

**A REVIEW OF THE ACTIVITIES OF
THE ADDITIVES AND MATERIALS GUIDANCE PANEL**

1993

G. Smith

Distribution

Mr. P.L. Clarke ✓
Mr. R. Beck
Mr. G. Brooks
Dr. R.A. Crellin
Mr. T.G. Mitchell
Mr. G.A. Read
Mr. E. Watt
Mr. J. Luke

503105403

BATCo document for Province of British Columbia 1 November 1999

1. INTRODUCTION

The Additives and Materials Guidance Panel has two prime functions concerning the use of substances by BATCo Operating Companies in the manufacture of tobacco products: They are:

1. To give advice on the acceptability of newly proposed additives and materials to ensure their use conforms to Company Guidelines. Here the Group is purely responsive and acts only to requests submitted. It is however Company Policy that a new substance can only be used once it has been assessed by the Panel, and
2. To obtain at regular intervals, currently 6-monthly, Product Data Sheets listing all additives and components used on all BATCo tobacco brands in current production. As resources allow, details on these substances are obtained and reviewed against up to date guidelines. This process acts as a safety net for additives in use that may not have been submitted and those that have a history of use but would not have been assessed against current guidelines e.g. flavours that have been in use for many years and cigarette inks which in the past were not assessed by the Panel.

During 1993 the majority of the effort was spent on item 1 in the assessment of new proposals. The number of requests was a record and approached one proposal for every day of the year.

The section also provided support to Operating Companies including those who were in discussions with their Government over the use of additives.

This review summarises the business of the AMGP against this background and outlines the submissions made and their source. Activities carried out in support of the decisions made are also outlined.

During 1993 there were three formal meetings of the AMGP where recommendations were made and minuted.

503105404

2. THE STATISTICS

The trend of an increase in the number of requests for advice continued during the year with the receipt of 354 proposals, almost one for every day of the year. Of these 277 were for additives (Figure 1) and 77 for materials.

The advice was requested by:

BATCo. Operating Companies	46%
BATCo. Head Office Departments	34%
CAC Countries	20%

As in the past flavour agents were the largest single category forming 62% of all submissions. The range of additives and materials proposed and their source is summarised in Figures 2-10.

3. THE ADDITIVES

Additives are those substances that are deliberately added in the manufacture of tobacco products. The product is the part used by the consumer and excludes the pack.

3.a FLAVOURS & CASINGS

In the late 1980's and early 1990's the increase in Panel business was mainly due to a retrospective evaluation of flavours in current use. These were as disclosed in the regularly updated product data sheets. However, this source had hardly any impact on the number of flavours assessed in 1993 thus this continued increase in numbers was a reflection of greater activity by Operating Companies.

Consideration of the figures shows that ITC, Souza Cruz, Malaysia and BTC were particularly active in this area.

In assessing the acceptability of flavours the procedure was modified during the year as follows:

- a) there was a trend for increasing support from specific tobacco legislation notably the German Tobacco Ordinance, the historic French tobacco legislation and the US food laws.
- b) greater use of quantitative data on individual flavour agents either from routine disclosures or follow-up requests to suppliers. Levels of use were compared with levels stated in legislation such as the Council of Europe Blue Book.
- c) during the year those substances specifically prohibited in certain laws were reviewed their major natural sources

503105405

identified and the methods for their analysis established. As a result, certain flavours were analysed to ensure that they conformed to our Guidelines.

3b. INKS

Until recently, the view had been taken that the quantities of cigarette die inks used were so small as to obviate the need for their review except for a purchasing requirement of conformity to SBPIM standards. Whilst the level of use is still recognised as being low, it is now considered necessary to assess these inks and as such formal disclosures are now requested from suppliers.

During the year assessment of disclosures increased awareness of the composition of inks and their status in key legislation. This process was instrumental in developing an assessment procedure used to determine the acceptability of a new ink. Such proposals were discussed with major ink suppliers in the UK and Switzerland in order to obtain a view on the technical and commercial implications of the position taken.

4. MATERIALS

Materials are those substances used in manufacturing, including equipment that may enter the product in trace amounts through general wear and tear or by accident. They are not deliberately added to the product.

The range of materials submitted during 1993 is presented in Figure 10.

Requests for the assessment of materials were unevenly distributed with 56% coming from BATCo. Head Office Departments, 34% from BATUKE and only 10% from other BATCo. Operating Companies (7%) and CAC Countries (3%).

