Frequently Asked Questions
ON THE LEGAL STATUS OF PRINTING INKS, COATINGS AND VARNISHES FOR FOOD CONTACT MATERIALS (FCM INKS)

1. **Does EU legislation on printing inks for food contact materials exist?**
   Up to now, no specific EU harmonised legislation on printing inks for food contact materials (FCM inks) has been issued, with the exception of Directive 2007/42/EC relating to materials and articles made of regenerated cellulose film, which states that the printed surface of regenerated cellulose film must not come into contact with food, and therefore is relevant to printing inks for food contact materials.

2. **Are printing inks subject to any other EU legislation?**
   Even if printing inks are applied on the non-food contact surface of food contact materials, as a component of the printed FCM, they must not prevent the final FCM from meeting the requirements of Regulation (EC) No 1935/2004 concerning materials and articles intended to come into contact with foodstuffs.

   This Regulation requires that no food contact material (whether printed or not) should endanger human health, change the composition of the food or alter the organoleptic properties of the food. In addition, Commission Regulation (EC) No 2023/2006 “on good manufacturing practice for materials and articles intended to come into contact with food” (GMP Regulation) also makes specific reference to printing inks.

   Furthermore, in case of printed FCM made from plastics also regulation (EU) No 10/2011 is of relevance. For ink ingredients listed in the Union list in Annex I the corresponding SMLs need to be observed. For substances not included in the Union list, a risk assessment according to article 19 is required.

   The European Union has significantly tightened regulations on hazardous substances in printing inks, primarily focusing on Bisphenol A (BPA) and per- and polyfluoroalkyl substances (PFAS) to address growing health and environmental concerns. Under Regulation (EU) 2024/3190, which entered into force in early 2025, the intentional use of BPA is officially banned in most food-contact materials, including the printing inks applied to food packaging.[1] This move follows scientific findings from the European Food Safety Authority (EFSA) highlighting BPA's role as an endocrine disruptor.

   Simultaneously, the EU's Packaging and Packaging Waste Regulation (PPWR) and the broader REACH restriction proposal have introduced strict concentration limits for PFAS – effectively banning their intentional use in food-contact packaging.[2]

3. **Are printing inks covered by other provisions?**
   In 2005, the Council of Europe (CoE) Committee of Ministers of the Partial Agreement in the Social and Public Health Field adopted the Resolution ResAP (2005)2 on “Packaging Inks Applied to the Non-Food Contact Surface of Food Packaging”. CoE Resolutions are not legally binding but should

[1] For More information, see EuPIA Customer Information Note on BPA and Printing Inks for Food Contact Materials under Regulation (EU) 2024/3190
[2] https://www.eupia.org/wp-content/uploads/2026/04/2026-04-08-EuPIA-Information-Note-on-PFAS-and-Printing-Inks-in-the-context-of-PPWR.pdf

be considered as statements of policy for national policy makers of the Partial Agreement member states. EuPIA could not support the Resolution as adopted, because it was not practicable. The substance inventory lists were not sufficiently comprehensive and did not provide protection for consumer health or reflect current practices.

Up to now, Germany and Switzerland are the only European states to establish national legislation covering printing inks.

The German Printing Ink Ordinance (GIO, part of the “Bedarfsgegenständeverordnung” (Consumer Goods Ordinance) is the first comprehensive national legislation of an EU member state to specifically regulate printed food contact materials. While it officially entered into force in late 2021, its full impact is being felt now as the transition period was recently extended to December 31, 2026. This ordinance is highly influential because it fills a legal "gap" where no specific EU-wide harmonized law for printing inks yet exists, effectively setting a standard that many European manufacturers are adopting to ensure they can continue to sell in the German market.

a. The core of the German ordinance is a positive list of substances (Annex 14 Tables 1 and 2), which may be used for the manufacture of printing inks for food contact materials. Table 2 will be considered obsolete after the transition period.

b. Furthermore, substances may be used which are covered by a dynamic reference to the positive list of regulation (EU) No. 10/2011 on plastic materials and articles intended to come into contact with food if there are no restrictions in column 9 or 10 of the corresponding table.

c. For the manufacture of food contact materials where the printing ink layer comes into direct contact with food during normal or foreseeable use, including those cases where the final application is not directly intended for this purpose (e. g. printed napkins) starting 1st of January 2027, after the end of the transition time, only substances mentioned above under a. and b. may be used as intentionally added substances (IAS).[3]

d. For the printing of food contact materials where the printing ink layer is not in direct contact with foodstuff, printing inks may be applied which also contain non-listed substances (NLS); these substances should not be classified or exhibit CMR properties according to the criteria of the CLP Regulation; in addition, a migration must not be detectable at a detection limit of 10 ppb.[4]

Since 2008, a similar amendment to the Swiss Ordinance on Materials and Articles (SIO, SR 817.023.21) has been in force, detailing certain provisions specific to FCM inks applied on the non-food contact surface of FCMs. The core element being a list of “permitted substances”, identifying substances which may be used in the manufacture of inks marketed in Switzerland. Following several revisions, the last version contains the positive list as Annex 10 in a revised form. After 31st February 2021 all transition periods expired. For more information on the Swiss Ordinance please consult the relevant EuPIA SIO Guidance and Q&A documents.[5]

[3] Originally, the ordinance foresaw an additional longer transition period for non-intended direct food contact applications: For food contact materials where the printing ink layer comes into direct contact with food during normal or foreseeable use, although they are not intended for this purpose (e. g. printed napkins), the printing inks may additionally contain the pigments listed in Table 2 until 2027 (i.e. one year longer than the original transition period of the ordinance). However, since the general transition period of the ordinance has been extended to 1st January 2027, this additional transition time and table 2 are no longer relevant.

