

Q&A on the transition from the Exclusion Policy to the EuPIA Charter on Raw Material Selection and Exclusion for Printing Inks and Related Products

1. What is the Charter and to whom does it apply?

The EuPIA Charter is a voluntary industry instrument designed to ensure the safe handling of printing inks. By becoming signatories, EuPIA member companies commit to adhering to the Charter and to excluding and substituting raw materials - as substances or mixtures - with a severe human health hazard classification from printing inks and related products.

The signatories are listed on the EuPIA website. <https://www.eupia.org/our-commitment/eupia-charter-for-printing-inks-and-related-products/#Companies>

2. Why change the Exclusion Policy?

Since its establishment in 2016, the Exclusion Policy has undergone 8 revisions—three of them in recent years—to keep pace with the rapidly expanding number of harmonized substance classifications and emerging hazard classes. This accelerating regulatory landscape made it increasingly difficult to maintain viable solutions for approved raw materials and for applications where exposure does not occur, such as digital industrial print rooms. As a result, the balance and fairness of the Exclusion Policy began to erode, creating a risk that well-characterized substances would be replaced with alternatives offering far less toxicological certainty. To restore a level playing field and support responsible product stewardship, a more sustainable, evidence-based approach was needed.

3. What is new about the concept?

The basic principles were kept, including the substitution goal.

For the most severe hazard classifications (group I substances), the conditions are even strengthened as no continued use is possible after the default substitution time is expired – therefore the overall substitution time is now 12 months.

For substances classified in Group II for which a threshold dose can be established, representing the minimum level of a substance or exposure below which a specific effect is not observed, the continued use of such substances may be permitted only where substitution is demonstrably not feasible, and where an established internal risk assessment documents safe use. These clearly defined use cases, evaluated and approved by the EuPIA Technical Committee, will be reviewed biennially to reassess the situation.

4. What are the conditions for continued use?

This is only applicable for group II substances (for which a threshold can be set).

First a request for continued use detailing the application and why a substitution is not possible needs to be submitted and positively evaluated by the EuPIA Technical Committee (ETC).

A threshold dose will be provided as derived no-effect level (DNEL) by the Hazard Assessment Committee (HAC) composed of EuPIA toxicologists. This can be the DNEL from the REACH registration dossier, a more stringent or a new DNEL adapted to the printing ink uses and relevant exposure route. The applicant shall then conduct a risk assessment. Where safe use can be demonstrated, the raw material may continue to be used. The ETC shall reassess the situation every two years.

Where safe use cannot be demonstrated, the raw material shall no longer be used.

5. Why a new name?

The Exclusion Policy was revised eight times in eight years. A more sustainable approach was needed and the changed methodology should be symbolized by a new name. The “exclusion” is still reflected in the subtitle.

6. Is this a simplification or dilution of the Exclusion Policy?

No. Some parameters are more severe like the mandatory substitution of category I substances and no possibility of applying for continued use.

Others have been adopted to reflect the regulatory-wise increasing number of purely hazard-based human health classifications. In case that continued use is approved, the printing ink specific DNEL can be more severe than the one from the supplier provided in the REACH dossier. Verifying DNELs or deriving them establishes a double check of the workplace situation.

7. Why is there a difference in groups?

Group II comprises substances for which a threshold dose can be set that represents the minimum amount of a substance or exposure below which a specific effect is not observed. This means that the risk of exposure at the workplace can be controlled with appropriate measures (close systems, ventilation, personal protection equipment).

Group I are either substances for which such a threshold cannot be set or substances for which risk control is difficult to achieve.

8. Why are carcinogens in either one or the other group?

This depends on whether they are genotoxic or not as this determines whether a threshold level can be set. Genotoxic carcinogens cause cancer by directly damaging DNA, while non-genotoxic carcinogens cause cancer through indirect, non-DNA-damaging mechanisms. For genotoxic carcinogens, risk assessment usually assumes no safe threshold, because even a very low dose could, in principle, cause a DNA mutation that initiates a tumor. For non-genotoxic carcinogens, a threshold is generally assumed: below a certain exposure level, the adaptive capacity of tissues is not overwhelmed, so cancer risk is considered negligible.

9. If this is voluntary, who checks?

The EuPIA Technical Committee is responsible for setting the parameters and conditions under the Charter. This means setting substitution time, evaluating continued uses applications and, where applicable, checking the risk assessment. The EuPIA secretariat tracks all raw materials subject to the Charter, and the ongoing continued use cases. DNELs will be published on the EuPIA website.

10. How can I know whether my supplier is a signatory?

All signatories are listed on the EuPIA website. The Charter applies to all sites of the signatory in Europe (EAE, EFTA and UK).

11. What if a supplier declares to be following the Charter but does not appear on the website?

There might be companies not listed that are following the Charter for only one of their products or sites. We also encourage non-EuPIA members to respect the Charter.

12. Is it possible for printers to use remaining stock after the end of the substitution period?

The Charter only applies to the printing ink manufacturers, so yes this is a possible scenario.

Should your question not be addressed please submit it to eupia@cepe.org

ETC March 2026