



Quality Assurance Considerations for Toxics in Packaging

Any company that sells or distributes packaging, packaging components, or packaged products is responsible for compliance with state toxics in packaging laws, regardless of where the regulated metals originated. Based on the experiences of regulated entities, it has become very clear that packaging specifications and the assurance of suppliers are not always enough to ensure the quality of packaging materials.

The TPCH recommends that each company in the packaging supply chain – from packaging component manufacturers to packaging suppliers and product brand owners and distributors – develop a quality assurance system that addresses state restrictions on the use of heavy metals in packaging, or integrates these requirements into existing QA/QC programs.

What “due diligence” steps can your company take to ensure the quality of its packaging raw materials and supplies?

- ◆ Incorporate toxics in packaging requirements into [packaging specifications](#).
- ◆ Discuss toxics in packaging requirements directly with suppliers. Don't assume that suppliers have read and adhere to the packaging specifications, or know about restrictions on the use of heavy metals in packaging.
- ◆ Require suppliers to submit a [Certificate of Compliance](#) with supporting documentation. Ask suppliers to provide the analytical data on which they base their compliance claim. Require suppliers to submit new Certificates of Compliance with supporting documentation whenever their suppliers or raw materials change.
- ◆ Test the incoming feed stocks, packaging materials, and packaging components of all new suppliers prior to issuing a purchasing contract, using x-ray fluorescence analysis or conventional laboratory testing. Select laboratory sample preparation and test methods that result in full dissolution of the sample and analyze for **total concentration** of each metal. Test methods that only measure leachable metals are not appropriate. For more information on test methods, see [Frequently Asked Questions](#), [TPCH guidance on laboratory analysis](#), and TPCH report, [Laboratory Round Robin Test Project: Assessing Performance in Measuring Toxics in Packaging](#).
- ◆ Institute an on-going program for monitoring or “spot-checking” incoming raw materials or packaging components to make sure that heavy metals are not subsequently introduced into your packaging materials and supplies.