
    - Confirm TiC
      - No
        - Not a candidate
      - Yes
        - Not a candidate
  - No
    - Q < 80%
      - Confirm TiC
        - No
          - Not a candidate
        - Yes
          - Likely candidate

Industry Knowledge
- TSCA
- Prop 65
- CEPA
- Reach
- EU Food Packaging Regs

Contaminant Assessment:
Is chemical likely to be in recycled paperboard:
- Component used in papermaking?
- Could be in contact with waste paper?
- Chemically stable, etc.?

High Profile Chemical
- Media
- NGO
- Customer

- Prop 65
- NSRL or MADL

Health Risk Assessment and development of Allowable Concentration

Calculate AC
Comprehensive Program – Evergreen Document

- TSCA
- Prop 65
- CEPA
- Reach
- EU Food Packaging Reg.'s
- Heavy Metals
- PAH’s
- PCB’s
- Pesticides
- Phthalates
- Semi-VOC’s
- VOC’s
Program Implementation

Mills implement the elements of the program

These include:

- Establishing GMP’s
- Inspection of incoming furnish
- Use of additives with regulatory clearances
- Testing of final products for impurities
- Testing for microorganisms
Comprehensive Program - Certification

- 2010: Recyclable Symbol Trademarked
- 2011: Certification Launched
- 2014: RPTA Certification
- 2016: RPTA/RPA

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Why Certification

• Association wants consistency of implementation among the member companies. This assures that mills are doing the same things according to the program.

• Certification is a way to validate that mills are following the program as specified.
Benefits of Using Certified Board

If you specify paperboard produced in a mill that has achieved RPTA certification you can communicate to your customers that the paperboard in your products comply with FDA CFR 176.260, 176.170, 176.180 and California’s Prop 65 regulation.
Lou Pezet

• Contract Auditor for NSF/ISR (RPA 100% and RPTA Protocol)
• Contract auditor for NSF Sustainability Programs (SFI and PEFC)
• Contract Senior Lead Auditor for SCS FSC Chain of Custody

• What is an independent audit?
• Why are independent audit reviews required?
NSF’s Foundation

In 1944, NSF was founded as the National Sanitation Foundation in the University of Michigan’s School of Public Health.

Today, we are now NSF International, with corporate headquarters in Ann Arbor, MI, USA, and 51 office and lab locations worldwide.
Who is NSF/ISR?

NSF International Strategic Registrations

(NSF-ISR) offers comprehensive management systems registrations to internationally accepted standards for quality assurance and environmental protection for the automotive, aerospace, forestry, chemical, medical, mining and manufacturing industries.
What are the elements of an audit?

- Planning communications including scope, required documentation, process review prior to the site visit.

- The site review includes Introductions, verification of compliance to the details of the standard, documentation/evidence, a closing meeting including and Corrective Action Reports (CARs) or Observations and next steps to resolve or close the issue.
What are the elements of an audit?

- These elements are good for internal audits to prepare for an independent review.

- The independent audit provides verification of compliance and the CAR process helps all members to conform to the same level.

- Confidentiality is always protected. The information gathered during an audit is not shared between members. Typically a governance committee reviews the results and resolutions of the CARs.
Independent audits verify compliance of participating Member sites

• Customers need proof that all members are following the programs equally.

• The independent audit allows an independent onsite review of the key elements of the program.

• The audit process has revealed not all members are interpreting the rules in the same way.

• The audit process identifies an area that may need clarification.
Independent audits verify compliance of participating Member sites

• Programs like the RPA 100% and The RPTA compliance program contain many details that all members agree to follow to improve the quality and safety of manufacturing processes.

• These process are then implemented by all participants at the plant level.
Conclusions

• As converters of products made from recycled paperboard we wanted you to understand the RPTA Comprehensive Program and the certification process so you can discuss these with your customers.

• Many brand owners rely on the RPTA comprehensive program to ensure the purity of recycled paperboard for the packaging used for their products.

• By specifying RPTA certified board you can communicate to all your customers that your products are made with the highest quality recycled paperboard available.
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