

# Updated guideline on food packing inks and varnishes

EuPIA provides guidance to its members and their customers



**Food packaging must be manufactured such that it does not transfer its constituents to the packed foodstuffs in quantities which could endanger human health, cause an acceptable change in the composition of the food or inadvertently affect foodstuffs in terms of odour and taste.**

**T**hese general requirements are laid down in the European Framework Regulation (EC) No. 1935/2004 on materials and articles intended to come into contact with food.

Printing inks, once printed and dried/cured, on the non-food contact surface of a packaging material in contact with food become a component of this packaging and this packaging has to comply with the requirements of the Framework Regulation.

As with non-plastic packaging material, there is not yet any specific EU legislation concerning printing inks and varnishes for food packaging. In the current situation, EuPIA provides guidance to its member companies assisting them to contribute their respective share to the legal compliance of the final packaging.

## Guideline updated

The main document is the EuPIA "Guideline on Printing Inks Applied to the Non-food Contact Surface of Food Packaging Materials and Articles", which was updated in November 2011. The guideline sets out a scheme detailing the criteria for the selection of raw materials to be used in the manufacture of food packaging inks and varnishes. This scheme also includes provisions on how to evaluate migration and assess the risk of so-called "non-evaluated" substances.

While it is the responsibility of the ink manufacturer to supply products that are fit for the intended purpose, the compliance of the printed packaging has to be demonstrated by the manufacturer of the packaging and the filler. The guideline specifies the type of information that the ink manufacturer provides to the converter to enable him to meet his legal responsibilities.

The guideline contains an annex with recommended laboratory practices to assess likely levels of migration. Although this does not replace any of the converters' legal obligations for compliance of the printed packaging, it allows for an evaluation of the suitability of ink formulations for the intended purposes. The annex includes provisions for the preparation of samples for indicative migration testing, describes the basic rules for migration testing both for plastic and for paper and board materials and articles, specifies the methods of migration testing, and sets out references for analytical methods. Where

appropriate, migration testing can be replaced by calculation of the maximum possible migration. Formulae to carry out these "worst case"-calculations are provided for conventional as well as for digital printing applications.

Finally, all food packaging inks must be formulated and manufactured according to Good Manufacturing Practices. This is also required by GMP Regulation (EU) No. 2023/2006. In this regard, EuPIA members are committed to follow the EuPIA "Good Manufacturing Practices for the Production of Packaging Inks formulated for use on the non-food contact surface of food packaging and articles intended to come into contact with food".

Although the Guideline already includes a scheme for the careful selection of raw materials, EuPIA additionally makes publicly available a list of all the raw materials used in the manufacture of food packaging inks, with the aim of implementing a transparent tool for packaging converters and brand owners. At the same time, the list is intended to become a reference for competent authorities.

## Swiss Ordinance now includes provisions for food packaging inks

Switzerland – as the first country in the world – had amended its Ordinance on Materials and Articles (SR 817.023.21) with provisions specific to food packaging inks. This regulation includes a list of "permitted substances", identifying the only substances which may be used in the manufacture of food packaging inks marketed in Switzerland. This list, which has been established with the support of EuPIA, became applicable as from 1 April 2011. A revised list was published in February 2011 and came into force in May 2011. Substances not currently included in the list of "permitted substances" may still be used, provided that a substance dossier containing the required data has been submitted to the competent Swiss authority, and the notifier has received confirmation of receipt of the dossier.

As this piece of legislation is quite complex and can be prone to misinterpretation, EuPIA provides guidance documents in a dedicated section of its public website. In particular, a FAQ document, published jointly by the Swiss Federal Office of Public Health and EuPIA, addresses relevant issues regarding substance evaluation and detection limits.

Germany follows suit planning to introduce printing ink specific provisions into the German Ordinance on Materials and Articles similar to those in Switzerland. EuPIA will issue guidance and make it available on its website, once the legislative initiative becomes more tangible. ◀



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