[4] https://www.gesetze-im-internet.de/bedggstv/BJNR008660992.html, Verband der deutschen Lack- und Druckfarbenindustrie e.V. | Informationsvermerk: 21. Verordnung zur Änderung der Bedarfsgegenständeverordnung ("Druckfarbenverordnung")

[5] https://www.eupia.org/key-topics/food-contact-materials/legislation/

For both regulations mentioned above (SIO and GIO) the so called NIAS (non-intentionally added substances) fall under the provisions of general health protection regarding FCMs (Art. 49 LGV and Art. 3 of (EC) No 1935/2004) and must be assessed by experts on a case-by-case basis as part of self-regulation.[6]

In the absence of specific EU legislation, EuPIA issued many guidelines, for instance a "Good Manufacturing Practice (GMP) for Printing Inks for Food Contact Materials" (5th completely revised version, November 2025) setting out a mechanism for the selection of raw materials for FCM inks. It is considered that this GMP satisfies the current requirements of the food contact supply chain.

4. What is the industry position on positive lists for FCM inks raw materials?

As part of an integrated approach, positive lists help in communicating developed toxicological data and harmonized migration limits. They provide transparency for substances used; however, any positive list alone does not guarantee packaging and thus consumer safety. Hence, positive lists should be complemented by risk-based approaches, as suggested by the Packaging Ink Joint Industry Task Force (PIJITF).[7]

5. What is the industry position on threshold limits of substances migrating from the dried printing ink layer?

Where they exist, specific migration limits (SML) must be met. Regarding non-evaluated substances, migration limits of no concern – based on toxicological assessments – have to be established.

6. Are UV (EB) printing inks compliant in the GIO/SIO-framework?

Many Photoinitiators mentioned on the EuPIA Suitability List are on the SIO positive list. Additional suitable photoinitiators exist which do not need to be listed (non-CMR, migration <10 ppb). However, their performance may be different. It is technically and regulatory possible to formulate compliant UV inks. However, it may be necessary to modify the printed design. Details can only be provided by the respective printing ink supplier.

7. What are the legal responsibilities in the food contact supply chain?

There are many types of final package, of which printing ink is only one constituent. Since the parameters in the printing, packing and storage processes are not under the control of the printing ink manufacturer, the printing ink suppliers are not able to issue certificates or declarations of compliance which cover the legal responsibility of the entire food contact supply chain.

Due to the complexity of the process, all members along the food contact supply chain must exchange relevant information – under appropriate confidentiality agreements if necessary – in order to ensure that products are fit for purpose, and thus compliant with all legal responsibilities. To this end EuPIA members will provide adequate information about the composition of their products by means of a standard ink Statement of Composition (ink SoC). This will allow the manufacturer of the printed food contact material and the food filler to meet their legal responsibility to ensure that it is fit for its intended purpose.

[6] For more information see EuPIA Guidance for Risk Assessment of Non-Intentionally Added Substances (NIAS) and Non-Evaluated or Non-Listed Substances (NLS) in printing inks for food contact materials

[7] https://www.eupia.org/key-topics/food-contact-materials/pijitf-packaging-ink-joint-industry-task-force/

8. **How are the responsibilities in the food contact supply chain managed?**
   According to Good Manufacturing Practices, or quality control standards, the co-operation between all members of the food contact supply chain is managed by requirement specifications, e.g. by information about the substrates, type of food packed, printing and converting process parameters, storage and treatment conditions. The ink manufacturer will select or formulate the ink accordingly, which if used correctly will allow the final FCM to meet the legal requirements.

9. **What information will member companies of EuPIA make available on FCM inks to enable the rest of the food contact supply chain to meet the legal requirements?**
   To provide downstream users of FCM printing inks with all relevant information, EuPIA members will issue Technical Datasheets (TDS), Material Safety Datasheets (MSDS) and Statements of Composition (ink SoC).

10. **What specific verifications of compliance are recommended to users of FCM ink products?**
    The printer should conduct representative practical investigations, such as migration testing or migration modelling, to cover the specific FCM application category.
    If required, EuPIA members can help identify suitable laboratories that have the analytical capability to give a qualified verification of compliance of printed FCMs.

11. **Where can I find detailed further information and the documents mentioned above?**
    The most recent versions of all a.m. EuPIA documents, can be found at www.eupia.org. Please navigate to “key topics/Food Contact Materials”, e.g. Legislation - Eupia. An overview of all concepts is provided by the EuPIA Guideline on Printing Inks applied to Food Contact Materials.[8]

PIFOOD / 2007-05-09
1st revision, 2012-02-14
2nd revision, 2019-02-21
3rd revision, 2021-04-23
4th revision, 2026-06-05

[8] EuPIA principles - Eupia