It is not known if this distribution was a true reflection of need or is one of awareness.

503105406

4a. BELTING MATERIAL

Close cooperation with Technical Services has resulted in the submission and approval of a number of belting materials from several international suppliers.

All submissions were assessed by taking into account the acceptability of the material for indirect food use as well as consideration of the consequences of accidental inclusion of belting material in the product.

As a result of this work, which is continuing, a range of belts from a number of suppliers with worldwide distribution networks have been approved.

The analytical procedure established in 1992 continues to contribute valuable data used in the assessment of all belting materials in 1993.

4b. NEW MATERIALS

Proposals from PP&D related to the application of materials not used in traditional processing. They included ceramic blades for tobacco cutting and a number of resin composites that may possibly be used to advantage in the construction of processing equipment.

Evaluating such materials is challenging due to the total absence of awareness by the supplier of the information required. Unfortunately this can lead to extended delays in progressing such proposals through the Panel.

4c. WALL AND FLOOR COVERING

During 1993 the Panel assessed a series of materials for coating/sealing floors and walls either as sheet material or applied resins.

During this assessment it was noted that at least one supplier used pigments and fillers containing heavy metals.

It is highly desirable to avoid such an introduction of heavy metals into the factory and office environment as their use is being controlled more and more by legislation. This will cover such issues as product contamination plus environmental concerns when the material needs to be disposed of during any refurbishment.

A guidance note was produced to identify to Operating Companies the need to check with flooring suppliers on all new developments.

For resin based sealants an incident in the food industry has shown that incorrect application could result in serious taint problems. It was

503105407

recommended by the Panel that suppliers and fitters confirm that they are aware of the consequences of incorrect application of floor and wall coatings of this type.

4d SEALANTS AND VALVES

A number of materials designed to perform the following function were considered during the year:

- a) act as valve seals
- b) close gaps between sheets of metal
- c) make good joints between pipes carrying essential services

Materials were often introduced during building work or refurbishing a production facility such as during routine maintenance. As such these materials may be used on machinery involved in the direct processing of tobacco and introduced onto the site by contractors. This may increase the possibility that they may be used without the consequences being evaluated.

As a basic requirement the Panel requires that all sealants used should be acceptable for use in food manufacturing areas. Where the Panel were aware of the use of sealants by contractors several were identified as not meeting this criterion.

Certain valves proposed for supply lines were recognised as containing PTFE (Teflon) and the Panel confirmed its recommendation that this material must not be used in machinery associated with the processing of tobacco however remote.

4e ANCILLARY EQUIPMENT

An incident involving ancillary equipment alerted the Panel to the consequences of a fire in a production area. In particular the contribution of ancillary equipment to such a fire was evaluated and the dangers of introducing unacceptable materials, e.g. during routine servicing, recognised. As such the possibility of a fire, however remote, is now considered when assessing new proposals.

503105408

5 **SUPPORT ACTIVITIES**

a) **AMGP DATA BASE**

The AMGP data base lists all chemicals used to formulate all flavours proposed for use on BATCo. brands. Over 1300 chemicals are listed, although not all are used, along with their status in key food and tobacco laws.

During 1993 this data base was updated to reflect the changes in the UK tobacco guidelines (see 5c).

In addition, introduction of non-tobacco additives onto the data base started in 1993. The support software was upgraded to reflect this greater requirement.

b) **LEGISLATION**

i) **THE UK INDEPENDENT SCIENTIFIC COMMITTEE ON SMOKING & HEALTH**

In 1992 it was agreed that the UK industry would, through what was then TAC, assist the department of Health obtain an electronic version of the data base listing the tobacco additives approved by the ISCSH. This was to replace their existing card file system.

During 1993 this data was brought together and reviewed at several meetings such that a complete list was produced by the end of the year.

It is understood that when minor issues on chemical nomenclature are resolved the Department of Health will announce the availability of this updated list of UK approved tobacco additives.

- ii) The Section has continued to provide advice and data in support of Group Companies in their discussions with Governments. In particular advice has been given to Companies in Germany, Hungary and New Zealand.

c) **INFORMATION GATHERING**

There continues to be a great deal of activity in a number of countries relating to the use of additives in consumer goods.

Thus when evaluating new proposals it is essential that the section is aware of the issues that may influence the assessment process.

503105409

Within BTC the Library Information Service provides an essential service in providing up to date reviews on a wide range of requests.

