



GROUP DISCUSSION • 20 AUGUST 2025

Formulation of Future Directions for the Management of Food Contact Materials (FCM) – Towards Regional Convergence and Role of Codex

Background

This questionnaire was developed to guide group discussions among CCASIA members and regional food stakeholders with the aim to identify future actions that CCASIA can recommend to Codex for better guidance and oversight of Food Contact Materials (FCMs), with emphasis on feasible approaches of food regulatory cooperation.

Section 1: Regional Priorities and Common Needs

1. Shared Regulatory Gaps

Based on the discussion paper, which of the following are most urgent to address at the regional level in Asia to ensure better FCM oversight and alignment? (Select top 3)

- ☐ Lack of harmonized migration testing conditions
- ☐ No common documentation/Documentation of Compliance (DoC) format
- ☐ Gaps in NIAS screening and risk assessment methods
- ☐ Inconsistent oversight of recycled materials
- ☐ Fragmented exposure assumptions
- ☐ Other:

2. Priority Areas for Regional Alignment and Codex Input

What are the areas where CCASIA countries can most meaningfully align and contribute to Codex work?

- ☐ Shared definitions and horizontal safety objectives
- ☐ Joint approach to GMP and documentation practices
- ☐ Regional input to NIAS methodology
- ☐ Technical consensus on recycled material requirements
- ☐ Pilot contribution to “Codex-cleared application” list
- ☐ Other:

Section 2: Operationalizing Stronger Codex Guidance for the Management of FCM: Roles, Pathways, and Leadership

3. How would a phased approach according to Option C proposed in the discussion paper be operationalized:

Phased approach includes:

- Step 1: Commission a full discussion paper and circulate a Circular Letter (CL) to map frameworks (2025)
- Step 2: Convene an FAO/WHO expert meeting to develop baseline methods for NIAS and testing (2026)
- Step 3: Launch an Ad Hoc Task Force to draft guidelines, recycled materials guidance, and pilot a cleared applications list (2027–2029)

How can CCASIA contribute to enabling this pathway? (Select all that apply)

- ☐ Propose a regional contribution to the Codex discussion paper (e.g., regional gap analysis or position paper)
- ☐ Encourage Member responses to the CL with regional coordination
- ☐ Nominate regional experts to contribute to FAO/WHO meetings
- ☐ Propose leadership or co-hosting of the Task Force by a CCASIA country
- ☐ Support identification of pilot applications for the cleared list from the region
- ☐ Other:

4. Leadership and Coordination: To deliver the Phased Approach effectively, what type of leadership is required at each stage?

Phase	Who should lead or co-lead this work? (mark and/or specify)
Mapping & Discussion Paper (2025)	<input type="checkbox"/> CCASIA Coordinator <input type="checkbox"/> A volunteer country (specify):
Expert Meeting (2026)	<input type="checkbox"/> FAO/WHO <input type="checkbox"/> Regional expert group <input type="checkbox"/> Host country from CCASIA: <input type="checkbox"/> Other:
Task Force Phase (2027–2029)	<input type="checkbox"/> Codex Commission <input type="checkbox"/> CCASIA member country (please propose): Co-lead with non-Asia country (specify):

- 5. Readiness for Involvement:** Would your country or institution consider taking a leadership role or technical contribution to any of these phases (discussion paper, expert meeting, task force)?
- ☐ Yes, please indicate preferred area(s):
 - ☐ Not at this time
 - ☐ Possibly, pending internal consultations
- 6. Operational Enablers:** In your view, what mechanisms are needed to make the phased approach proposed in the discussion paper successful? (Choose top 2)
- ☐ Dedicated financial support or trust fund
 - ☐ Technical secretariat hosted by a volunteering country
 - ☐ Regional expert group under CCASIA
 - ☐ Transparent data-sharing platform
 - ☐ Involvement of reference labs and academic partners
 - ☐ Formal engagement of industry observers
 - ☐ Other: