
PRESS RELEASE

EuPIA publishes guidance on Swiss Ink Ordinance and declaration of conformity (DoC)

Since 2017 the “Swiss Ordinance” (Ordinance on Materials and Articles in contact with Food SR 817.023.21) sets standards for printed food packaging materials in Switzerland. With the revision from December 2023 the Swiss authorities implemented some major changes amongst which the requirement for a declaration of conformity (DoC). In line with the provisions of the EU food contact legislation and the relevant guidance documents of the Council of Europe, each actor in the value chain has to provide the information needed by the next actor for compliance work.

Therefore, this DoC will be required at all intermediate stages up to the final packaged food product and some confusion in the supply chain is felt, e.g. about what needs to be included at which stage. For printing inks, EuPIA members provide already now what is called a Statement of Composition (SoC). This SoC lists those substances with the potential to migrate along with the applicable migration limits and the amount of that substance in the ink or coating. The SoC provides all the information the converter needs.

Christof Walter, EuPIA’s food contact manager elaborates further: “Our SoC also mirrors what has been agreed within the Packaging Ink Joint Industry Task Force (PIJITF), an industry forum created by all stakeholders involved, and what is written in their Guidance on Information and Transparency”. Hence, also under the revised Swiss Ordinance, the SoC remains the relevant tool **to pass the adequate information from the ink manufacturer to the converter**. In other words, an SoC prepared according to the recommendations and standards of EuPIA provides all information that has to be communicated for the stage of the ink production as set out in Annex 15 of the SIO and becomes so to speak an “ink DoC”. In a next step the converter then needs to issue a “converter DoC” by including additional parameters like surface-to-volume ratio, film weight, substrate etc.

This information is part of the overall risk assessment of the final article and can only be provided by the converter as the ink manufacturer might not know about all end application for the ink.

To provide further clarity on this and other questions, EuPIA and VSLF have now issued additional guidance.

LINKs:

- EuPIA guidance document : [20251202 VSLF-EuPIA Guidance SIO.pdf](#)
- Q&A: [20251202 SIO QA final.pdf](#)
- For reference: [PIJITF-Guidance-on-Information-Flow-and-Transparency-in-the-Supply-Chain Final-March-2024.pdf](#)

About EuPIA:

EuPIA is the European Printing Ink Association and was founded in 2003 as a division of CEPE, the European Council of the Paint, Printing Ink and Artists’ Colours Industry. EuPIA represents the interests of European manufacturers of printing inks and related products. EuPIA represents over 80 companies directly employing 11,000 people.