In addition membership of three professional bodies provides important back-up to our in-house facility. Our long standing association with BIBRA continues to be of great value whilst recent membership of the British Essence Manufacturers Association (BEMA) has proved to be an important source of data.

A broader perspective on legislation is obtained from the World Food Regulation Review.

6 INTERIM POSITION 1994

- a) The high level of activity particularly on additives is continuing in 1994 with over 300 requests received by July. This increases demands on existing resources and emphasises the need to ensure that the section is making optimum use of its time and people.

It is also recognised that the work practices have evolved with time and thus may not be the most efficient. In order to assess the procedures followed by the section, external consultants were invited to review our work practices and report on their findings. Recommendations are being assessed fully and where appropriate implemented.

- b) The assessment of inks is continuing increasing our understanding of ink composition, legislation and technical limitations. Contacts with key ink suppliers has been extended and one supplier visited so far this year.
- c) With an ever increasing work load particularly of flavours, it is essential that only those flavours with a level of commercial promise and full legislative support are considered. This latter point in particular will be discussed with suppliers to BAT. Preliminary discussions with two major suppliers took place earlier this year.
- d) Whilst it is recognised that as broad a legislative base as feasible is desirable in support of the substances used, it is also desirable to carry out our own analysis to increase further support for additives and materials use. Consideration is being given to procedures designed to increase understanding of inks, adhesives and paper whilst the analyses of belting materials and specific flavours will continue as necessary.

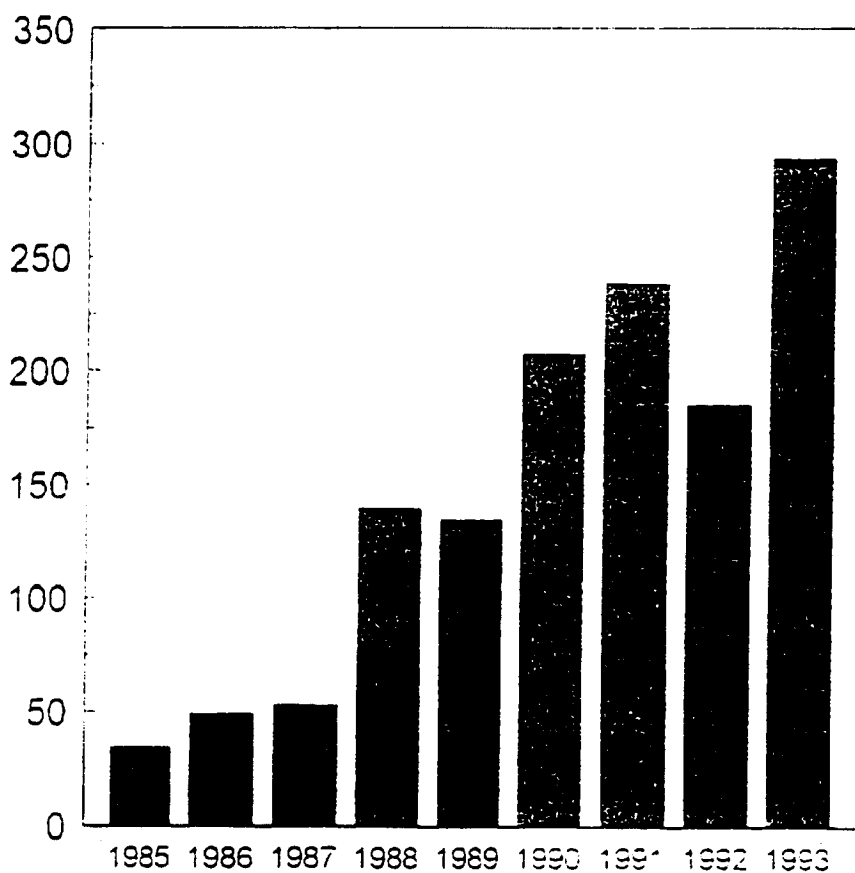
503105410

- e) Every opportunity will be made to advertise the activities of the Panel such that Operating Companies are aware of their responsibilities in requesting advice on new additives and materials. This will ensure that advice can be made available in a constructive and timely manner. The late introduction to projects and the request for an urgent assessment late in the project's life continues to be, on occasions, a problem and must be avoided by involvement of the section sooner rather than later.
- f) The increased work load and the increasing range of the business of the section made possible due to an increase in resources emphasises the need for closer management of the work. Procedures will be determined and implemented in order to maximise our resources and produce an efficient service to BATCo. Operating Companies. However, the setting of priorities remains an issue and increase dialogue with those requesting advice may prove essential in order to tackle the most important tasks in a timely manner.

