

Explanatory note for suppliers of ink raw materials regarding regulatory compliance of printed food packaging

Regulation (EC) No 1935/2004¹ requires that food contact materials and articles in their finished state must not transfer components to the packed foodstuff in quantities which could endanger human health or bring about an unacceptable change in the composition or deterioration in organoleptic properties.

Where substances from food packaging ink² raw materials have the potential to migrate, information needs to be communicated down the supply chain in order to assist printing converters and end users in determining regulatory compliance for printed food packaging. EuPIA have written this guidance note to assist suppliers of ink raw materials in understanding the need for, and the mechanism for regulatory disclosure to facilitate this communication.

As your customer is a member of EuPIA they will ask you to complete the EuPIA Raw Material Compliance Questionnaire or a similar document. The reason for this questionnaire is so that your customer can pass the required regulatory information to his customer such that an assessment can be made for regulatory compliance.

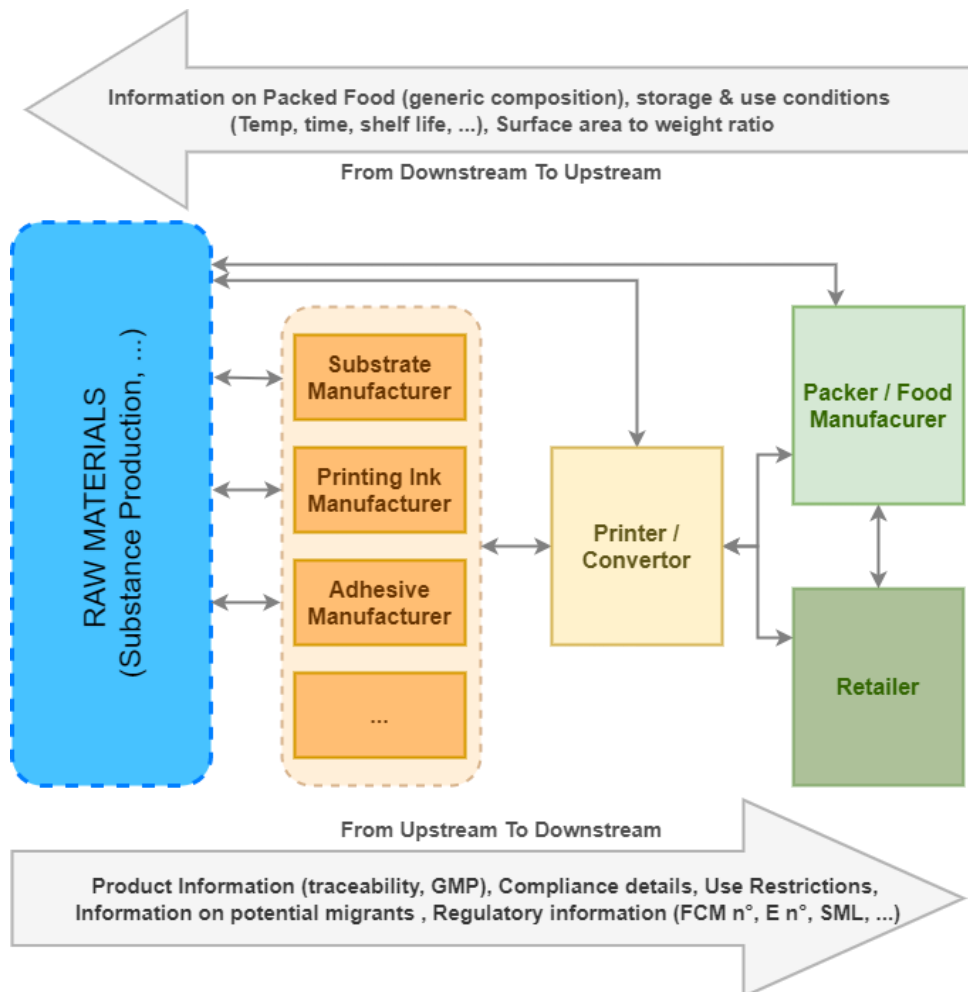
The raw materials that you supply may contain substances that have the potential to migrate. In order for converters to assess the levels of potential migration from packaging, EuPIA members are required to supply converters with a Statement of Composition (SOC) for a printing ink. This SOC will list those substances that have the potential to migrate along with the specific migration limits and the amount of that substance that the printing ink contributes. The specific migration limits for a substance may come from the Plastics Regulation (EU) No 10/2011, from another recognised authority such as an EFSA opinion or from the Swiss Ordinance SR 817.023.21, Annex 10. For Non-Intentionally-Added-Substances (NIAS) or substances where listing is not required then internationally recognised principles of risk assessment should be followed. Guidance on this process can be found in the *EuPIA Guidance for Risk Assessment of Non-Intentionally Added Substances (NIAS) and Non-Listed Substances (NLS) in printing inks for food contact materials*.³

Each member of the whole production chain is obliged to forward known and relevant raw material information regarding substances with the potential to migrate. In any failure to fulfil these information requirements the responsible member of the supply chain could be held liable for the non-conformity of the finished packaging due to the given incorrect or incomplete information.

¹ REGULATION (EC) No 1935/2004 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC, OJEU L338 of 13. 11. 2004

² The definition of packaging inks also includes primers, lacquers and overprint varnishes applied by a printing and/or coating process, such as flexography, gravure, letterpress, offset, screen, non-impact printing or roller coating.

³The document can be downloaded at www.eupia.org



EuPIA, 2012-06-20
 1st amendment 2013-02-19
 2nd amendment 2022-05-11
 3rd amendment 2025-08-05