

Customer Information Note: Are Functional Coatings in scope of the German and Swiss Ink Ordinance?

This statement is an EuPIA interpretation and is not legally binding.

Whereas in the original text of the 21st Ordinance amending the German Consumer Goods Ordinance (the so-called “German Ink Ordinance”) no detailed definition of printing inks is given, a corresponding reference can be found in printed paper 655/21, which was submitted to the German Federal Council on August 16, 2021 in section B (special section) on page 102 (“Bundesrat Drucksache 655/21”):

“Printing inks” and “printing lacquers” are established terms in the supply chain. Reference is made, for example, to the relevant definition of the Packaging Ink Joint Industry Task Force (PIJITF)ⁱ. Accordingly, these include printing inks or printing lacquers that are applied, in particular, to create graphic or decorative patterns (lettering, colouring, imaging) or to give a printed pattern certain function such as ink adhesion, rub resistance, gloss, slip or durability.

Lacquers other than printing lacquers do not fall within the scope of the regulation, for example those that are intended to provide a protective function for the food contact material to which they are applied (e.g. internal can lacquers to protect against corrosion).ⁱⁱ

Functional coatings as defined by EuPIAⁱⁱⁱ fall under the term “lacquers other than printing lacquers”. Accordingly, these products do not fall within the scope of the German Ink Ordinance nor, by extensions, the Swiss Ink Ordinance.

It needs to be noted that the legal reference for food contact materials (including Functional Coatings) is the EU Framework Regulation (EC) No 1935/2004.

EuPIA FCETF, January 2026

ⁱ Definition of printing inks agreed by the Packaging Ink Joint Industry Task Force (PIJITF)

“Printing inks are:

- a) Mixtures of colourants with other substances which are applied on materials to form a graphic or decorative design together with or without
- b) Other coloured or uncoloured overprint varnishes/ coatings or primers which are normally applied in combination with A) in order to enable the printed design to achieve specific functions such as ink adhesion, rub resistance, gloss, slip/friction, durability, etc. Printing inks do not include coatings which are applied with the prime objective of enabling the material or article to achieve a technical function such as heat sealing, barrier, corrosion resistance etc., as opposed to a graphic effect, even though they may be coloured.”

ⁱⁱ Courtesy translation

ⁱⁱⁱ [Information Note : Functional Coatings](#)