503105411

FIGURE 1

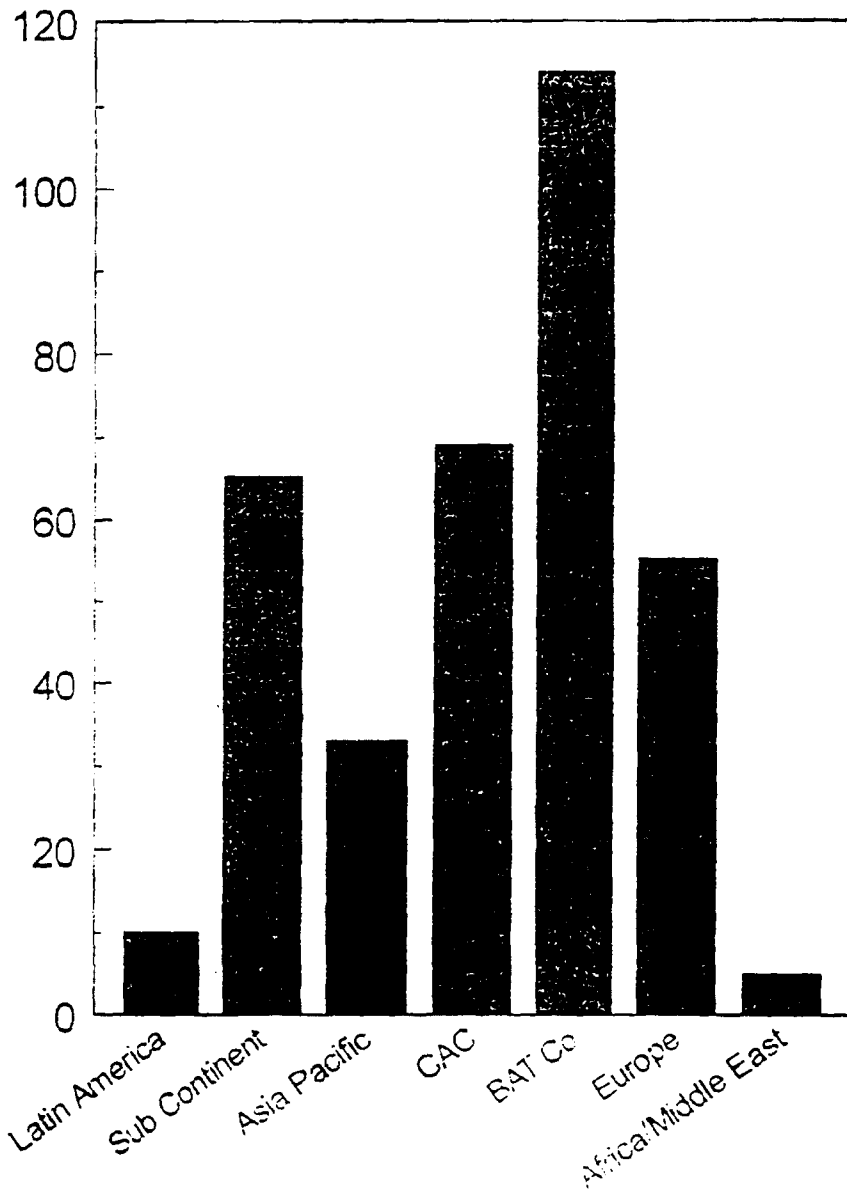
The number of requests for additives to the AMGP 1985 - 1993



