Guidelines on the Use of Disposable Tray Liners

Purpose

The guidelines provide recommendations to help the trade preventing food contamination due to the use of disposable tray liners (tray liners). The guidelines are applicable to all food premises where tray liners are used.

Background

2. For convenience sake, many patrons of fast food restaurants may allow food, such as French fries, or sauce, such as ketchup, to be in direct contact with tray liners. This practice raised food safety concerns.

3. The constituents from the tray liners, such as additives in the printing inks, may migrate into the food when they come into contact. Whether these chemicals would pose health risk or not depends on their nature and amount migrated, as well as the amount of chemicals an exposed individual eaten.

4. Nevertheless, the main purposes of using tray liners are for keeping food trays clean, or for advertisement and promotion purposes. The criteria of selection of raw materials and production of the tray liners may differ from those of food packaging materials or containers. Therefore, food should not be in direct contact with tray liners.

5. Although there is no specific legislation governing the use of food contact materials or tray liners, the Public Health and Services Ordinance (PHMSO) Cap 132 stipulates that all food offered for sale in Hong Kong must be fit for human consumption. Should the food be rendered unfit for human consumption due to problematic food contact materials such as papers, containers, tableware, utensils, or packaging materials, it would be an offence to offer such food for sale.
Advice to Trade

6. The trade is advised to make reference to the followings to avoid tray liners being a source of food contamination -

- Do not put food directly on tray liners.
- Print a warning statement on tray liners or display a warning notice at a conspicuous site in the food premises, such as “please do not put food directly on this tray liner”.
- Provide containers for sauce dipping when applicable.
- For intended use of tray liners for food contact, make sure that the constituents from tray liners will not migrate into the food causing food safety or quality concern.
- Obtain tray liners from reliable sources and maintain proper records to enable source tracing when required.

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December 2009