503105412

FIGURE 2

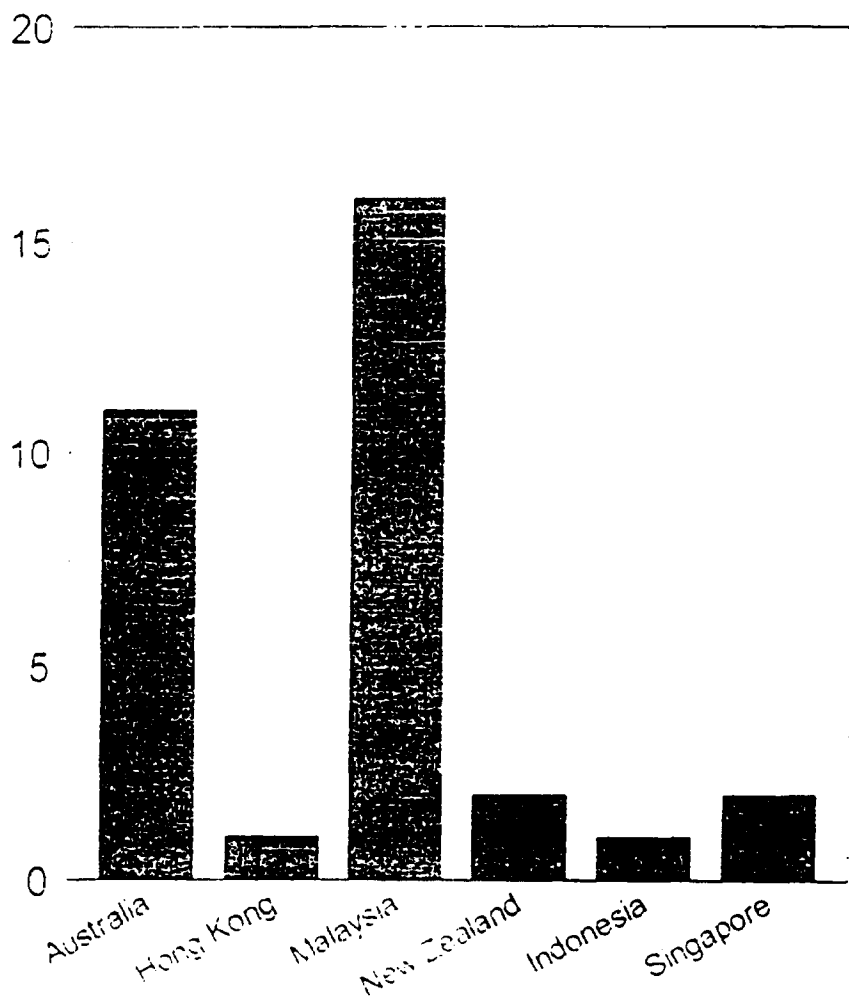
Source and number of requests for 1993



503105413

FIGURE 3

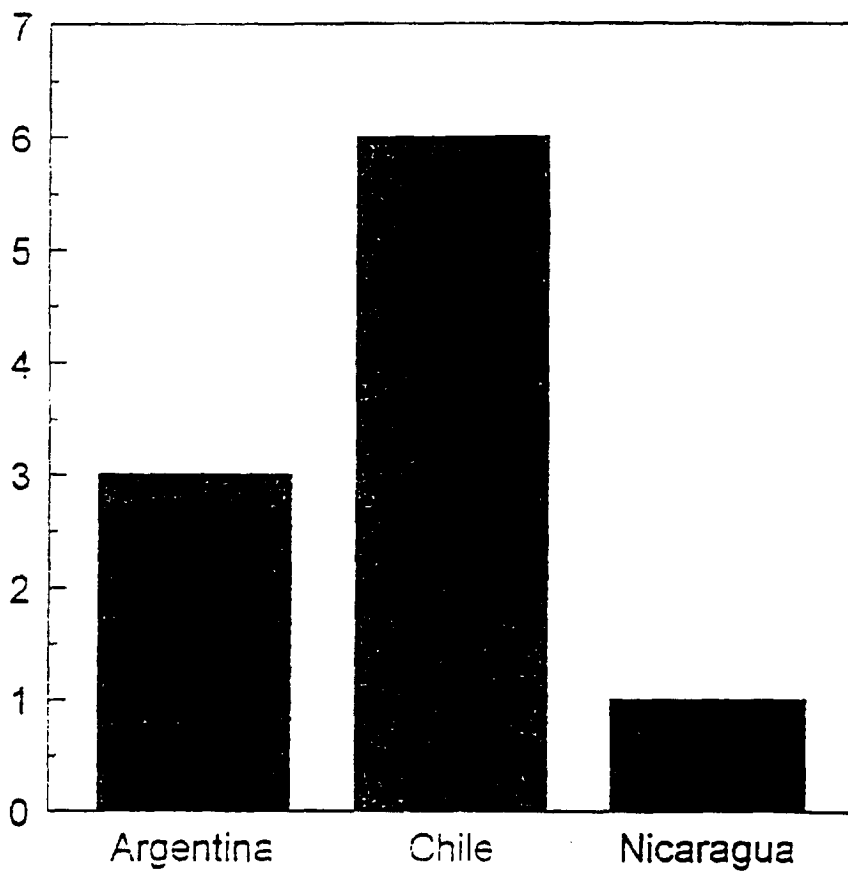
Source and number of requests for 1993
Asia Pacific



503105414

FIGURE 4

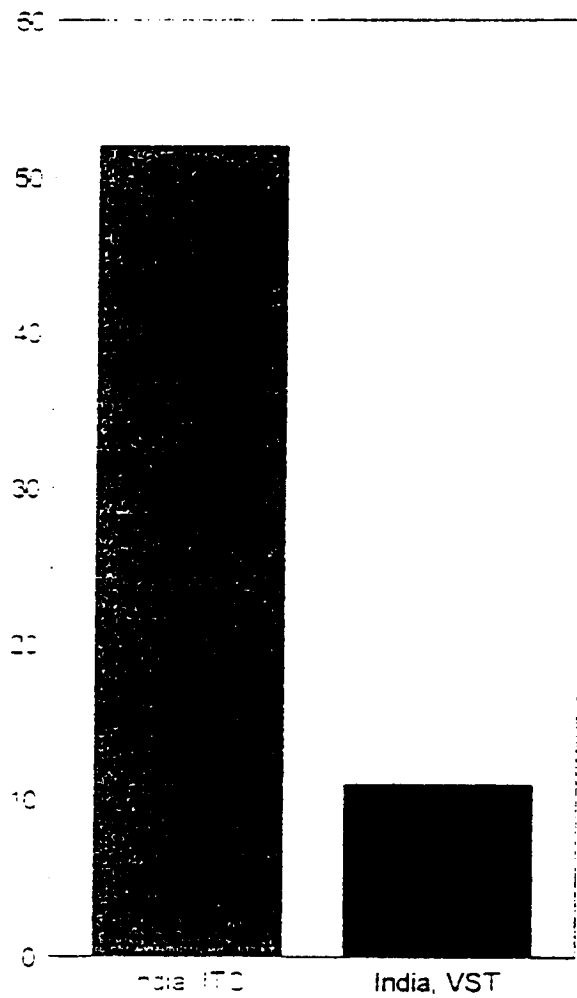
Source and number of requests for 1993
Latin America



503105415

FIGURE 5

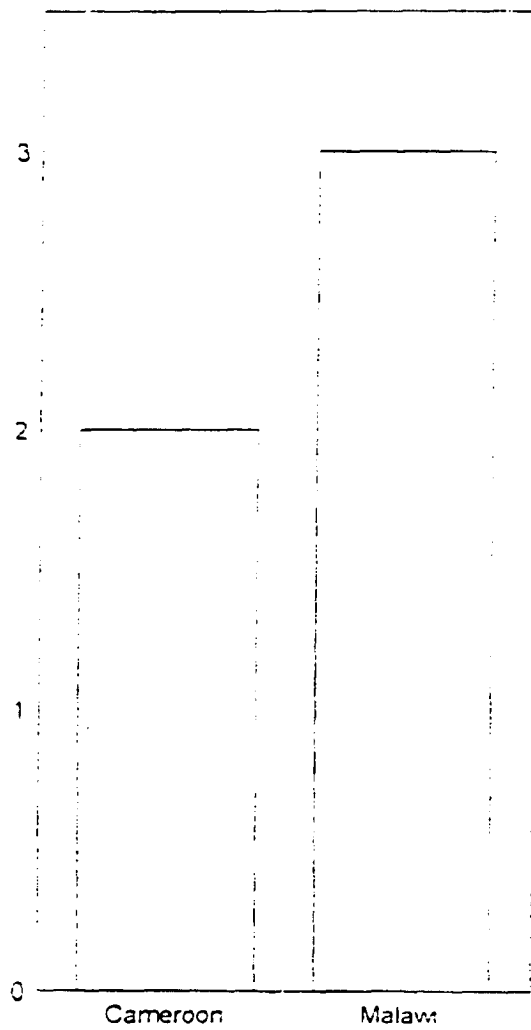
Source and number of requests for 1993
Sub Continent



503105416

FIGURE 6

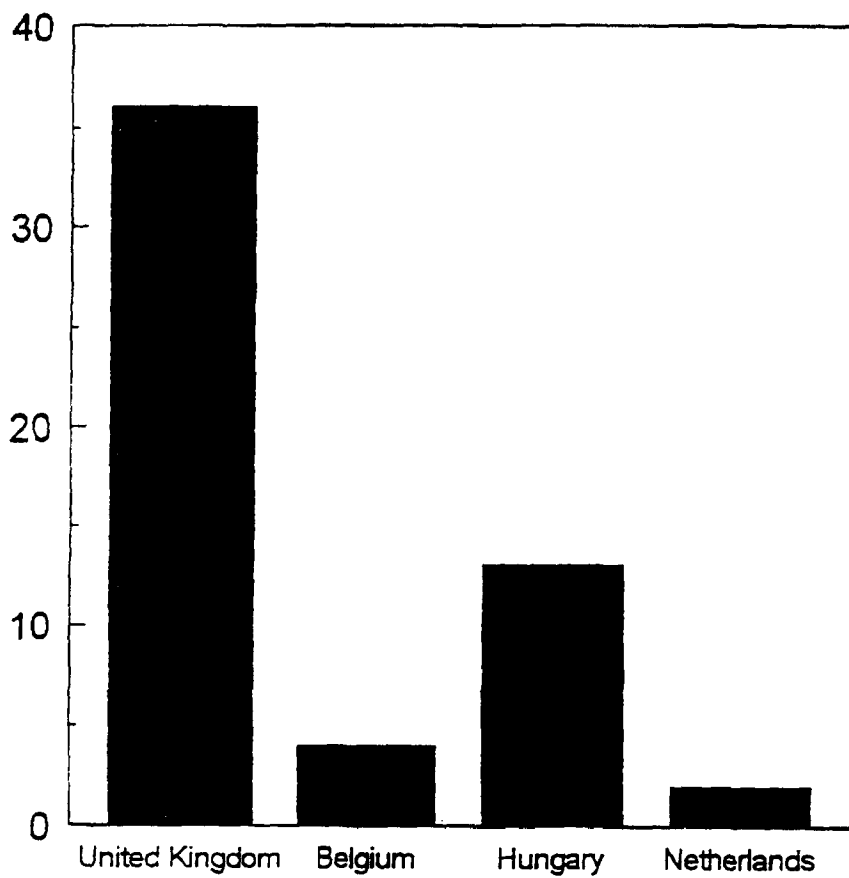
Source and number of requests for 1993
Africa / Middle East



503105417

FIGURE 7

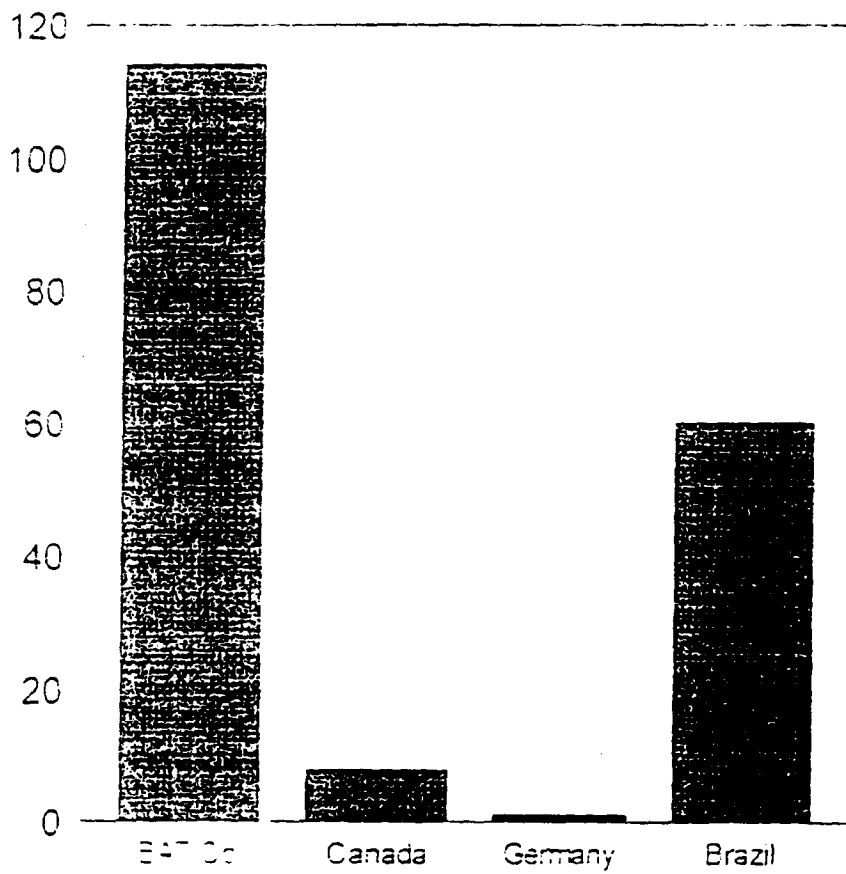
Source and number of requests for 1993 Europe



503105418

FIGURE 8

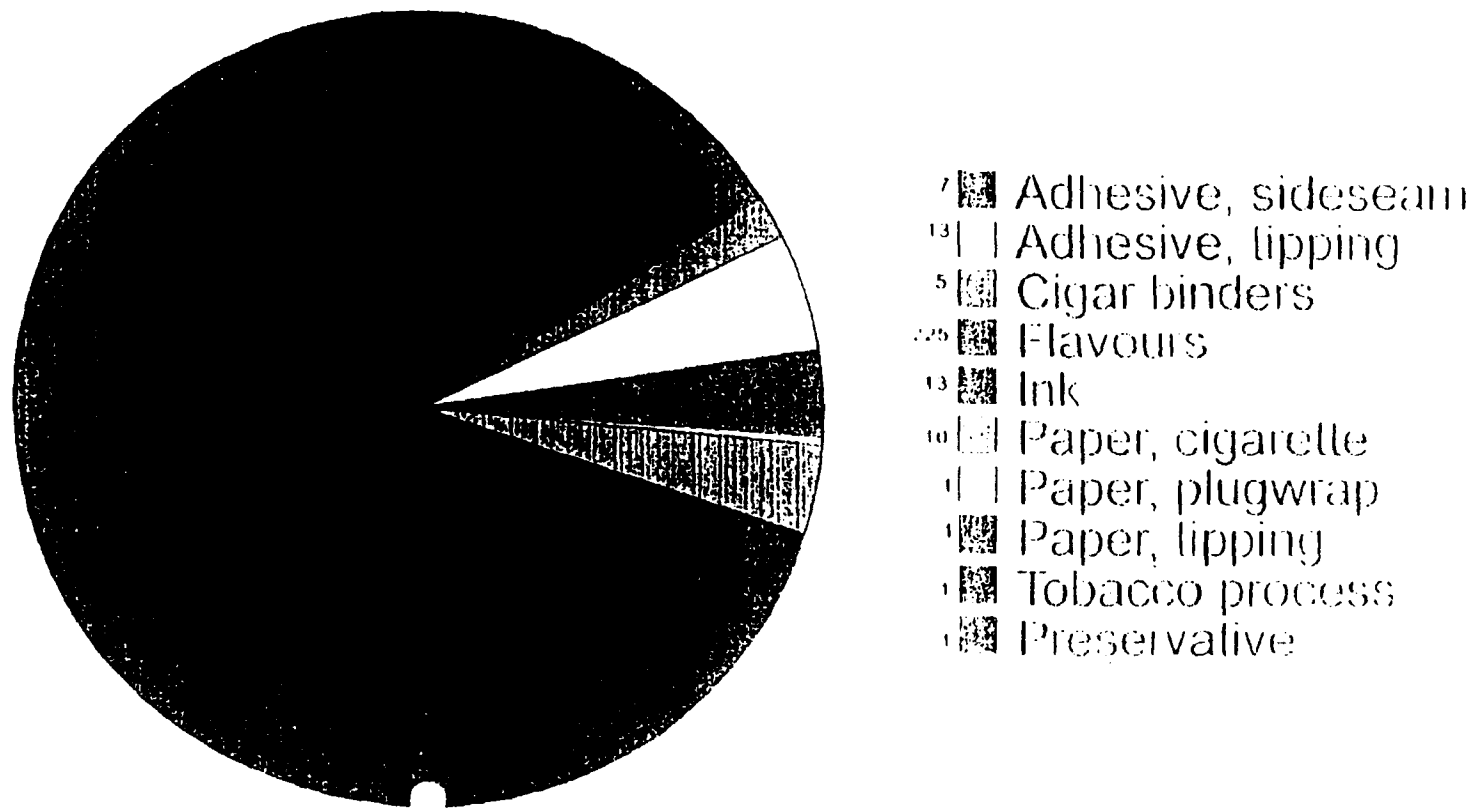
Source and number of requests for 1993
BAT Co Departments and CAC Countries



503105419

FIGURE 9

Category and number of additive requests for 1993



503105421

FIGURE 10

Category and number of material requests for 1993

